



SNAICC

National Voice for our Children

SNAICC Submission to the Productivity Commission
Draft Indigenous Evaluation Strategy

August 2020

About SNAICC

SNAICC – National Voice for our Children (SNAICC) is the national non-government peak body for Aboriginal and Torres Strait Islander children.

SNAICC works for the fulfilment of the rights of our children, in particular to ensure their safety, development and well-being.

The SNAICC vision is an Australian society in which the rights of Aboriginal and Torres Strait Islander children, young people and families are protected; our communities are empowered to determine their own futures; and our cultural identity is valued.

SNAICC was formally established in 1981 and today represents a core membership of Aboriginal and Torres Strait Islander community-controlled organisations providing child and family welfare and early childhood education and care services.

SNAICC advocates for the rights and needs of Aboriginal and Torres Strait Islander children and families and provides resources and training to support the capacity of communities and organisations working with our families.

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Overview of the Draft Indigenous Evaluation Strategy

The Australian Government has asked the Productivity Commission to develop a whole-of-government evaluation strategy for Australian Government policies and programs affecting Aboriginal and Torres Strait Islander people.

While the Strategy is intended to primarily guide Australian Government agencies when they are selecting, planning, commissioning, conducting and using evaluation, in practice it applies to everyone involved in the evaluation of Australian Government policies and programs affecting Aboriginal and Torres Strait Islander people, including:

- individuals and communities who are recipients of the policies and programs being evaluated who may participate in interviews and/or surveys as part of the evaluation
- external evaluators who are commissioned to conduct evaluations
- service providers who deliver policies and programs who may be involved in collecting data, identifying evaluation participants, participating in, and implementing recommendations from, evaluations
- peak bodies and community representatives who may contribute to evaluation planning and design or provide input to evaluations
- users of evaluation including ministers, policy and program administrators and other individuals and groups that make decisions about policy and program design and implementation.

The Productivity Commission has outlined four key reasons for an Indigenous Evaluation Strategy:

1. To centre Aboriginal and Torres Strait Islander people, perspectives, priorities and knowledges in evaluations of policies and programs that affect them
2. To 'lift the bar' on the quality of evaluations of policies and programs affecting Aboriginal and Torres Strait Islander people
3. To enhance the use of evaluations to inform policy and program design and implementation by supporting a culture of evaluation and building a body of evidence and data on the effectiveness of policies and programs
4. To promote a whole-of-government approach to priority setting and evaluation of policies and programs affecting Aboriginal and Torres Strait Islander people.

The objective of the Indigenous Evaluation Strategy is to improve the lives of Aboriginal and Torres Strait Islander people by having policy and program decisions informed by high quality and relevant evaluation evidence.

The overarching principle of the Strategy is centering Aboriginal and Torres Strait Islander people, perspectives, priorities and knowledges. This principle is about recognising the strengths of Aboriginal and Torres Strait Islander people, communities, knowledges and cultures. It is also about building genuine partnerships with Aboriginal and Torres Strait Islander people to define policy and program outcomes, decide on evaluation questions, how evaluations will be conducted and how evaluation findings will be interpreted.

This will improve the quality and use of evaluations and better align policies and programs with the needs and priorities of Aboriginal and Torres Strait Islander people. The overarching principle is also the lens through which the Strategy's other principles — credible, useful, ethical and transparent — are interpreted.

Introduction

SNAICC welcomes the opportunity to provide valuable insights regarding the draft Indigenous Evaluation Strategy (the Strategy). SNAICC notes the draft has been developed via a process of extensive consultation with a wide range of Aboriginal and Torres Strait Islander stakeholders across Australia.

SNAICC has worked tirelessly over many years to forge trusted and meaningful relationships with a wide range of Aboriginal Community Controlled Organisations and broader sector stakeholders. This allows us to effectively understand the needs and aspirations of Aboriginal children and families and communities more broadly. We have a deep understanding of the complexities and challenges that our sectors and communities face and this enables us to have confidence in providing expert advice to the commission concerning potential gaps relating to the Strategy.

