



Submission to Productivity Commission Inquiry into an Indigenous Evaluation Strategy

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Dear Chairperson and Commissioners,

We make this submission with some ambivalence. Others have justifiably taken the view that engaging with an unjust and discriminatory bureaucratic system may serve to reinforce it. The problematic trends in the Indigenous policy sector — mainstreaming, paternalism, rapid-cycling policy change, defunding of the Indigenous community-controlled sector (ICCS) and hierarchical decision making — are connected to current performance management and evaluation practices. Evaluation can easily become a tool of administrative control over Indigenous peoples by replacing a meaningful two-way relationship with one-way scrutiny. Existing evaluation practices have disempowered ICCS organisations and reinforced the racialised narrative of Indigenous deficit that animates current policy.

However, it is also our view that the Productivity Commission's ('the Commission') work offers an opportunity to refocus discussion on core issues of power and legitimacy that explain the sustained lack of progress in Indigenous wellbeing. A good evaluation strategy has the potential to disrupt problematic, chaotic and discriminatory Indigenous policymaking in Australia.

Our submission identifies that Australian Indigenous policy evaluation has, until now:

- been inconsistent, racist and arbitrary, while being used rhetorically to authorise poorly-planned policy interventions without Indigenous input (for example, it has targeted ICCS organisations — the most functional part of the policy system — rather than large mainstream charity organisations or government agencies),
- assumed that central government agencies, such as Prime Minister and Cabinet (PM&C), are the appropriate *evaluators* (holders of knowledge, authority and decision-making power) while frontline ICCS organisations and communities are the *evaluatees* (the site of likely dysfunction and risk), and
- focused on service delivery in a technical way, without providing mechanisms for evaluation data to inform problem definition and program design.

Yet community-driven, principles-led evaluation has the potential to transform each of these dynamics, by doing the following:

- **Strengthening rather than undermining the crucial Indigenous community-controlled sector (ICCS)**, which has developed as a response to sustained mainstream policy failure. Evaluation that is transparent and supports self-determination will challenge the racialised assumption that ICCS organisations/people are deficient, and that mainstream organisations/people are competent.
- **Recognising the ICCS as the site of knowledge, legitimacy and decision-making capacity**, that is, **as the primary evaluators**, while identifying the site of risk in policy as disconnected,



centralised government and NGO bureaucracies, which currently escape scrutiny. This locates **government and corporate service-delivery agencies as the primary *evaluatees***.

- Providing a mechanism that allows the ICCS to draw on its connection to community to engage in real-time and deep evaluation of policies and programs, and share that knowledge with government to inform **policy design** and **problem definition**.

To achieve this transformative strategy, we identify a three-step process.

Firstly, we identify core evaluation concepts grounded in Rigney's Indigenist research framework:

- anti-racism (resistance as the emancipatory imperative), and
- self-determination (political integrity and privileging Indigenous voices).

Secondly, these lead us to propose that:

- the ICCS be supported to come together to develop evaluation principles, and
- this group leads development of a concrete evaluation strategy, which identifies evaluation purposes and approaches based on the goals of the communities that they represent.

Finally, we propose that the Commission work with this group to develop a final workable Indigenous evaluation strategy to be submitted to government.

In making this submission, we draw from:

- our collective experiences as Indigenous and non-Indigenous scholars who are familiar with Indigenous policy and evaluation,
- the experiences of ICCS organisations, which we have led, been part of, and engaged with over many years, and
- the broader Indigenous and non-Indigenous scholarship on this topic.

This submission contains three main sections in which we:

- reflect on the context within which calls for this evaluation strategy have arisen, including the experiences of ICCS organisations within the broader bureaucratic infrastructure of the state,
- discuss the opportunities offered by a principles-based approach to evaluation, and
- propose next steps in developing an evaluation strategy that centres Indigenous expertise and empowers ICCS organisations and peoples.

While we have not provided direct responses to the list of 48 specific questions posed in the Commission's Issues Paper, we have used these questions to guide the content of our submission.

We hope the information we set out here assists the Commission's progress towards developing an evaluation strategy that goes beyond mere rhetoric or additional layers of bureaucracy and administration to one that is truly transformative. We would also be happy to provide further advice to the Commission upon request.

1. The Commission has been set a challenge to create a transformative strategy: to make things better (not worse), self-determination must be the starting point

The Commission's Issues Paper outlines its commitment to a self-determination approach in Indigenous¹ policy² and evaluation. The Issues Paper and letter of direction suggest that the goal is to generate better outcomes for Aboriginal and Torres Strait Islander peoples, facilitated through the use of meaningful evaluations of the agencies with responsibility for policies and programs affecting Indigenous Australians.

