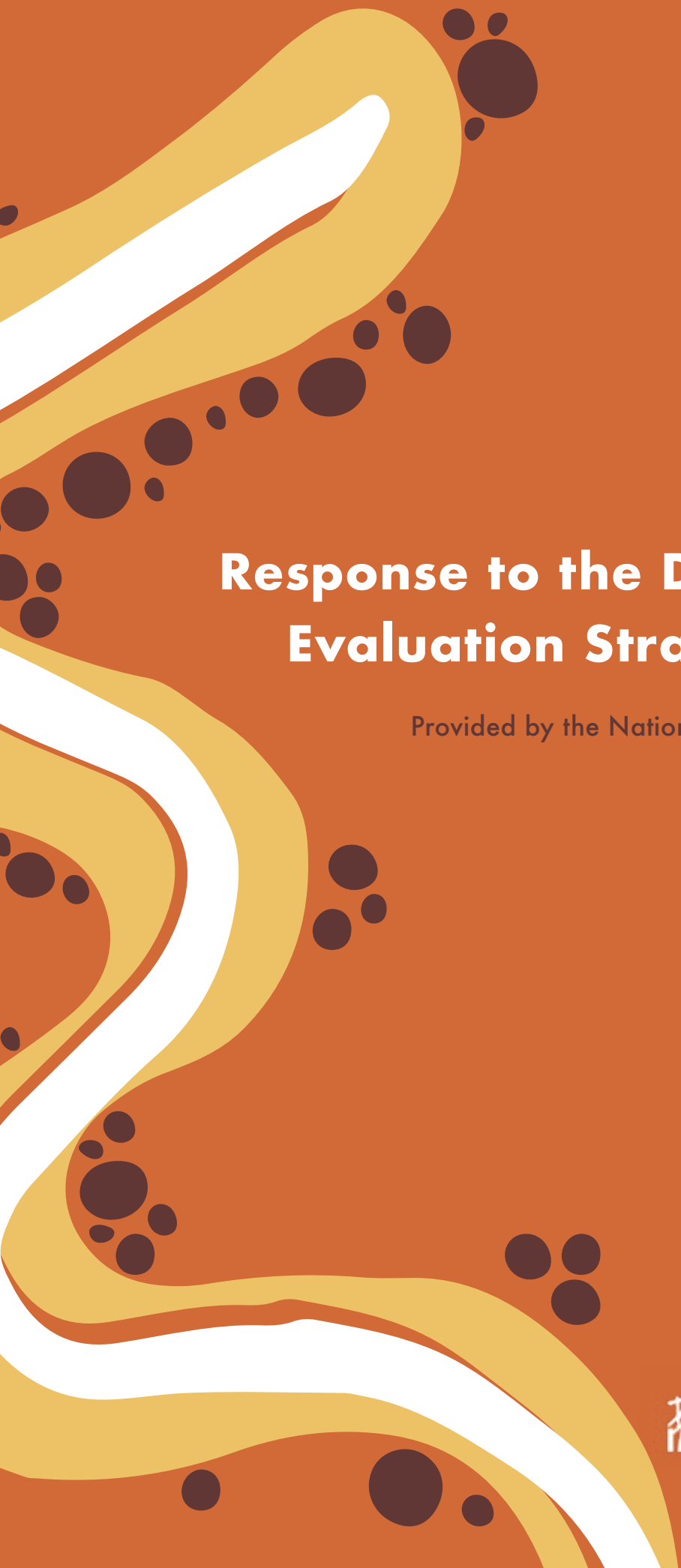
Response to the Draft Indigenous Evaluation Strategy and Guide

Provided by the National Centre of Indigenous Excellence
to the Productivity Commission



Black IMPACT | NATIONAL CENTRE OF INDIGENOUS EXCELLENCE

Response to the Draft Indigenous Evaluation Strategy and Guide

Foreword

The National Centre of Indigenous Excellence (NCIE) welcomes the creation of the Indigenous Evaluation Strategy (the Strategy), as well as the opportunity to provide feedback on its Draft and Guide. NCIE's programs, services and enterprises are designed with the sole purpose of creating long-term improvements in wellbeing. NCIE takes a strengths-based approach - with culture at the core - to deliver outcomes. We start from a place of excellence and build from a foundation of positives. We recognise and celebrate the existing and emerging strengths and assets in Aboriginal and Torres Strait Islander communities. We hope that through the development, implementation and continual evaluation of this strategy, Aboriginal and Torres Strait Islander communities will be empowered and equal decision-makers at every level of policy or program development, implementation and review.

The Productivity Commission should be commended for its work in drafting this Strategy. The Strategy in and of itself is demonstration that steps are being taken to acknowledge the fundamental flaws of the past and the vital need to decolonise evaluation practice in Australia.

Authors

This submission was drafted collaboratively by a group of cross-cultural practitioners operating as consultants for evaluation, social justice, system change and policy. The submission was led by Blak Impact at NCIE. When drafting this response, the authors considered how the Draft Strategy would sit within the current environment, how it may address core areas of system change and social justice, and whether the contents of the Strategy are sufficient to ensure that the voice of Community is meaningfully centred and amplified.

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Executive Summary

The creation and implementation of the Draft Indigenous Evaluation Strategy ('the Strategy') is an important step in addressing the ongoing systemic and systematic inequality faced by the Aboriginal and Torres Strait Islander Community. It is imperative that this opportunity does not fall short of making the change it desires and that is required to deliver substantive change. The Strategy must not only articulate the mechanics of the Strategy; it must also articulate the mindset that is essential to effective and meaningful evaluation. In addition to this, the Strategy must create opportunities for First Nations' agency in problem-defining and solution-making. There must be a shift from a 'government led - knows best' (and in its worst form 'saviour') mentality to enabling and empowering Aboriginal and Torres Strait Islander people to create solutions for their own communities. Additionally, the Office of Indigenous Policy Evaluation (OIPE) should be vested with powers and functions to compel agencies to complete evaluations in line with the Strategy. Throughout the development of this Strategy, we must keep interrogating its true purpose, its intended audience and whether or not it is facilitating the shift in power required to empower community voice.