The Strategy presents a valuable opportunity to establish clear standards for evaluation practice and opportunities to capture outcomes that may be currently slipping through the cracks. As it currently stands, Aboriginal and Torres Strait Islander people have minimal input into evaluations. It is reported that only one-fifth of evaluations of Indigenous-specific policies and programs reported engaging with Aboriginal and Torres Strait Islander people in evaluation decision making. Furthermore, one out of 47 evaluations of mainstream policies and programs involved Aboriginal and Torres Strait Islander people in evaluation planning and decision making and that two-thirds of mainstream policy or program evaluations that mentioned or provided results for Aboriginal and Torres Strait Islander people did not report engaging with Aboriginal and Torres Strait Islander people¹.

These figures demonstrate the extent of current poor evaluation practice and amplifies the need for increased accountability and oversight concerning evaluation priorities, methodologies, and the necessity to include Aboriginal and Torres Strait Islander perspectives in order to achieve better outcomes.

While SNAICC is strongly supportive of the government's increased focus on lifting the bar concerning evaluation practice, agencies are likely to need an abundance of resources and support to enable them to build a better fundamental relationship with Aboriginal and Torres Strait Islander communities as a starting point. It will be very challenging for agencies to increase their level of quality dialogue and engagement with communities, without investing in initiatives that aim to strengthen relationships and build trust within communities fundamentally.

This work is critical and should be considered core business rather than an add on or afterthought, particularly for agencies that service a significant cohort of Aboriginal and Torres Strait Islander

¹ Productivity Commission – Draft Background Paper National Indigenous Evaluation Strategy May 2020

communities. These agencies need to work harder to establish trust and credibility with Aboriginal and Torres Strait Islander communities as a starting point, in order to have any chance of delivering upon the aims and objectives of this strategy.

All evaluation stakeholders need to get better at understanding and defining what success means and looks like for Aboriginal and Torres Strait Islander communities. This can only be achieved by Aboriginal and Torres Strait Islander people having a voice and having an active role in decision making. It should be acknowledged that the community's perception of success rarely aligns to what government's perceive. There needs to be a genuine commitment by government to relinquish control and to adopt an Aboriginal and Torres Strait Islander lens in determining priorities and key focus areas.

SNAICC strongly advocates for an increased focus on initiatives that will support Aboriginal and Torres Strait Islander children and young people to have a greater voice and role in defining what success means to them and thereby participating in planning discussions to devise more effective and responsive evaluation methodologies that focus on capturing outcomes that are relevant to Aboriginal and Torres Strait Islander children and families at a community level.

Recommendations

SNAICC puts forward the following Recommendations to the Productivity Commission, to refine the draft National Evaluation Strategy:

Recommendation 1: That the Strategy is supported by increased investment in targeted cultural competency training and capacity strengthening of key government agencies to build effective and trusted relationships with Aboriginal and Torres Strait Islander stakeholders, sectors and communities as a critical starting point. It cannot be assumed that success and improvements will occur organically, within existing resource constraints or by simply applying greater effort or focus on it as a mere objective.

Recommendation 2: That the new Office for Indigenous Evaluation design and administer a merit based independent assessment tool to assess existing capacity and evaluation proficiency amongst key government agencies, including measuring them against fundamental aspects such as cultural competency.

Recommendation 3: Establish minimum Aboriginal and Torres Strait Islander employment targets for staffing the OIPE, including ensuring that it's Chief Executive or leader is an Aboriginal and/or Torres Strait Islander person.

Recommendation 4: Require that the Indigenous Evaluation Council have 100% Aboriginal and Torres Strait Islander membership, in line with the principle of self-determination.

Recommendation 5: That the strategy includes an additional action to invest in and support the capacity of Aboriginal and Torres Strait Islander community-controlled agencies to monitor and evaluate their programs and contribute to broader government agency evaluation processes.