In general terms, we agree that evaluation is important for guiding evidence-informed programming to alleviate social disadvantage. It is our experience that Indigenous community-controlled sector (ICCS) organisations (herein referred to as 'ICCS organisations'³) and peoples *want* evidence that the policies and programs they are delivering, or participating in, are effecting positive change. They also want to see government and mainstream agencies face the same level of scrutiny, reporting and evaluation, and be held to the same high standards. However, it is *not* the case that outcomes for Aboriginal and Torres Strait Islander peoples will simply improve upon the realisation of 'more' or 'better' evaluation, because it is not a mere lack of evaluation that is causing poor outcomes. **The core problems are instead the failure of the Australian Government to recognise Indigenous Australians' self-determination and sovereignty, and the racially-based assumption of Indigenous deficit that structures policy programs and enables the ongoing marginalisation of ICCS organisations.**

If the Commission is serious about effecting transformative changes that can lead to improved wellbeing for Indigenous Australians, and seeing evidence-based policy as more than "just an empty phrase",⁴ then "...integrating notions of power and control and putting them back at the centre of the debate about Aboriginal health and wellbeing is the critical challenge..."⁵

¹ We use the term 'Indigenous' in this submission to refer to both Aboriginal and Torres Strait Islander peoples as the First Nations peoples and sovereign inhabitants of the land that is now Australia.

² Although we use the term 'Indigenous policy' in this submission, we note that this term is typically used to refer to policies that merely *apply* to Indigenous peoples, but that are typically conceived of and constructed by non-Indigenous peoples.

³ The label 'community-controlled' is used here to describe: i) ICCS organisations that operate within, are staffed and controlled by small (typically geographically-defined) communities of Indigenous peoples; ii) organisations that operate as 'peak bodies' to other smaller ICCS organisations; and/or iii) organisations that operate across multiple communities, but with varying levels of community ownership and control. Thus, while we use the term 'ICCS organisations' to refer to all of these organisation types here, we also note that it will be important for the Commission to clearly distinguish what is truly meant by 'community' and 'control', in its deliberations around evaluation. We also note that our reference to ICCS organisations in this submission *does not* include Indigenous 'services', which are typically central services (e.g. municipal, primary health, justice) delivered by non-Indigenous bodies to Indigenous peoples.

⁴ Anderson, P. 2011. *Keynote address: research for a better future*. In. Coalition for Research to Improve Aboriginal Health, 3rd Aboriginal Health Research Conference, 5-6 May, Sydney, p.20.

⁵ Anderson, P. 2014. *Eberhard Wenzel Oration: Empowerment and Closing the Gap*, In. 22nd National Australian Health Promotion Association Conference & 18th Chronic Diseases Network Conference, 5 September, Alice Springs, p.3.



Unless the Commission’s work triggers a shift in power arrangements at the core of Indigenous policy and programming, simply more “evaluation fetishism” will do nothing to improve health and wellbeing of Indigenous Australians.⁶

Similarly, claims about ‘consulting’, ‘co-design’ and ‘engagement’ of Indigenous Australians will continue to be mere rhetoric: euphemisms for tokenistic ‘listening’ but not ‘hearing’.⁷

An important element of developing an evaluation strategy will, thus, be to properly understand the ways in which it might empower and/or disempower ICCS organisations and Indigenous peoples, including in the context of a service-delivery model that consistently privileges non-Indigenous, mainstream providers. In the following sections, we briefly set out some initial concerns related to that broader context.

Ultimately, evaluation alone cannot change things, but the Commission’s inquiry can make recommendations of principles and processes that have the potential to enact change at the policy and program level, with new evaluation-type processes to extend and reinforce a principles-based system that supports self-determination.

1.1. An evaluation strategy must empower (not disempower) Indigenous peoples and ICCS organisations

ICCS organisations have long stepped in to fill service-delivery gaps left by others. This means consistently stepping above and beyond the work they are contracted and funded to do. Often it also means working in the shadows of large non-Indigenous monopoly organisations, which have the economies of scale necessary to aggressively tender for and steal Indigenous funding away from smaller, community-based Indigenous providers. It is a frustrating irony that, while Indigenous deficit is used as the moral imperative for program investment, ICCS organisations generally receive a very small fraction of available funding. Occasionally, large non-Indigenous monopolies throw scraps of funding to ICCS organisations through sub-contracts to (typically) deliver ‘cultural’ components of service delivery, or use ICCS organisations to ‘accessorise’ applications for funding that non-ICCS organisations would be unable to secure alone.⁸ However, this system further disempowers ICCS organisations, severely compromises the services being delivered, and stalls outcomes.