Recommendations

We recommend the following steps be undertaken to address these issues:

- There is a need to shift the proposed approach from bringing community in at key moments, to embedding true co-design[1] practice. This should occur from the initial problem or opportunity definition phase that is informing policy and program design. As it stands, the Strategy fails to apply this critical approach. Policies and programs will continue to achieve poor outcomes if they are primarily centred around and prioritise solutions to government defined problems. This step is crucial for policy or program success.

- Problem and opportunity defining must be based on the values, beliefs and worldviews of the population that programs or policy are intended to serve. This means a shift away from agency agenda-setting to a model where communities are leading policy and program design as well as its implementation, monitoring and evaluation.

- Context setting for the Strategy needs to be more explicit and address the importance of underlying worldviews in evaluation. This is crucial as worldviews determine 'values' and values underpin evaluations.

- The values of Indigenous communities must also underpin evaluation frameworks, design and implementation.

1 https://www.aboriginalaffairs.nsw.gov.au/pdfs/new-knowledge/Weaving-Knowledges-codesign-report-FINAL.pdf

- We believe that there is benefit in clearly articulating a set of principles that need to be complied with in order to ensure that community values and voice are squarely at the centre of evaluation design. These can be used to both guide activity and to test that it aligns with the desired practice. This then lays the foundation for a principles-based approach to evaluating the success of the Strategy itself over time.

- Embedding accountability mechanisms into the function of the Strategy and giving the OIPE authority to not only monitor implementation of the Strategy but to also hold agencies to account is essential.

The table seeks to articulate what shifts in mindset are needed for First Nations' perspectives, priorities and knowledges to underpin evaluation and policy design and implementation, in order for it to be done well and to support real change on the ground.

Table 1. Where we are and where we need to be in our journey to de-colonising and Indigenising evaluation

Current	Proposed
Indigenous knowledges, perspectives and priorities are not given primacy or value	Indigenous knowledges, perspectives and priorities are given primacy and are valued
Agencies lead problem and solution definition Agencies lead policy or program design with elements of community	Communities lead problem and solution definition
	Agency staff have the understanding and skills to be able to co-design policies, programs and evaluations with Aboriginal and Torres Strait Islander communities and work constructively with them to do that
Evaluation frameworks are not culturally grounded, data and evidence are defined in predominantly western terms, community members and approaches are not used to make sense of data or inform how it is shared and communicated	Indigenous data sovereignty is respected, and communities are involved in determining what constitutes data and how it is analysed, used and shared
Evaluation reports are drafted for both government and community audiences Agencies lack resourcing to ensure true collaboration in evaluation design, implementation and provision of feedback to affected / participating communities on evaluation outcomes	Evaluation reports are drafted for government audiences
	Agencies are resourced to ensure true collaboration in evaluation design, implementation and provision of feedback to affected / participating communities on evaluation outcomes
Government does not place priority on ensuring that Aboriginal and Torres Strait Islander evaluators / researchers are engaged in the evaluation of projects focused on Aboriginal and Torres Strait Islander communities The role of community researchers is not appreciated or leveraged	Evaluation design and implementation includes Indigenous research & evaluation partners as a matter of standard practice
	Aboriginal and Torres Strait Islander forms of knowledge and sensemaking are used to identify, gather, provide and analyse data
	Community researchers are valued and investments are made to support community members to take up this role
Agencies lack the understanding, skills and networks to be able to engage effectively with Aboriginal and Torres Strait Islander communities There are not enough Aboriginal and Torres Strait Islander evaluators / researchers	Structures are funded and in place to support genuine community engagement
	Sufficient resourcing is provided to facilitate the development of Indigenous evaluators and researchers based in communities to support external evaluators and Government when undertaking evaluations

Overview Of Submission

Our findings and recommendations are articulated through three streams of thinking:

Chapter 1. Overall systemic change: We note that evaluation practice has historically been uniformly Western in its orientation. It is worth acknowledging that building Indigenous evaluation practices should ideally involve concepts from multiple cultures. Our fear is that the practice of evaluation in Indigenous contexts still relies on Indigenous peoples becoming 'bi-cultural', without an associated reciprocal change in orientation from their neighbouring cultures. Evaluators and policy makers have been grappling with these issues for over 40 years, both theoretically and practically, and across a range of contexts. In this section, we discuss why it is not enough to simply articulate the Strategy. There needs to be an articulation of the changes in individual and organisational mindsets, understanding, skills, practices, processes and systems required to enable the implementation of the Strategy.

The strategy does not acknowledge the systematic changes needed to realise the Strategy. It is not enough to articulate the Strategy; there needs to be an articulation of the changes in individual and organisational mindsets, understanding, skills, practices, processes and systems required to enable the implementation of the Strategy. This should also include steps to address those changes. The authors advocate for a strengths-based approach to all practice, policy or program design, implementation and evaluation.

Chapter 2. Embedding Community voice in every stage of the evaluation cycle: This is our 'joining the chorus section'. Here we acknowledge and affirm our understanding of and commitment to what is known about best practice in Indigenous evaluation contexts and the need to centre and amplify the voice of Community, whilst valuing the context in which Community determine this. The Draft Strategy and Guide are highly technical documents that lack practical mechanisms for embedding Community voice in every stage of the evaluation cycle. This type of highly technical approach will continue to lead to a lack of true partnerships with communities. The Strategy must therefore clearly articulate the mindset shift as well as the practical requirements needed to achieve these partnerships. Incorporating this will ensure that the ongoing implementation of the Strategy embeds true partnerships and collaboration models for community involvement. It will also ensure that these elements have sufficient focus and resourcing to enable the implementation of the Strategy.