Recommendation 6: That the proposed Office of Indigenous Evaluation administer a dedicated fund for increasing the evaluation capacity of Aboriginal and Torres Strait Islander community-controlled agencies.

Recommendation 7: That the strategy includes an additional action to support the development of Aboriginal and Torres Strait Islander community or regional level structures and capacity to increase access to and use of evaluation and outcomes data to inform policy and program design locally. Given the cross-cutting nature of this action, it could be best led by the proposed Office of Indigenous evaluation.

Proposed Principles

The overarching principle for the Strategy is: **Centering Aboriginal and Torres Strait Islander people, perspectives, priorities and knowledges.** SNAICC is supportive of this overarching principle and considers it essential to enabling better evaluation outcomes, particularly in the child and family services sector.

To properly incorporate this overarching principle, agencies and practitioners will need to demonstrate a genuine commitment to strengthening their existing relationships and networks with Aboriginal and Torres Strait Islander communities. This is no small undertaking.

- **Recommendation 1:** That the Strategy is supported by increased investment in targeted cultural competency training and capacity strengthening of key government agencies to build effective and trusted relationships with Aboriginal and Torres Strait Islander stakeholders, sectors and communities as a critical starting point. It cannot be assumed that success and improvements will occur organically, within existing resource constraints or by simply applying greater effort or focus on it as a mere objective.

Delivering on this principle will require all levels of government to undertake a new dialogue with Aboriginal and Torres Strait Islander communities, ensuring that communities have clear pathways and opportunities to articulate their own locally led and defined aspirations. This needs to be supported in a systemic way and on a broad scale rather than in any half-hearted or tokenistic sense. Agencies and stakeholders will need to be increasingly mindful of the diverse nature of Aboriginal and Torres Strait Islander communities both geographically and culturally. While the conversation about evaluating policies and programs affecting Aboriginal and Torres Strait Islander people is often focused on those living in remote communities, most of the Aboriginal and Torres Strait Islander population (81.3 per cent) live in major urban or regional cities².

Outcomes and opportunities for Aboriginal and Torres Strait Islander people are typically very different between urban, regional and remote locations. For example, the circumstances of Aboriginal and Torres Strait Islander people living in inner Sydney are likely to be very different to those living in Central Australia.

² Steering Committee for Review on Government Service Provision, 2019

Co-design is an important approach to incorporating Aboriginal and Torres Strait Islander people, perspectives, priorities and knowledges into evaluations. The term co-design is often confused with 'consultation'. Genuine co-design requires a commitment for agencies to engage the perspectives of Aboriginal and Torres Strait Islander people from the very beginning of the evaluation spectrum to the very end.

Evaluation is often an afterthought rather than built into policy or program design. Agencies will need to ensure that Aboriginal and Torres Strait Islander communities are afforded an opportunity to co-design evaluation methodologies at the inception phase, rather than as a consultative component to inform research and evidence.

This includes the opportunity to define the outcomes and measures that are important to Aboriginal and Torres Strait Islander people, rather than only responding to government defined goals and targets. There needs to be more clarity about how agencies will be required to demonstrate this in a practical, tangible, meaningful and transparent way. SNAICC is supportive of the secondary principles mentioned within the Strategy, namely that evaluations are credible, useful, ethical and transparent.

A 'maturity approach'

A 'maturity' approach recognises the existing landscape and relative limitations of existing agencies and evaluation practitioners. SNAICC is supportive of this approach as it recognises that agencies and practitioners have differing levels of existing capacity, knowledge, experience and expertise.

The current draft strategy implies that agencies will need to self-assess their current evaluation and engagement practices and look for areas where improvements can be made. Given the recognised deficiencies in evaluation and cultural capability of government agencies, it seems unlikely that self-assessment would be accurate and fully scrutinise existing practices with a critical lens. It would be more worthwhile to apply an independent, merit-based assessment mechanism. Independent assessment would ensure that agencies don't overestimate their current capabilities on the maturity spectrum.