So-called ‘cultural competency’ cannot be parcelled off to ICCS organisations; it must form a central thread that runs through *all* service delivery to Indigenous peoples (i.e. from conception of policy/programs to implementation/delivery and beyond). Workshops and briefings cannot teach

⁶ Altman, J., & Russell, S. 2012. Too much ‘Dreaming’: Evaluations of the Northern Territory National Emergency Response Intervention 2007–2012. *Evidence Base*, 2012(3), 1–24.

⁷ Davis, M. 2016. Listening but not hearing: when process trumps substance. *Griffith Review*, 51: 73–87.

⁸ Bond, C. and Brady, K. 2013. Locating Indigenous Australia within community development practice: clients, consumers or change makers? *New Community Quarterly Journal for Social Justice, Sustainability, Community Development and Human Rights*, 43(3): 33–39.



non-Indigenous organisations and staff to be ‘culturally competent’. To suggest so severely diminishes the complexity and richness of Indigenous cultures.

Demands on organisations for regular monitoring data and evidence of evaluated outcomes also favours large non-Indigenous monopolies. This relates to and raises serious questions about how ‘accountability’ is defined and enacted in what is referred to as ‘Indigenous Affairs’. Accountability procedures are seen as a necessary mechanism in contemporary public governance. However, a great deal of what is done and considered as accountability processes by government is poorly-designed and does not serve the needs of government or of ICCS organisations.

‘Accountability’ has become a lopsided concept, whereby the focus is overwhelmingly on service providers being accountable to government, and where there is no concomitant focus on the accountability of government to the most important stakeholders: Aboriginal and Torres Strait Islander peoples. While accountability in society at large is continual, contextual and reciprocal, in the Australian Public Service it is typically uni-linear and limited to formal reports⁹ that equate accountability with ‘accounting’ (i.e. “the exchange of money for information and compliance”¹⁰).¹¹ This reductive rendering leads to the operationalisation of accountability as mere paperwork: monitoring and reporting processes that provide authorities with a sense of control over action and feed their desire for information. But there is an inevitable trade-off between these ‘accountability’ processes and on-the-ground effectiveness.

While non-Indigenous organisations might be adept at collecting monitoring data and submitting performance reports (and/or have the resources to engage an army of typically non-Indigenous consultants to do this for them), this does not mean their reports of ‘outcomes’ under these frameworks relate to any positive effects ‘on the ground’. How is it, otherwise, that so much busyness takes place in these non-Indigenous organisations, and so much funding goes there, but so-called ‘gaps’ in Indigenous wellbeing remain or continue to grow?

In contrast, ICCS organisations that have deep and lasting links to their communities truly understand if their work is effecting positive change, and if not, how to adapt so that it does. They are held accountable — and hold themselves accountable — to their communities. Even where ICCS organisations *do* evaluate and report outcomes that align with top-down funding contracts, this rarely (if ever) has the effect of triggering any change in resourcing and power arrangements that systemically privilege non-ICCS organisations.

⁹ Sullivan, P. 2008. Bureaucratic process as morris dance: An ethnographic approach to the culture of bureaucracy in Australian Aboriginal affairs administration. *Critical Perspectives on International Business*, 4(2/3), 127–141.

¹⁰ Dwyer, J., Boulton, A., Lavoie, J., Tenbenschel, T. and Cumming, J. 2014. Indigenous peoples’ health care: new approaches to contracting and accountability in the public administration frontier. *Public Management Review*, 16(8): 1091–1112, p.1106.

¹¹ This renewed focus on accountability for financial management was driven by the *Public Governance Performance and Accountability Act (2013)*. However, while the accountability regime informed by this Act has become narrow in practice, the intent of the reforms went further, emphasising that the performance of the public sector should be measured against benefits to the public, including through reduced red tape for community organisations, rather than just financial record-keeping.



There is often, then:

- a disjuncture between what ICCS organisations *know* works, and what they need to report against to fulfil government funding requirements,
- a great deal of unnecessary and unhelpful administrative ‘busyness’ that has to go on, which distracts ICCS organisations from the *real* work of providing meaningful services to their communities, and
- a sense of futility in continually having to ‘jump through hoops’ when it rarely results in greater recognition of Indigenous expertise or support for ICCS organisations.