The Draft Strategy and Guide are highly technical and fail to include the practical steps and investment required for embedding Community voice in every stage of evaluation design. Incorporating the mindset shifts and practical requirements needed for partnerships will ensure that the ongoing implementation of the Strategy embeds true partnerships and collaboration models for Community involvement, and that these are given sufficient focus and resourcing. The OIPE must have consultancy mechanisms and resources to develop Community researchers/consultants.

Chapter 3. Changes to governance and accountability mechanisms overseen by the OIPE: This section acknowledges the liminal space we believe exists – where strategies are developed but where implementation that is reflective of the spirit of the Strategy falls short. We included this section because our collective experience has shown us that organisations are typically better at articulating best practice in working with Indigenous peoples than they are at implementing it. This is important to consider when developing a strategy and proposed accountability measures, because appropriate implementation of the Strategy and effective lines of accountability are critical to its success for Community.

Accountability and compliance frameworks are not sufficiently defined to ensure that the Strategy is actioned in a meaningful way. Non-compliance with Strategy procedures must be met with disciplinary sanctions to ensure accountability.

We have also provided detailed responses to each of the Actions identified in the Strategy in Appendix 1.

Stream 1. Overall Systemic Change

Embedding Community voice in every stage of the evaluation cycle

The role of culture in evaluation is crucial as it underpins values, processes, findings and, ultimately, outcomes. Within evaluation, the processes of information exchange, interpretation and application of knowledge are significantly influenced by the cultures of evaluation participants, including the evaluator.[2] Within this Strategy, there must be a shift to valuing and centring Indigenous knowledges and perspectives in evaluation design and implementation. It must reflect the ways of knowing, doing and being of the Communities that the program or policy is designed to serve. It is impossible for an evaluation to be meaningful to a Community if the worldviews that underpin and impact on the evaluation are not expressly acknowledged and questioned.

In the table we outline how culture influences the different phases of evaluation design:

2 Lee, K. 2007 The Importance of Culture in Evaluation: A Practical Guide for Evaluators. The Colorado Trust., USA. pp. 2 quoted in Hill, R & Vaughan, L., 2017, 'Design for Social Innovation Impact Evaluation Study' Design and Creative Practice, Enabling Capability Platform, RMIT University.

Table 2. How culture influences the work/What that influences

	How culture influences the work	What that influences
Engaging	• How we see, experience, understand an issue / opportunity • How we perceive a particular project • How we view its relevance and importance to us • Whether we feel respected, welcomed and safe to participate in it • Whether we trust it will be done "the right way" and that our voices will be heard • How we participate in a project, what we share, with whom, how, when	• Timeframe • Relevance • Relationship • Respect • Power • Participation
Framing	• How we understand / define an issue / opportunity • What we value as being a desirable outcome, what we give primacy or priority to • How we define "the right way" of doing things, how we make decisions	• Perception • Priorities • Decision-making
Sensemaking	• What knowledge we bring and how that is conveyed • What criteria we apply to make decisions or determine success • What forms of evidence we pay (most) attention to • How we explore and test ideas and perspectives • How we manage conflicts and difference	• Knowledge • Evidence • Analysis • Interpretation
Communicating	• How we convey and share information • What is said, what is not said, by and to whom	• Language • Meaning

Many Indigenous researchers and evaluators argue that evaluations of Indigenous programs – particularly in Australia – are usually conducted without acknowledging the values and principles that inform and / or ought to inform the evaluation framework, design, implementation and outcomes.[3] This has meant that the values and principles that inform evaluation design in relation to programs in Indigenous Communities – both in Australia and elsewhere – are not usually those of the Communities themselves, but represent those of the evaluators, mainstream organisations (including Government) responsible for the programs in question, and/or funding agencies.

3 Masters-Awatere and Waimarie Nikora, 2017; Scougall, 2006; Wepeihana, 2016; Smith, 1999; Taylor, 2003.

Recommendation

The proposed Strategy is complex and highly technical. Instead of such a technical approach, the Strategy should set out the requirement for evaluations to be Community owned and controlled. This is essential to ensuring that evaluation data is meaningful to the community. This includes communicating evaluation outcomes in accessible forms and in a way that ensures that communities can access and engage with these outcomes. In addition, each evaluation must have a tailored approach to consider and address the diversity throughout the Indigenous community.

In this Strategy there is also a lack of acknowledgement of Indigenous/non-Indigenous power imbalance. There needs to be explicit acknowledgement of underpinning worldviews in evaluation in order to address this imbalance.

Stream 2.

Embedding Community voice in every stage of the evaluation cycle

Including Community voices is essential throughout every stage of evaluation. This section of the submission seeks to ensure that this is recognised and responded to throughout the Strategy.

Some key points raised in this context are as follows.

- Currently, a 'majority' Indigenous 'Indigenous Evaluation Council' ('the Council') appears to be a principal mechanism in the Strategy for ensuring Indigenous engagement and participation in Indigenous evaluation. There is reference to this Council providing strategic direction to the OIPE on evaluation planning, partnering with the OIPE to recommend evaluation priorities for Government and engaging Community to inform the guidance it provides to the OIPE (see next point). It will be important to ensure that the Council is a strong and effective mechanism through which diverse First Nations voices can be heard and listened to.

- There is reference in the Strategy to the above Council engaging Community. This requires, in parts of the Strategy, further detail and clarification as to the nature, purpose and intended outcomes of this engagement. What are the specific or suggested 'pathways' to engaging Community? Examples of gaps in detail in this context are as follows:

    - The Council is to engage with Community to inform its guidance functions. There is no detail on how community engagement by the Council will occur.

    - There is reference to AIHW working with Community to develop a data dictionary. There is also no detail on how this will occur.

