



31 July 2020

Romlie Mokak  
Commissioner  
Productivity Commission  
Locked Bag 2  
Collins Street East  
MELBOURNE VIC 8003

Dear Commissioner

### **Indigenous Business Australia – draft Indigenous Evaluation Strategy – further comments**

Indigenous Business Australia (IBA) welcomes the draft Indigenous Evaluation Strategy, the principles underpinning it, and the way in which it aims to centre Aboriginal and Torres Strait Islander people, perspectives, priorities and knowledge in the policy lifecycle.

As you will be aware, IBA provided an earlier submission on 23 August 2019, prior to the release of the draft strategy.

As IBA is supportive of the content of the draft Indigenous Evaluation Strategy, our comments in this further response are limited to three specific points:

1. the role of evaluation (and its limitations) in improving policy settings
2. the need for coordination and communication between agencies conducting audit and evaluation functions to avoid duplication and overlaps, and
3. IBA's Impact Framework.

#### **1. The role of evaluation in improving policy settings**

IBA's earlier submission of 23 August 2019 spoke to the need for structural reform of policy frameworks affecting Aboriginal and Torres Strait Islander people, and noted that:

*....although more and better evaluation is one necessary component for improving Aboriginal and Torres Strait Islander policies and programs (and indeed for those evaluations to be structured around an Indigenous Engagement Strategy), IBA considers that there are structural matters that must first be addressed – being the development of a policy and program framework that is led by Aboriginal and Torres Strait Islander people.*

In reiterating this point, IBA is not discounting the usefulness of evaluations (and particularly IBA is not discounting the potential impact of the proposed Indigenous Evaluation Strategy)

in highlighting where programs and policies are underperforming, and where improvements can be made.

Rather, the point is that policy reform includes a range of drivers (including political considerations), and that evaluations on their own may not necessarily be influential in driving improved policy outcomes. IBA considers that the structural matters discussed in our earlier submission and the development of a policy and program framework that is led by Aboriginal and Torres Strait Islander people should remain a key focus in that regard.

## **2. Interaction of the Strategy and the Office of Indigenous Policy Evaluation with other initiatives to drive an evaluation culture in the Australia Public Service**

IBA's earlier submission of 23 August 2019 highlighted that:

*[i]t is incontrovertible that to be most effective, policies and programs need to be built upon high quality and relevant data and qualitative and quantitative evidence. Developing an evaluation culture which forces policy and program stakeholders to question the effectiveness of their activities is critical for creating this sort of evidence that supports policies and programs to achieve this goal.*

IBA supports the efforts, through the work of the Productivity Commission and the development of the draft Indigenous Evaluation Strategy, including:

- through broader reviews of the functioning of the Australian Public Services (APS);
- to develop an improved evaluation culture;
- to improve the quality of evaluations; and
- to ultimately aid with policy development and policy and program delivery.

IBA also notes the importance of evaluation and audit processes in aiding and improving the transparency and accountability of performance across the APS.

Noting this increased focus on evaluations more broadly in the APS, and that the draft Indigenous Evaluation Strategy includes a proposal to establish a new Office of Indigenous Policy and associated Indigenous Evaluation Council (which will identify evaluation priorities), IBA recommends the need for there to be strong mechanisms of collaboration and coordination between the various audit and evaluation agencies across the APS so as to avoid any potential for duplication and repetition in audit or evaluation focus.

## **3. IBA's Impact Framework**

IBA's Board recently endorsed IBA's first Impact Framework, which was co-designed with Indigenous evaluation expert and Eastern Arrernte man, Dr Kevin Dolman. Our inaugural Impact Report is scheduled for public release in December 2020 and we would welcome the opportunity to share the results with your team.

The Impact Framework was developed following an extensive investigation phase led by Dr Kevin Dolman and draws from the Interplay Wellbeing Project. In developing the Interplay Wellbeing framework, more than 800 Aboriginal participants were involved to assist design a purpose-specific framework to address the challenges in monitoring and evaluating impact within the Indigenous context. The Interplay Wellbeing Framework provides an evidence base for an objective measure of the complex interrelationships between economic participation, health, wellbeing and education and the role of culture, community and empowerment.

The IBA Impact Framework draws upon the Interplay Wellbeing Framework and will assist provide important insights into how IBA can apply appropriate indicators to tell the economic, social and cultural story of IBA's impact.

The guiding principles of our Impact Framework include:

- Transparency, Accountability and Continuous Improvement
- Good practice for impact monitoring and evaluation
- Good practice for monitoring and evaluation in Indigenous contexts
- Good practice Indigenous community development
- Balancing the time and costs of data collection, analysis and reporting against the data needs.

IBA's Impact Framework is aligned with and complements the approach proposed in the draft Indigenous Evaluation Strategy (by centring Aboriginal and Torres Strait Islander people, perspectives, priorities, and knowledges). IBA has received ethics clearance from AIATSIS to commence data collection as envisaged by the Impact Framework, which will enable IBA to improve our understanding of the economic, social and cultural impacts of our work and how this impact generates change for our customers. The Impact Framework will also be a useful tool for IBA to assist guide how we monitor, evaluate and report on our activities, and will help us adapt and transform our products to ensure maximum impact for our customers into the future.

Yours sincerely

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**Rajiv Viswanathan**  
Chief Executive Officer