



**Aboriginal
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3 August 2020

The Honourable Romlie Mokak
Commissioner
Productivity Commission
GPO Box 1428
CANBERRA CITY ACT 2601

Dear Commissioner Mokak,

Re: Submission on the Draft Indigenous Evaluation Strategy

Thank you for the opportunity to provide comment on the Draft Indigenous Evaluation Strategy (IES) and A guide to Evaluation under the Indigenous Evaluation Strategy Draft.

The Aboriginal Housing Office (AHO) strongly supports the overarching principle of the Strategy, that Aboriginal and Torres Strait Islander people's perspectives, priorities and knowledge must be at the centre of the evaluation of policies and programs. AHO views the development and conduct of evaluations as a shared space where mutual knowledge exchange can occur between Aboriginal people, government, and researchers while respecting the cultural knowledge of Aboriginal people.

The Aboriginal Housing Office context

AHO is a statutory body established under the [Aboriginal Housing Act 1998 \(NSW\)](#) with a vision to ensure every Aboriginal person in NSW has equal access to, and choice in, affordable housing. AHO achieves this vision by continually supporting a sustainable housing sector through accessible, culturally appropriate and affordable housing for the Aboriginal people of NSW.

AHO manages and coordinates an annual capital works program, along with developing and implementing financial and resourcing strategies. AHO is a division of the [NSW Department of Planning, Industry & Environment](#) and a part of the NSW Government support network that delivers services for those most in need in NSW. Underpinning all planning is a strong commitment to the principles of self-determination and self-management, articulated through inclusive, fully consultative planning.

With reference to the IES and accompanying guide, the AHO would like to highlight the following points.

IES Priorities

AHO is pleased to see that the IES covers Aboriginal-specific policies and programs, as well as mainstream policies and programs that impact Aboriginal and Torres Strait people.

In acknowledgement of the primacy of housing for Aboriginal people to build better lives, AHO is also pleased to see that housing is one of the proposed evaluation priority areas – aligning with the Closing the Gap refresh.

Additional Guidance on Indigenous Data Sovereignty (IDS)

AHO agrees with the principles of Indigenous Data Sovereignty and the right of first nations peoples to 'exercise ownership over Indigenous Data. Ownership of data can be expressed through the creation, collection, access, analysis, interpretation, management, dissemination and reuse of Indigenous Data'¹. The IES implicitly signals a move towards IDS through a focus on building evaluation expertise with Aboriginal people and the centring of Aboriginal priorities, perspectives and knowledge in evaluation that will eventually enable increased ownership of Indigenous Data. However, this will be a longer term process. The inclusion of additional guidance on what evaluators could be doing in the more immediate future in terms of any enabling protocols or practical applications of IDS, such as data sharing agreements that can support evaluators to move towards IDS, would be welcomed.

¹ www.maiamnayriwingara.org/key-principles



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Ethical considerations

AHO agrees that linked data can improve the quality and rigour of evaluation. However, the use of existing data, even when de-identified, is open to the risk of perpetuating deficit discourses about Aboriginal people as it is analysed and interpreted in the absence of other contributing external, contextual factors. For this reason, the following statement on page 16 of the IES document could be considered problematic, 'where evaluation relies exclusively on existing or de-identified data, formal ethical review may not be necessary'. This statement potentially overlooks the need to assess this on a case-by-case basis and potentially signals a green light to evaluators in situations where there is a need for ethics review and approval.

AHO considers Free Prior and Informed Consent² essential for all evaluations. Free meaning 'no coercion, intimidation or manipulation to consent'³. Prior meaning 'consent has been sought sufficiently in advance of any authorisation or commencement of activities and that respect is shown for time requirements of Indigenous consultation/consensus processes'⁴. In addition to the conventional process of obtaining informed consent at the individual level, it may be also necessary to gain consent at the community level. The EIS would benefit from highlighting these additional requirements that depart from conventional informed consent processes.