- In other parts of the Strategy, there is no explicit reference to the necessity for or importance of Community engagement where there ought to be. Examples of this include that First Nations peoples, particularly those impacted by a policy or program, may need to have a say in whether an evaluation is published in its entirety.

- *All* forms of engagement with First Nations peoples ought to be sufficiently resourced throughout all stages of evaluation. This may need to be more explicitly stated throughout the Strategy. For example:

    - First Nations peoples should have input into the factors outlined in Table 2. There must be sufficient resources (earmarked during evaluation planning) to ensure communities are able to do that so that the communities participating in and / or affected by the findings / outcomes of an evaluation are provided with this feedback through mechanisms identified by First Nations peoples as being most effective.

- First Nations peoples should be involved in the five-year review of the Strategy. What pathways are to be established to ensure that this occurs (other than through the Indigenous Evaluation Council)?

- Working in partnership with Communities requires sets of skills that we cannot assume those commissioning or conducting evaluations will have (where non-Indigenous). There is more to be said about this in the Strategy, for example:

  - There is reference to upskilling agencies to ensure 'evaluation capability', but there is no explicit reference to ensuring 'cultural capability' (though this is perhaps implied).

  - There is reference to 'support and resources' to be provided by the Head of Evaluation to build APS capability. Once again, this support and these resources ought to increase 'cultural capability', not just generic evaluation skills. Having 'generic' evaluation skills will not suffice in the context of Indigenous evaluation.

    Ideally, this support and these resources ought to be developed and provided by First Nations peoples and communities themselves.

- On two related notes:

  - There is also very little discussion of building on existing capability within Communities for Community members affected by a program to plan for and design its evaluation, or of community-led evaluation processes and outcomes (such as justice reinvestment). What is the 'pathway' for Communities who are seeking to carry out their own evaluations or who are seeking the evaluation of programs affecting them?

  - One key strategy for ensuring inclusion of Community (Indigenous) voices into evaluation processes and outcomes is to prioritise engagement of Indigenous researchers and evaluators, including Indigenous community researchers[4], in evaluation work. Those commissioning or planning for evaluation might identify Indigenous researchers, evaluators and community researchers through a resource created through the Strategy for that purpose.

  - The Strategy might somehow support and resource the development of a network of Indigenous community researchers.

  - Indigenous researchers and evaluators ought also to be represented on the Indigenous Evaluation Council.

4 Community members supporting research and learning on the ground at a grassroots level. Examples of this model have been used in a number of projects, including for example the 1000 days Project https://thousanddays.org/.

- Where Community engagement is especially crucial is at the evaluation planning stages, again perhaps requiring a more explicit statement within the Strategy as to nature, purposes and intended outcomes of this engagement – particularly in terms of what this might contribute in a data context.

    - Measures of effectiveness of programs are generally still predominantly Western. Evaluation indicators need to be relevant to communities affected by a policy / program being evaluated.

    - The Strategy also needs to be more explicit about the primacy of Indigenous data sovereignty principles applying to all data work associated with evaluation. It needs to set out what this means in practice, why Indigenous sovereignty principles are important (or essential), how these principles might be implemented, and so on.

Recommendations

1. All steps must be taken to strengthen the role of the Indigenous Evaluation Council as it carries out its functions within the Strategy. Consideration should be given to establishing a wholly First Nations Indigenous Evaluation Council. As an alternative, there must be processes in place that ensure majority First Nations voices are listened to and heard in the Council. Representation within the Council also ought to reflect diversity of First Nations peoples and communities (e.g. rural, urban, or sector-based), and include Indigenous researchers (evaluators).

2. The Strategy ought to more explicitly state how it will be creating pathways for community to work with government to co-design government planned evaluations and to support and encourage community-led evaluations. In parts of the Strategy, further detail and clarification around the necessity for, and the nature, purpose and intended outcomes of, community engagement are required. In this and other respects, community 'pathways' within the processes associated with the planning, carrying out, developing and producing outcomes through evaluation need to be more explicitly set out in the Strategy. Community must also be involved in the five-year review of the Strategy.

3. Community engagement in ALL stages of evaluation ought to be sufficiently resourced at the outset (from the point of identifying the need for an evaluation to its final stages, including dissemination of findings and implementation of outcomes).

4. Cultural capability is an essential skill for those planning, conducting and otherwise involved in Indigenous evaluation. Indigenous people ought to be involved in designing relevant resources and providing support to upskill APS staff, both of which are to be made available through the Strategy.

5. Existing capability in communities and of Indigenous researchers around identifying the need for, carrying out and implementing findings of evaluations ought to be more explicitly recognised in the Strategy, along with how this capability is to be acknowledged and strengthened through the Strategy. There needs to be recognition of the importance of having community researchers leading evaluation, and details need to be provided as to how community researchers might lead, be supported, upskilled and involved in evaluation.

6. It is essential to ensure that evaluation accesses and uses data that is reflective of, captures, and is developed and/or designed according to First Nations perspectives and with high levels of First Nations input. For this to happen, First Nations peoples affected by a policy or program to be evaluated must be engaged as early as possible, including at the planning stages of evaluation. The Strategy needs to be more explicit about the importance of First Nations input as well as setting out the processes that should be used to ensure First Nations input, including those affected by the policy or program, into all data-related processes.

Stream 3.

Changes to accountability mechanisms overseen by OIPE

In order to achieve successful adoption of this Strategy, overall systemic and cultural change must occur. As the Strategy correctly identifies, this is difficult to achieve. To oversee this, the OIPE should not only provide guidance on how agencies should implement the Strategy, they must be vested with powers that compel agencies to adopt the systemic changes required to successfully achieve these overall behavioural shifts. The OIPE should have authority to not only monitor agency implementation of the Strategy and provide guidance; it must be able to hold agencies to account at the different stages of implementation. There is little discussion throughout the Strategy as to how Government agencies can ascend the maturity ladder, whilst also being held accountable. As agencies ascend the maturity ladder, further guidance should be provided by the OIPE.