- **Recommendation 2:** That the new Office for Indigenous Evaluation design and administer a merit based independent assessment tool to assess existing capacity and evaluation proficiency amongst key government agencies, including measuring them against fundamental aspects such as cultural competency.

This merit-based assessment could potentially be administered or supported by practical tools and resources developed by the 'Office of Indigenous Policy Evaluation (OIPE)' in their role of 'monitoring agencies performance' against the Strategy. The development of such tools would result in greater consistency in the way that existing capabilities are assessed across a broad range of agencies.

SNAICC is very supportive of the establishment of a central clearinghouse for the body of evidence on the effectiveness of policies and programs affecting Aboriginal and Torres Strait Islander people.

Learning from the successes of other agencies will be important for supporting better evaluation practice and cultural change.

While agencies will initially be placed differently in terms of evaluation and engagement maturity, those agencies responsible for policies and programs that have a significant impact on Aboriginal and Torres Strait Islander people, or that are focused on outcomes that are of high priority to Aboriginal and Torres Strait Islander people, should seek to move quickly towards improving the maturity of their practices. For example, the National Indigenous Australian's Agency should ideally sit at Stage 4 of the stated maturity spectrum. Investments need to be targeted to ensure that critical agencies receive priority access to available resources and support.

SNAICC anticipates that a merit-based assessment would reveal that many Australian government agencies would currently fall within Stages 1 or 2 of the stated maturity spectrum. Significant resources and efforts need to be targeted at cultural competency and workforce development to support agencies fundamentally, before they can realistically progress through the spectrum. It cannot be assumed that this will occur organically, within existing resource constraints or by simply applying greater effort or focus on it as a mere objective.

Proposed Office of Indigenous Evaluation

SNAICC is supportive of the establishment of the proposed Office of Indigenous Policy Evaluation (OIPE). It is acknowledged that the Office would oversee the implementation of the Strategy and coordinate a whole-of-government approach to evaluating policies and programs affecting Aboriginal and Torres Strait Islander people.

SNAICC acknowledges plans for the office to sit within an existing independent statutory authority in its establishment phase however would be supportive of the office being a standalone independent authority into the future. SNAICC is supportive of the OIPE promoting a culture of accountability and requiring agencies to demonstrate their active efforts in adopting the key principles and actions within the Strategy.

- **Recommendation 3:** Establish minimum Aboriginal and Torres Strait Islander employment targets for staffing the OIPE, including ensuring that its Chief Executive or leader is an Aboriginal and/or Torres Strait Islander person.

Oversight of the Strategy should also include governance arrangements that ensure effective engagement with Aboriginal and Torres Strait Islander people more generally and on an ongoing basis. SNAICC acknowledges the current proposal to establish an Indigenous Evaluation Council with majority Aboriginal and Torres Strait Islander membership, however, the Council would be better aligned to the recognised principle and right of self-determination if all members were Aboriginal and/or Torres Strait Islander.

- **Recommendation 4:** Require that the Indigenous Evaluation Council have 100% Aboriginal and Torres Strait Islander membership, in line with the principle of self-determination.

This would not preclude the proposed Council from seeking expert advice and contributions from non-Indigenous individuals and agencies that are respectful partners with Aboriginal and Torres Strait Islander people in establishing effective evaluation systems and practice. It would represent a genuine commitment of the Australian government to ensuring self-determination and it would go a long way to ensuring that the overarching principle of this Strategy is delivered upon.