Guidance for Aboriginal and Torres Strait Islander people and how they can be involved in evaluation

AHO understands that building trusting relationships is the first and essential step in conducting quality evaluation and welcomes the focus on trust in the IES. In developing our AHO Evaluation Framework, we also developed a plain language companion document aimed at potential Aboriginal participants who may have no evaluation expertise. The intention was to signal a break from the past research practices that Aboriginal people have experienced, and also to outline how in practice we would be putting the worldviews of Aboriginal people in NSW at the centre of our evaluations. This included a graphic that showed how we will provide opportunities for Aboriginal people to be involved at different points in the evaluation process. The IES would benefit from having a similar document for Aboriginal people and communities that outlines how they can be involved in evaluation and what they should expect from a quality evaluation process.

Shining a light on culturally valid methods of data collection

Rigorous evaluation is dependent on the insights of Aboriginal people, but also the technical evaluation skills that we need to build together. AHO suggests that the Guide to Evaluation under the IES provide more guidance on the culturally valid methods of yarning (storytelling), ganma (knowledge sharing) and dadirri (listening) outlined on page 22 and how these can be used in evaluation. We note that yarning and dadirri are expanded on in the background paper (p28, p148, p178), but as methods that facilitate the positioning of Aboriginal worldviews and priorities at the centre, we suggest that more focus on unpacking what these methods look like in practice be included in the guide, so the information is easily accessible and such methods can be taken up more readily by evaluators.

Embedding evaluation into the policy cycle and commissioning

AHO agrees on the importance of embedding evaluation early so that baseline data can be captured and the right data collected. In a commissioning context, consideration needs to be given to engaging staff with evaluation expertise at the procurement stages of a program. Commissioning partners need to be aware of the data requirements of their programs to enable rigorous evaluation and these data requirements will often need to be agreed to as part of contractual obligations. Commissioning partners and commissioners are often familiar with and expect to report on performance indicators. However, there is less understanding of the outcomes data that may be required and the importance of consistently collecting such data to avoid data gaps and measure the impacts of programs by establishing baselines. Given the historical research experiences of Aboriginal and Torres Strait Islander people, it is even more important to have transparency around such data requirements when engaging Aboriginal-led or controlled organisations and have evaluation experts on hand to explain how the findings from such data can be used to benefit Aboriginal people. If such data requirements are not outlined from the outset and embedded in contractual obligations, given the historical research experiences of

² www.un.org/development/desa/indigenouspeoples/publications/2016/10/free-prior-and-informed-consent-an-indigenous-peoples-right-and-a-good-practice-for-local-communities-fao/

³ <https://humanrights.gov.au/our-work/appendix-4-elements-common-understanding-free-prior-and-informed-consent-social-justice#fn1>

⁴ ibid



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Aboriginal and Torres Strait Islander people, it is understandable that they may hesitate to collect some data. Given that many programs are commissioned in government, we recommend drawing attention to the above stated in the guide document on page 14 where it refers to commissioning.

Pathways to evaluation research for early career Aboriginal researchers

Evaluation design requires specific technical skills and AHO is pleased to see a focus on developing these skills with Aboriginal people. We would also welcome the establishment of pathways to research and evaluation workplace opportunities for early career Aboriginal researchers as part of the Strategy.

Building evaluation culture and evaluation capability

AHO believes that the IES provides a valuable opportunity to establish a national Indigenous program evaluation community of practice. This should raise the quality of program evaluation activity through the exchange of methodological insights and early findings observed during the life of evaluations and strengthen evaluation practice at the pre-publication stage. Ultimately, a national community of practice should improve the quality of evidence produced on services and programs for Aboriginal people and communities.

Yours sincerely,

Jody Broun
Chief Executive, Aboriginal Housing Office
Group Deputy Secretary, Aboriginal Strategy & Outcomes
Department of Planning, Industry and Environment