In this context, top-down bureaucratic reporting frameworks, which construe ‘outcomes’ as a means of mere program accountancy, simply add an extra burden. They also represent a form of epistemic violence, since within these frameworks ICCS organisations and peoples cannot be understood on their own terms, from their own perspectives, and do not have authority over interpretations of their cultures, identities, or experiences.¹² Institutions and organisations seeking to create change in response to past and ongoing injustices have an ethical responsibility to address these historic and ongoing epistemic injustices.¹³

Despite these layers of bureaucracy that serve the interests of non-Indigenous bureaucrats and service providers, it is ICCS organisations that are placed under unfair scrutiny and blamed for poor progress. The scrutiny that ICCS organisations endure is overwhelming when compared with non-Indigenous organisations.¹⁴ This has been coupled with the layered effects of racialised political attacks on Indigenous policy and program infrastructure. From the politically-motivated disbanding of the Aboriginal and Torres Strait Islander Commission in 2005, to the more recent racially-motivated requirements of the Indigenous Advancement Strategy (IAS),¹⁵ governmental technologies of power and control have repeatedly served to weaken ICCS organisations while non-Indigenous providers have thrived and prospered on funds earmarked to ostensibly serve the needs of Indigenous communities.¹⁶

¹² Moreton-Robinson, A. 2011. The white man’s burden: patriarchal white epistemic violence and Aboriginal women’s knowledges within the academy. *Australian Feminist Studies*, 26(70): 413–431; Fricker, M. 2007. *Epistemic injustice: power and the ethics of knowing*, Oxford University Press

¹³ Anderson, E. 2012. Epistemic Justice as a Virtue of Social Institutions. *Social Epistemology*, 26(2), 163–173.

¹⁴ And, more broadly, Indigenous peoples and organisations also endure far more scrutiny than the state has ever received for its historical and ongoing violent policies against Indigenous Australians in the name of ‘progress’. (For example, see: Lea, T. 2012. When looking for anarchy, look to the state: fantasies of regulation in forcing disorder within the Australian Indigenous estate. *Critique of Anthropology*, 33(2): 109–124.)

¹⁵ For instance, under the IAS, ICCS organisations receiving grants in excess of \$500k were required to incorporate under the *Corporations (Aboriginal and Torres Strait Islander) Act 2006* (Cth), causing then Aboriginal and Torres Strait Islander Commissioner, Mick Gooda, to note that the requirement raised “immediate alarm bells” and may breach multiple sections of the *Racial Discrimination Act 1975* (Cth). (See: Gooda, M. 2015. *Social Justice and Native Title Report*. Australian Human Rights Commission: Sydney, p. 22.)

¹⁶ There are many examples of large amounts of funding going to non-Indigenous bodies to ostensibly serve the interests of Indigenous Australians, but where there appears to be little or no demonstrated evidence of effectiveness. For example, see: Scullion, N. 2019. *\$8 million to Brisbane Broncos to support Indigenous students succeed at school*. PM&C: Canberra; Allam, L. 2018. Minister offered \$460,000 Indigenous funding to groups that did not ask for it. *The Guardian*, November 15.



We know that ICCS organisations have the relationships, knowledge, experience and insight needed to deliver services in ways that *do* connect with and reflect meaningful change in peoples’ lives. This has been documented in multiple studies and inquiries,¹⁷ is widely recognised as a core principle of community-development practice, and is also common knowledge amongst Indigenous communities. However, they continue to be undermined. This includes through the nature of New Public Management contracting itself, whereby governments can claim to be benevolent by contracting ICCS organisations to deliver services, but at the same time tying these organisations’ hands behind their backs through strict contract clauses that cover everything “...from operating guidelines, to numbers and qualifications of staff and height of the toilet bowls...”¹⁸ In this sense, claims concerning ‘community management’ can represent mere tokenism and cloak the reality of power relations, whereby ICCS organisations that ‘step out of line’ simply have their contracts discontinued. The practical effect can be that ICCS organisations are merely co-opted to disguise government agendas.¹⁹

There are many reasons to reform program management to make use of Indigenous excellence and local knowledge. These should not be seen as radical changes, but a recognition that centralised resourcing and principle-agent program management is not a suitable method for all policy areas. In other jurisdictions, governments have recognised the need to change their practices to enable local-level effectiveness — moving from ‘economies of scale’ to decentralised ‘economies of scope’.²⁰ These kinds of new arrangements involve distributed policy development and holistic approaches to programming and funding. Locally-connected organisations are a source of expertise for program planning, and program management is adaptive, learning from action and attention to local circumstances, providing programs and services that are responsive and accountable to the local community.