Proposed evaluation priorities

The draft Strategy nominates the following draft priority focus areas:

Priority 1: Families, children and youth Aboriginal and Torres Strait Islander children thrive in their early years, and Aboriginal and Torres Strait Islander families and households are safe

Priority 2: Health Aboriginal and Torres Strait Islander people enjoy long and healthy lives, and Aboriginal and Torres Strait Islander children are born healthy and strong

Priority 3: Education Aboriginal and Torres Strait Islander students: succeed at school; stay in school; and reach their full potential through further education pathways

Priority 4: Economic Development Aboriginal and Torres Strait Islander youth are engaged in employment or education, and strong Aboriginal and Torres Strait Islander workforce participation

Priority 5: Housing Aboriginal and Torres Strait Islander people secure appropriate, affordable housing as a pathway to better lives

Priority 6: Justice, including youth justice Aboriginal and Torres Strait Islander people are not overrepresented in the criminal justice system

Priority 7: Land and waters Aboriginal and Torres Strait Islander peoples' land, water and cultural rights are realised

SNAICC notes that the priorities have significant and important alignment to the new National Agreement on Closing the Gap that has been developed with Aboriginal and Torres Strait Islander people and with the Aboriginal and Torres Strait Islander Child and Family Wellbeing Framework that SNAICC developed in consultation with its members.

SNAICC is very supportive of the **cross-system priority** which aims to: Address racism, discrimination and social inclusion, healing and trauma, and the promotion of culture and language for Aboriginal and Torres Strait Islander peoples. However, the government's intended approach to this priority is not clearly articulated in the existing draft strategy. Further work needs to be undertaken to define how this will be delivered upon. Aboriginal and Torres Strait Islander people need to have a strong voice in determining how to approach this objective.

SNAICC is supportive of the Productivity Commission aligning evaluation priorities with priorities of the Closing the Gap Agreement. It will be critical for the government to genuinely include Aboriginal and Torres Strait Islander people in the design approach to this work.

The prospective Indigenous Evaluation Council and Office for Indigenous Policy Evaluation should be enabled to provide accountability and oversight to agencies, including a requirement for the work to be undertaken with full transparency - as per one of the key guiding principles within the Strategy.

Gaps - Priority Actions

SNAICC is generally supportive of the priority actions identified in the draft strategy, however, believes that there are two significant gaps that the draft strategy currently fails to fully address, namely:

Gap 1: Building evaluation capacity of Aboriginal and Torres Strait Islander community-controlled services

Though the strategy is targeted at the evaluation practice of government agencies, quality evaluation practice that is led by Aboriginal and Torres Strait Islander communities requires the opportunity and capability of community-controlled agencies to participate in evaluation of the programs they deliver.

The data that is available to inform government agencies in their evaluations is highly dependent on whether Aboriginal and Torres Strait Islander agencies have the resources and skills needed to monitor and evaluate their programs. There is a recognised large gap in the availability of evaluation of community-designed and led service approaches for Aboriginal and Torres Strait Islander people that has resulted in an over-reliance on international evidence-based practice that is not relevant / effective for Aboriginal and Torres Strait Islander communities.

Community-controlled agencies are also critical holders of the cultural knowledge and understanding required to evaluate Aboriginal and Torres Strait Islander programs effectively, and the knowledge they contribute must be valued and resourced.

Reflecting this priority, SNAICC has worked to develop an Evaluation Readiness Toolkit in consultation with our members that supports Aboriginal and Torres Strait Islander agencies in developing the capability to monitor and evaluate the progress of their community-led and designed programs³. While this toolkit has proved highly valuable when SNAICC has facilitated monitoring and evaluation development with agencies, broader uptake has been limited because community-controlled agencies lack the necessary resources and supports to use and implement it.

- **Recommendation 5:** That the strategy includes an additional action to invest in and support the capacity of Aboriginal and Torres Strait Islander community-controlled agencies to monitor and evaluate their programs and contribute to broader government agency evaluation processes.
- **Recommendation 6:** That the proposed Office of Indigenous Evaluation administer a dedicated fund for increasing the evaluation capacity of Aboriginal and Torres Strait Islander community-controlled agencies.