We believe the OIPE should be vested with a similar authority, have similar powers and functions to those of the Auditor-General to audit agency performance against the Strategy.

Recommendations

We recommend that the OIPE create an Indigenous Evaluation Assessment Tool to be utilised by all agencies in the proposal stage of policy or program design. We recommend that agencies should be compelled to report their evaluation and program or policy design and implementation against the Strategy's Action Items. The OIPE should be empowered to review these agencies' actions and assess the quality of these actions. These assessments should be made available to the public. We recommend that agencies should be compelled to fully participate in all OIPE assessments. We also recommend the OIPE be vested with authority similar to the Auditor General in order to perform the following functions:

- Auditing the implementation of the Indigenous Evaluation Strategy by Commonwealth agencies with policies or programs that significantly impact Aboriginal and Torres Strait Islander People and Communities;

- Auditing annual performance of agencies against Strategy Action Items.

Conclusion

We affirm our support for the development of an Indigenous Evaluation Strategy and acknowledge the work that has gone into the current draft. We welcome the opportunity to provide feedback. We are keen for the final Strategy to provide a platform that will provide guidance on how to undertake the evaluation of policies and programs impacting Aboriginal and Torres Strait Islander people in a way that decolonises evaluation practice in Australia. In order to do that it must also identify and outline the supporting strategies needed to address the systemic changes that are required to achieve that, provide structures to support genuine community engagement and embed accountability structures to ensure that the Strategy is implemented effectively. If that is not done then we fear that the implementation of the Strategy runs the risk of becoming another 'tick-a-box' exercise that does not achieve meaningful change.

Appendix 1: Specific feedback on individual actions outlined in draft strategy

Action 1: Agencies should systematically identify evaluation priorities and publish evaluation forward work plans Chapters 1 & 2	• The Strategy does not address how ethics or Indigenous data sovereignty considerations are to be dealt with at the planning stage or the implications that they have for evaluation design and implementation. • Threshold Assessment and Prioritisation and Planning processes outlined in the Draft Guidelines require Agencies to take into consideration the 'perspectives, priorities and knowledges of Aboriginal Peoples' but do not define approaches or provide mechanisms through which this can be done or define principles that need to be adhered to when this is done to ensure that it is done in a meaningful way. • There is no mechanism for input by the Community in the design of evaluation processes.	• Provide foundational training for all Agency staff to build awareness, understanding and skill in culturally grounded policy and program design and evaluation. • Build this training into standard staff induction and development processes, requiring all staff involved in the design and evaluation of policies and programs having a significant or differential impact on Aboriginal or Torres Strait Islander Peoples to undertake the training. The training should include provision for co-design, ethics and Indigenous data sovereignty considerations. • Define principles (Effectiveness Principles) that ensure the 'perspectives, priorities and knowledges of Aboriginal Peoples' are appropriately embedded in the policy and program design process, the development of Evaluation Plans and the implementation of evaluations. These principles should include compliance with ethics and Indigenous data sovereignty principles • Specifically authorise and resource the Office of Indigenous Policy Evaluation (OIPE) to: • Provide advice and support to help Agencies to apply these Principles when developing and implementing Evaluation Plans • Review and audit Agency compliance with Effectiveness Principles • Require revisions of Agency Evaluation Plans where Principles are not complied with • Promote and showcase exemplary practice to help strengthen and embed good practice • Identify cases where evaluations do not comply with the Principles and

		and require Agencies to respond to the concerns raised (with concerns and responses being published alongside the evaluation). • Embed mechanisms that Agencies can access while engaging Communities for their input into their Threshold Assessments and Evaluation Plans

Action 2: New policies and programs affecting Aboriginal and Torres Strait Islander people should be subject to an Indigenous Evaluation Threshold Assessment Chapter 1	• The Strategy does not define what it means for a policy or program to 'have significant and/or differential effect on Aboriginal or Torres Strait Islander People.' • The Strategy does not reference how existing and ongoing programs will be evaluated • The Strategy's current model is highly technical - rather than relational and context based. • Processes must ensure access to 'good' data • Evaluators with technical and cultural capability are essential to support good evaluation practice.	• Provide a definition of what it means for a policy / program to 'have a significant/ differential effect on Aboriginal People', ensuring that the definition acknowledges that the assessment of significance needs to be culturally grounded to be meaningful. • Further consideration must be given to negotiating differences of opinion in value setting. • There must be diverse perspectives in the assessment process. E.g rural, regional, rural and sector-based perspectives.

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 Chapter 3	• There is no definition of what guidance the OIPE will provide. • The role and authority of the OIPE is not sufficiently defined to ensure that the requirements of the Strategy are implemented in a meaningful way. • OIPE operations need to be less about process (ticking a box) and more focused on ensuring real partnership is embedded in this process.	• The OIPE must have power to compel Agencies to implement the Strategy properly into the program or policy design and implementation. • The OIPE must have authority to sanction non-compliance with 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 Chapter 3	• The Strategy does not identify how the work to be undertaken by the Head of Evaluation (HOE) will be coordinated with and informed by the OIPE. • The Strategy does not acknowledge how critical it is to ensure that the work of the HOE is appropriately culturally informed in this area. • The Strategy's evaluation indicators are still very Western. This must shift to accommodate Indigenous knowledges and perspectives. • The Strategy does not identify mechanisms for APS staff to engage with Community to ensure that their work is appropriately culturally informed and grounded. • The Strategy acknowledges the need to develop a cohort of Aboriginal and Torres Strait Islander evaluators within the APS. However, it does not acknowledge the value in supporting the development of Aboriginal and Torres Strait Islander Community Members as evaluators and community researchers outside of the APS.	• Evaluation indicators need to be relevant to context and will need to be built up over time. • There is a need to embed a structural mechanism beyond bureaucratic systems to set up clear pathways for seeking community perspectives. • Models or mechanisms for engagement with community should be identified in Guidelines. The OIPE should provide support to engage with them. • The Head of Evaluation should be required to consult with the OIPE in relation to the focus, design and implementation of strategies in this area. • The effectiveness of the above strategies should be monitored by the OIPE. • An Indigenous Person with skills in culturally grounded evaluation should be employed to undertake this work. • The Strategy should include the requirement to invest in developing the capacity of Aboriginal and Torres Strait Islander Peoples to support evaluation either directly as evaluators or as community co-design consultants or researchers. • Explicit reference should be made to the importance of ensuring that Aboriginal People are involved in the evaluation of policies and programs that have a significant or differential impact on Aboriginal People as a means of ensuring that cultural considerations are appropriately taken into account (whether that involvement be as evaluators, co-design consultants or community researchers).