There is a need to recognise, within any evaluation strategy, that self-determination, growth and stability of ICCS organisations is a key primary measure of success. If this core outcome is achieved, then it will inevitably flow to improved outcomes across broader aspects of health and wellbeing.

1.2. Policymaking is not only evidence-based

In its Issues Paper, the Commission states: “Better and more systematic policy evaluation would lead to better policy planning, design, implementation and greater avoidance of duplication. It would

¹⁷ Howard-Wagner, D. 2018. Moving from transactional government to enablement in Indigenous service delivery: the era of New Public Management, service innovation and urban Aboriginal community development. *Australian Journal of Social Issues*, 53(3): 262-282; Stewart, J., Lohar, S. and Higgins, D. 2011. Effective practices for service delivery coordination in Indigenous communities. Closing the Gap Clearinghouse, Resource sheet no. 8. Australian Government: Canberra; Howard-Wagner, D. 2017. Successful urban Aboriginal-driven community development: a place-based study of Newcastle. Centre for Aboriginal Economic Policy Research (CAEPR), The Australian National University: Canberra; Bond, C. and Brady, K. 2013. Op cit.

¹⁸ Bryson, L. and Mowbray, M. 1981. Community: the spray-on solution. *Australian Journal of Social Issues*, 16(4): 255-267, p. 262.

¹⁹ Soss, J., Fording, C., and Schram, S. 2011. *Disciplining the poor: neoliberal paternalism and the persistent power of race*. University of Chicago Press: Chicago.

²⁰ Marsh, I., Crowley, K., Grube, D., & Eccleston, R. 2017. Delivering Public Services: Locality, Learning and Reciprocity in Place Based Practice. *Australian Journal of Public Administration*, 76(4), 443–456.



provide the basis for successful policies and programs to be expanded, and less successful programs curtailed.”²¹ However, evidence-based policymaking is a misnomer; policy is rarely if ever based on evidence alone. Even when policy is evidence-*informed*, it remains deeply politicised and racialised.²² As Pat Anderson noted with regard to the Northern Territory Emergency Response:

...all sorts of other factors seem to take their place ahead of the evidence when it comes to making the ‘big’ decisions on Aboriginal health and wellbeing. These other factors may include calculations about narrow political advantage, unexamined prejudices and assumptions, even sheer personal ego.²³

There are countless examples of the Australian Government constructing Indigenous-focused policies in the absence of evidence when it suits other agendas, as well as failing to implement evidence-based recommendations from numerous inquiries.²⁴ For example, this distinct *absence of evidence* in policymaking can be observed in the Australian Government’s ongoing (lack of) response to calls for Treaty, which contradicts the strong and continually expanding evidence base, both in Australia and internationally, showing that racism and disempowerment have significant ongoing negative effects for the health and wellbeing of Indigenous populations.²⁵ (The Commission also alludes to this evidence in its Issues Paper.²⁶) In fact, it is an exasperating irony that as this body of evidence has grown, the rights and power of Indigenous Australians have continued to be actively stripped away.²⁷ **It is deeply hypocritical for the Government to recognise the paramount importance of evidence in some areas of Indigenous policy, whilst simultaneously ignoring evidence in other areas.**

This reality is one of many indications that race is ever-present in Australian policymaking and informs approaches that perpetuate unjust and unequal power relations. An evaluation strategy that does not identify and grapple with this fact will only serve to reinforce the status quo. The evaluation strategy must therefore be very clear about the purpose of evaluation and any claims about the importance of evidence for policy and program management should be demonstrated through changes in government practices. The strategy should, for example, change the balance of resourcing

²¹ Productivity Commission. 2019. *Indigenous evaluation strategy: Issues paper*. Productivity Commission: Canberra, p.7.

²² Anderson, P. 2011. *Ibid*; Anderson, P. 2014. *Ibid*; Cairney, P. 2016. *The politics of evidence-based policy making*. Palgrave Macmillan: London; Colebatch, H. (Ed.) 2006. *Beyond the policy cycle: the policy process in Australia*. Allen & Unwin: Crows Nest.

²³ Anderson, P. 2011. *Ibid*, p.21.