³ https://www.snaicc.org.au/wp-content/uploads/2019/10/1070_SNAICC-7-Steps-Evaluation-Toolkit-2019.pdf

Gap 2: Building evaluation capacity and supporting data ownership of Aboriginal and Torres Strait Islander communities

Currently there are limited structures and supports at local and regional levels that enable communities to access and use data relating to outcomes for Aboriginal and Torres Strait Islander people. A key goal of the evaluation strategy should be to build local Aboriginal and Torres Strait Islander communities' ownership of their own data and capacity to guide policy and program responses based on evaluation and outcomes data. This capacity is critical in shifting power in how evaluation data is used and responded to from its traditional place as the exclusive domain of government to an approach based on self-determination and aligned to the principles articulated in the draft strategy.

SNAICC acknowledges that this is a complex undertaking. There is not a one size fits all community structure for accessing and responding to evaluation data, and in many cases these functions need to be integrated with existing structures of Aboriginal and Torres Strait Islander community and sector leadership. For example, in the children and families space, many communities have Aboriginal and Torres Strait Islander early childhood network or advisory groups that meet regularly to discuss priorities for early development and to plan and coordinate supports for children in the early years. SNAICC is aware from its work with communities that groups such as these lack the evaluation and outcomes data that they need to fully understand need and service impact to inform their planning for improved responses or their input to policy development.

An example of an important initiative in early development is the work of the Queensland Aboriginal and Torres Strait Islander Child Protection Peak with the Queensland Government to develop 'catchment profiles' of outcomes data and progress indicators for children and families aligned with the coverage areas for Aboriginal and Torres Strait Islander Child and Family Wellbeing Services.⁴ Work has also been undertaken through the Aboriginal Children's Forum in Victoria to increase accountability and Aboriginal decision-making by making regional data available to Aboriginal service providers so that progress on the Wungurilwil Gagapduir: Aboriginal Children and Families Agreement, can be overseen by Aboriginal people.

While progress has been made through these efforts, stakeholders have also identified significant limitations where government data is not available or is not provided in a timely way about the programs and outcomes they want to track – a greater commitment by governments to change and improve datasets with Aboriginal and Torres Strait Islander people is vital to success. Initiatives like these are critical to increase data that is available on outcomes locally to inform local decision-making and increase accountability of governments and services to the Aboriginal and Torres Strait Islander communities that they work with.

- **Recommendation 7:** That the strategy includes an additional action to support the development of Aboriginal and Torres Strait Islander community or regional level structures and capacity to increase local transparency of, access to and use of evaluation and outcomes data to inform policy and program design locally. Given the cross-cutting nature of this action, it could be best led by the proposed Office of Indigenous evaluation.

⁴ SNAICC (2019) *The Family Matters Report 2019*, p21, available at: https://www.familymatters.org.au/wp-content/uploads/2020/02/1097_F.M-2019_LR.%C6%92updated.pdf

Feedback - Priority Actions

Action 1: Agencies should systematically identify evaluation priorities and publish evaluation forward work plans

SNAICC is supportive of this action and endorses the requirement for Australian Government departments and large agencies to release, on an annual basis, a rolling Three Year Evaluation Forward Work Plan, which should detail:

- How Aboriginal and Torres Strait Islander people, perspectives, priorities and knowledges were centred as part of the prioritisation process
- Policies and programs within their portfolio that contribute to government-wide evaluation priorities aimed at improving the lives of Aboriginal and Torres Strait Islander people
- The methodology for how the agency categorised the high priority policies and programs (based on the above criteria)
- A plan for how/when over the next three years the agency's identified policies and programs will be evaluated (or how they will become ready for evaluation).

Action 2: New policies and programs affecting Aboriginal and Torres Strait Islander people should be subject to an Indigenous Evaluation Threshold Assessment

SNAICC is supportive of this proposed requirement. This process needs to be streamlined with a focus on minimising administrative burdens and associated red tape for agencies.

Action 3: The Office of Indigenous Policy Evaluation should provide guidance to agencies on conducting evaluation in line with the principles of the Indigenous Evaluation Strategy

SNAICC is supportive of this action. In addition to 'guidance' the Office for Indigenous Policy needs to have authority to highlight poor evaluation practice on a systemic scale and to ensure a level of compliance and accountability amongst agencies to demonstrate a commitment to executing evaluations in line with the key principles of the Strategy.