		• Explicit reference should be made to the importance of ensuring that Aboriginal People are involved in the evaluation of policies and programs that have a significant or differential impact on Aboriginal People as a means of ensuring that cultural considerations are appropriately taken into account (whether that involvement be as evaluators, co-design consultants or community researchers). • Models or mechanisms for engagement with community should be identified in Guidelines and support to engage with them provided by the OIPE. • Capacity building priority also needs to include cross cultural capabilities and awareness. APS staff involved in Indigenous evaluations should be required to undertake an assessor's cross-cultural training course.

Response to 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 Chapter 2	• We agree with this Action • Although referenced, the Strategy does not provide adequate guidance on how to ensure that data is gathered, interpreted and used in a culturally safe manner. • Indigenous data sovereignty principles are not adequately explained. • Explicit consideration is not given to how cultural perspectives need to be considered when interpreting and making meaning out of data. • Community members need to be involved in the interpretation and/or making sense of data collected through an evaluation.	• A co-design process should make sure that Aboriginal and Torres Strait Islander people themselves decide whether reports should be published upfront. • Recognising that the scope of this strategy is limited to policy and program areas, not just those affecting Aboriginal and Torres Strait Islander Peoples, the Strategy should note that the principles of transparency and accountability should be uniformly applied.

Response to 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 Chapter 3	• While we understand the intention of this Action, we are concerned that the implementation of it could result in a data set that reinforces Western approaches to data definitions and continues to give primacy to quantitative measures where more nuanced measures are required.	• The OIPE should work with research and community partners to develop a repository that provides examples of how different types of data can and have been used to demonstrate impact, explaining how the data has been identified, collected and analysed in a culturally grounded way.

Action 7: All evaluation reports should be published Chapter 2	• We support this Action but note that it is important that the principles of transparency and accountability be applied across all policy and program areas, not just those affecting Aboriginal and Torres Strait Islander Peoples. • The concept for transparency is good but lacking in thought from an Indigenous perspective.	• A co-design process should make sure that Aboriginal and Torres Strait Islander people themselves decide whether reports should be published upfront. • Recognising that the scope of this strategy is limited to policy and program areas, not just those affecting Aboriginal and Torres Strait Islander Peoples, the Strategy should note that the principles of transparency and accountability should be uniformly applied.

Action 8: Agencies should publish an accessible evaluation report summary Chapter 1 & 2	• We support this action, however note that further detail is required to ensure that there is a clear understanding of what accessible means and for whom	• The need to tailor the form of the communication to the needs and priorities of the Communities being served should be explicitly recognised in the Strategy. • Rich media options should be considered for reporting and communities should not be limited to the option of just a short report.

Action 9: A central evaluation clearinghouse should be established Chapter 3	• We support this action and believe AIATSIS is appropriate	• The clearinghouse must always stay Indigenous. • In order to best position the OIPE to help drive organisational change, this function should be incorporated within the OIPE, or at least responsibility for the coordination of this activity should be vested with them, with appropriate funding being provided to support the delivery of the activity. • The OIPE should be funded to support the dissemination and exchange of learnings within and outside of government as part of its mandate to promote the adoption of culturally grounded evaluation and the application of it to support improved policy and program design.

Action 11: Agencies' performance against the Strategy should be monitored by the Office of Indigenous Policy Evaluation Chapter 3	• We endorse this Action, but do not believe it is sufficient for the OIPE to only have authority to monitor compliance with the Strategy	• The OIPE should have authority to compel compliance with the Strategy See comments relating to OIPE authority of OIPE in relation to Action 1 above.

Response to Action 12: The Strategy should be subject to independent review after five years Chapter 1	• We endorse this Action.	• The Review should comply with the Effectiveness Principles identified in relation to Action • The review should be led by an Indigenous-led team.

Response to the Indigenous Evaluation Strategy Issues Paper

Provided by Skye Trudgett and Lauren Siegmann from Clear Horizon

Clear Horizon

Clear Horizon is an independent consulting company that specialises in evaluation. The company was formally incorporated in 2005, and now has over 55 staff. Our staff work in the fields of environmental sustainability and climate change, international development, and social justice. In terms of our practice, our company is well known in the Australian community for participatory and collaborative approaches to the practice of design and evaluation.

We have over a decade's experience working with First Nations peoples to conduct evaluations. More recently, we have begun to strengthen our commitment to working alongside First Nations groups, recruiting First Nations peoples to design and implement evaluation.

This submission was drafted collaboratively by an Indigenous and non-Indigenous staff member. When drafting the submission, the authors considered what might be Clear Horizon's valued contribution to the strategy. We acknowledge that there is a wealth of cultural knowledge, of community knowledge, of academic knowledge, and of applied knowledge in the practice of evaluation with Indigenous communities. There is a growing body of knowledge regarding what constitutes best practice in evaluation which is generated by Indigenous peoples and Indigenous organisations. We were aware of Indigenous peoples and organisations who were submitting papers to the Productivity Commission. So, our goal with our submission was not to replicate the good work and knowledge of others but also to 'join the chorus' and contribute to a groundswell of voices that are calling for evaluations that best meet the needs of Indigenous peoples.

Having said that, there were some points we thought we could contribute to the Productivity Commission:

Section one: how evaluation has grappled with power in theory and practice. We would note that evaluation practice has historically been uniformly Western in its orientation. It's worth acknowledging that building Indigenous evaluation practices should ideally involve changes from multiple cultures, our fear is that the practice of evaluation in Indigenous contexts still relies on Indigenous peoples becoming 'bi-cultural', without a concomitant reciprocal change in orientation from their neighbouring cultures. Evaluators have been grappling with these issues both theoretically and practically for over 40 years, across a range of contexts. So, in section one, we discuss how evaluation has typically made sense of power and how it intertwines with the understanding and practice of evaluation.

Section two: our understanding of best principles. This is our 'joining the chorus section'. Here we acknowledge and affirm our understanding of and commitment to what is known about best practice in Indigenous evaluation contexts.

Section three: the liminal space between what gets written and what gets done. This is a more informal and reflective section where we reflect on our experiences of seeing organisations develop strategies and then struggle to reflect the spirit of the strategy. We included this section because our collective experience has shown us that organisations are typically better at articulating best practice in working with Indigenous peoples then they are at doing it. This is important to consider when developing a strategy, because the appropriate implementation of strategy is critical.

Section one: how evaluation grapples with power

Any theoretical, academic, or applied traditions and practices tend to be mediated by peoples who participate in overlapping and intersectional circles of power. People and groups hold power, and the powerholders of the day get to determine how theory is generated, how knowledge is constructed and the its implications for practice. The way that evaluation knowledge and practice is mediated is no exception.

- The practice of evaluation is shaped by who people think the evaluation should be accountable to, and people will have differing views about who the evaluation is accountable to. Usually 'people with power' get to determine who the evaluation is accountable to.

- The methods used to gather information about a program or project is informed by peoples or groups of people's personal views on what constitutes appropriate and adequate collection of information, and how reality is constructed. Again, people with power usually get to make these decisions.

- The judgement about the merit or worth of a program is usually mediated by people who hold power.

There is a rich theoretical and applied tradition in evaluation which seeks to understand the intersection between power and evaluation theory and practice.

- Evaluation theorists and practitioners have spent time debating the roles of values in evaluation. Whose values should be represented in evaluations? This is a particularly important debate when it comes to determining who the evaluation is accountable to, and who gets to judge the merit or worth of a program.

- Evaluation theorists and practitioners have historically engaged in (sometimes quite polarised!) debates about what constitutes the appropriate collection of information. More often than not, evaluation draws on social science traditions. Consequently, the debates about construction of reality follow fairly predictable patterns of positivist practitioners who think reality 'exists and is observable' at one end of the scale, and constructive practitioners who think 'reality is created by groups of people' of the scale.

When considering a strategy which seeks to engage Indigenous peoples in the practice of the discipline of evaluation, we would consider it advantageous for the peoples undertaking the development strategy to take some time to familiarise themselves with the history of evaluative theory and practice, especially as it pertains to the management of power in evaluation. It is also worthwhile to undertake a process of interrogating and criticising these evaluative traditions – because these evaluative traditions were written mostly by Westerners and their assumptions deserve to be scrutinised by groups of people who have not had opportunities to engage in theoretical traditions of evaluation.

It's time to get real here about how many communities and community practitioners view the practice of evaluation as it is usually implemented. The perception is not always great. (As evaluators we feel we are allowed to point this out!) These issues don't just affect the practice of evaluation in Indigenous communities but affect the broader practice of evaluation. The authors of this paper have collective decades experience in the conduct of evaluation. We see - more often than not - service workers, services users, and communities who are frustrated and alienated by the practice of evaluation. We surmise that many evaluation practitioners are feeling fairly certain about their epistemological and ontological orientations, and they don't leave a lot of room for flexibility. Many evaluator practitioners get bound up in the formal practices of evaluation, to the point that they don't see that it is frequently the case that service workers, users, and communities are natural evaluators. In our experience, when a program is working well, we see service workers and communities who are naturally scanning the environment, identifying what works, and then making amendments. They do this intuitively and informally, and if an evaluation practitioner is not able to recognise non-traditional practices of evaluation, then service workers and communities continue to be under-appreciated as evaluators. It leads to the development of evaluation reports that don't always reflect the realities of what actually has happened, because the service workers, communities, and evaluators, have different understanding of the nature of how reality is constructed and the expressed.

Section two: how Indigenous communities have responded to evaluation

Along with a range of Western practices, Indigenous peoples have been required to participate and engage with the practice of evaluation, which is Western in orientation and which draws on a tradition of theory and practice, often conducted by Western practitioners. Historical exclusion from the practice of evaluation has resulted in a community of Indigenous evaluation practitioners and stakeholders who have grappled with how to engage in the practice of evaluation and how to 'make it their own'. A review of contemporary discussions about conducting evaluation with Indigenous communities has revealed a range of principles and practices that are best practice.

Identified principles of conducting evaluation with Indigenous communities

- Recognising the diversity of Indigenous people. We live on a continent that has over 500 Indigenous nations. It is not a homogenous group. This has implications for the design and delivery of collaborative processes. Consulting with one community does not represent in and of itself a consultation will all Indigenous peoples, and this needs to be recognised and articulated. Identification of which language groups need to be consulted at which times needs to be thought through. This also includes a responsibility to do deep consultation with Indigenous peoples, not just consulting with groups who are the easiest to engage with.

- Recognising right to self-determination. This means that Indigenous peoples have the right to have full participation in matters that impact on their lives. It means that evaluation should be owned by and accessible to Indigenous peoples. It means that ultimately, evaluations are accountable to Indigenous peoples.