Action 4: Agencies, supported by the Head of Evaluation Profession, should ensure they have access to the skills they require to undertake or commission evaluations that are consistent with the Strategy

In addition to providing training and support, The Head of Evaluation Profession should develop a strategy to build a cohort of Aboriginal and Torres Strait Islander evaluators within the APS as a top priority. This would result in sustainable and long-term improvements.



Action 5: Agencies should ensure that they have access to, or are able to collect, the data they need to effectively undertake evaluations under the Strategy Good data are essential for high-quality evaluation.

The collection of better and more relevant data sets will be essential to improving evaluation outcomes. Agencies need to concentrate on developing trusted relationships with local Aboriginal and Torres Strait Islander communities, particularly to strengthen their capacity to gather improved qualitative data.

In approaching this work, agencies need to have regard for working through appropriate Indigenous data governance arrangements, including partnering with Aboriginal and Torres Strait Islander people in the development, collection, use and management of data. The 'ethical and transparent' guiding principles are essential to undertaking this work effectively.

Action 6: A data dictionary should be developed to guide agencies on collecting and using data on core outcomes that are important for Aboriginal and Torres Strait Islander people

SNAICC is supportive of the proposal for the Australian Institute of Health and Welfare to work in partnership with Aboriginal and Torres Strait Islander people to develop and validate core indicators relevant to Aboriginal and Torres Strait Islander people that agencies can use when collecting data for monitoring and evaluation. There should also be data collection guidance for agencies that outlines ethical and cultural good practice.

Action 7: All evaluation reports should be published

SNAICC is highly supportive of this action which is critical to ensure transparency and enable evaluation findings to inform better system and service design. There may be circumstances where evaluation reports need to be redacted due to privacy or cultural sensitivity – but the decision to withhold evaluation outcomes data for these reasons must sit with the communities that the data is about and for, and not with governments.

Action 8: Agencies should publish an accessible evaluation report summary

SNAICC is strongly supportive of agencies providing timely and transparent feedback to stakeholders, most importantly Aboriginal and Torres Strait Islander communities. These reports need to be presented in plain English and in a way that is relevant to Aboriginal and Torres Strait Islander communities.

SNAICC is supportive of some reports being translated into traditional language in circumstances where English is not the first language for Aboriginal and Torres Strait Islander communities, including but not limited to those in the top end of Queensland, Torres Strait Islanders, Northern Territory and some parts of Western Australia and South Australia. SNAICC staff regularly receive



feedback from these communities regarding their relative inability to actively engage in evaluation processes due to language barriers.

Action 9: A central evaluation clearinghouse should be established

SNAICC is supportive of the establishment of a centralised evaluation evidence clearinghouse that is easy to navigate. This will promote effective sharing of good evaluation practice and will encourage a culture of information sharing and transparency. This will also provide a mechanism that will assist agencies to transform evaluation evidence into evidence-based approaches to program and policy development.

Action 10: Agencies should publish a response to evaluation findings

This action is critical in terms of transparency and will promote a culture of accountability. It will ensure that evaluations are focused on outcomes, as agencies will be aware up front of their responsibility to respond to evaluation findings. Agencies should also be required to report on how Aboriginal and Torres Strait Islander people have been involved to determine what the response to evaluation findings should be.

Action 11: Agencies' performance against the Strategy should be monitored by the Office of Indigenous Policy Evaluation

SNAICC is strongly supportive of this action to promote accountability. The new office needs to be provided with enough resources to provide critical oversight, leadership and support to the sector, in order to achieve a positive impact.

Action 12: The Strategy should be subject to independent review after five years

Any prospective review needs to primarily include Aboriginal and Torres Strait Islander people in all phases, from inception to completion. This is essential to ensure that the overarching principle of the Strategy is upheld.