Identified best practices

- Being clear that evaluations need to reflect Indigenous values. Good evaluation practice needs to ensure that Indigenous communities are able to define the values informing the evaluative criteria and evaluative judgements. This is not a straight-forward process, because as mentioned earlier, there are no one set of 'Indigenous values' and these values differ within and between language groups.

- Collaborative and participatory processes that are ongoing through the life of the evaluation. Methods should be selected that prioritise and amplify the voice of the community. Collaborative and participatory processes need to be interrogated for appropriateness and effectiveness. Interrogation of these processes needs to happen

at every stage of the evaluation process. Collaborative and participatory process is not just about.

- Appropriate resourcing of evaluations. Doing cross-cultural evaluation that is collaborative and which sits across differing epistemological and ontological contexts takes time. In our experience, evaluations are often not sufficiently resourced so that best practice can be enacted. Development of resourcing models for evaluations with Indigenous people could contribute.

- Reciprocity and the keepers of cultural knowledge. Indigenous people usually carry the burden of crosscultural practice, by this we mean that it is usually the responsibility of Indigenous people to sit across two cultures. Non-Indigenous practitioners normally work alongside Indigenous peoples who have crosscultural knowledge. For true cross-cultural practice to occur, there needs to be reciprocity. This means that the non-Indigenous practitioners also need to be working across two-cultures.

- Indigenous data sovereignty is a global movement concerned with the right of Indigenous peoples to govern the creation, collection, ownership and application of their data. Indigenous peoples often don't get access to evaluation data that is collected about them. Communities who participate in evaluation have the right to view evaluation data and make their own evaluative judgements about the programs and projects that affect their lives. Indigenous data sovereignty recognises that evaluations are accountable to the Indigenous people they claim are benefiting from programs and projects. Data sharing agreements should be developed to store the evaluation data in some way with the participating communities.

- Improving tender processes. Documenting what culturally appropriate tendering processes looks like.

- Accountability mechanisms. Evaluators are usually accountable to the people paying for the evaluation. More often than not, this is a Government department or organisation who is also funding the program. The consequence of this is that the people implementing the evaluation see themselves accountable to the funder, the organisation is paying their wage or consulting fee. This often means that the expectations on the evaluator becomes intertwined with the political aspirations of the commissioner – and this may or may not align with the goals and priorities of the Indigenous communities who are affected.

- More creative approaches to reporting which are accessible and even enjoyable to read. Evaluation reporting subscribes to a range of culturally normative practices which favour people who are literate in academia and in Government. They are written in highly formalised language. Reports can be overly long. It is unfortunate that the concept of an evaluation report that is enjoyable to read seems almost a radical concept.

Section three: the liminal space between what gets written and what gets done

The Indigenous communities of Australia are not wanting for 'strategic direction'. Government departments abound with strategies for improving the ways in which they work with Indigenous peoples, and how we can collectively work to improve the lives of Indigenous peoples. How evaluations can be better designed to meet self-determination goals is already well documented. Indigenous people know what needs to be done.

We have worked in evaluation across a range of organisations, both Governmental and non-Governmental, and across a range of sectors. A common thread we have observed is the liminal space between what people write, what people say they want, and then what they do. Organisations who have well written and designed documents that articulate commitment to Indigenous people, to reconciliation, to self-determination, to respect for culture, still continue to fail Indigenous peoples. Why does this happen? Why do people say or write one thing and then do another?

We have worked in organisations who have very well written documents outlining their commitments to Indigenous peoples, and then we have observed the various ways in which the people in organisations have not been able to enact the very well written documents. We don't think it happens deliberately or consciously. It happens for a variety of reasons. Firstly, people working across cultures need a lot of emotional and social intelligence. In fact, we would argue that capacity for emotional and social intelligence is one of the most important enabling factors for working across Indigenous and non-Indigenous space. It is also worth exploring how power gets expressed in workplaces through day-to-day practices, and how these can interfere with the implementation of strategy. Frequently, power is expressed financially, so decisions get made based on financial needs – either directly or because organisations need to orientate themselves towards those who control financial access. This has a profound effect on day to day life of organisations and peoples, and of course impacts on implementation of strategies.

When writing a strategy, it is worth reflecting on the reasons why strategies, which get written with the best intentions, sometimes fail to fully implement, and exploring what the impact for Indigenous peoples is when strategies fail. By exploring and acknowledging this, the strategy can make some headway into providing protective and empowering spaces for the practice of evaluation with Indigenous peoples.

Conclusion

- Evaluation is a historically Western practice and most evaluation strategies are asking Indigenous people to engage in Western practices rather than thinking about how the epistemological and ontological constructions of reality could be better oriented to Indigenous ways.

- Evaluation theory has a long academic tradition of grappling with power and how this impacts on theconstruction and implementation of evaluation. It is worthwhile for the people developing the strategy to spend time engaging with these traditions as part of the development of the Indigenous evaluation strategy.

- We feel the core components for an Indigenous Evaluation Framework are:

    - Inclusive decolonising of traditional evaluation theory – being prepared to throw it out completely or having knowledge of the rules in order to strategically break them down and capture the process of this for future knowledge

    - Valuing traditional ways of knowing to share and shift power

    - Authorisation by Government to do things different, valuing non-conforming approaches and knowing they are best even when they might feel uncertain. Shifting power again.

    - Government need to stop asking (explicitly or implicitly) Indigenous people to describe themselves in a way that makes sense to Government and the Minsiter

    - Providing a space to enable the bravery of organisations to do things outside of the status quo, providing a space for support from Government to make the change

Finally, there is frequently a liminal space in Indigenous strategies between what people say the write, what the write they value, and then how they live in the world. This leads to strategies that never quite get implemented in the spirit they were intended. This can lead to stressful cross-cultural experiences. It is worthwhile considering this when developing the strategy.

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