²⁴ For example, recommendations from the Royal Commission into Aboriginal Deaths in Custody (1991), the National Inquiry into the Separation of Aboriginal and Torres Strait Islander Children from their families (and subsequent *Bringing them Home Report*, 1997), and the Northern Territory Board of Inquiry into the Protection of Aboriginal Children from Sexual Abuse (and subsequent Ampe Akelyernemane Meke Mekarle, ‘Little Children are Sacred’ Report, 2007), to name a few. Notably, the headline recommendation in the Little Children are Sacred Report was that government should work in cooperation with Indigenous peoples – a recommendation that was wholeheartedly dismissed in the then Coalition Government’s subsequent Northern Territory Emergency Response.

²⁵ Griffiths, K., Coleman, C., Lee, V. and Madden, R. 2016. How colonisation determines social justice and Indigenous health - a review of the literature. *Journal of Population Research*, 33(1): 9-30; Paradies, Y. 2016. Colonisation, racism and indigenous health. *Journal of Population Research*, 33(1): 83-96.

²⁶ Productivity Commission. 2019. *Ibid*, p.7.

²⁷ Davis, M. 2016. *Ibid*.



and administrative burden across Indigenous and non-Indigenous organisations. If it falls short of this, the strategy will be seen as an act of evaluation fetishism,²⁸ a ritual for the comfort of government at the cost of the wellbeing of Indigenous people.

1.3. The nature of evidence is highly contested

The accumulation of knowledge and evidence itself is not a neutral process. The kinds of methods used, the ontological positioning of the researcher/s (and more) have the effect of structuring what comes to be regarded as 'truth'.²⁹ What is claimed to be 'known' about Indigenous Australia and Indigenous Australians has been overwhelmingly derived from research *about*, but not *by* or *with* Indigenous Australians. This research has been largely undertaken from a deficit standpoint, which frames Indigenous Australians as inferior and in need of 'fixing' and 'moulding' (usually by white hands).³⁰

An evaluation strategy needs to deeply engage with core questions about who has the authority to 'know' and whose evidence is taken seriously in the kinds of evaluation work it proposes. A strategy that does not concomitantly seek to confront these issues runs the very real risk of becoming yet another bureaucratic weapon of colonial administration — another "...institutionally thickened process... that must be obeyed"³¹ — but which further undermines (rather than empowers) Indigenous peoples.

²⁸ Altman, J., & Russell, S. 2012. Too much 'Dreaming': Evaluations of the Northern Territory National Emergency Response Intervention 2007–2012. *Evidence Base*, 2012(3).

²⁹ Moreton-Robinson, A. 2015. *The white possessive: property, power, and Indigenous sovereignty*. University of Minnesota Press: Minnesota; Marston, G. and Watts, R. 2003. Tampering with the evidence: a critical appraisal of evidence-based policymaking. *The Drawing Board: an Australian Review of Public Affairs*, 3(3): 143-163.

³⁰ Moreton-Robinson, A. 2009. Imagining the good Indigenous citizen: race war and the pathology of patriarchal white sovereignty. *Cultural Studies Review*, 15(2): 61-79.

³¹ Lea, T. 2012. *Ibid.*, p.118.

2. Principles for policy, programming & evaluation

The letter of direction to the Commission recommended that its evaluation strategy be centred on a principles-based framework. A principles-based framework has the potential to be elastic enough to suit dynamic and complex environments. However, defining principles in a form that allows for meaningful evaluation is not a straightforward task, and **it cannot be done through this submission process alone**. Referring to something as a principle does not make it a principle, or a useful basis for evaluation.³²

Equally important to defining principles is achieving clarity around the language used to negotiate and describe an evaluation strategy. Thus, in the below sections we set out to:

- firstly, clarify our understanding of some key terms used in the Commission’s Issues Paper, and
- secondly, propose one potential avenue, which may provide a foundation for further developing a principles-based approach.

Ultimately, as we set out in section 3 of this submission, development of principles must be led by Indigenous peoples and ICCS organisations.

2.1. Defining key terms used in the Issues Paper

- **Evaluation:** Evaluation seeks to understand the merit, worth or significance of policies and programs. To be effective, the new evaluation strategy must focus on the design, delivery, outcomes and impacts (that is, the intended and unintended short- and long-term consequences of policies and programs, as defined by Aboriginal and Torres Strait Islander peoples) at the level of the whole program cycle and its components — from policy conception to delivery, contracting, compliance/reporting processes, management decisions, and more. This goes beyond the typical use of the term by government agencies, which reduces evaluation to mere performance management.
- **‘Meaningful evaluation/s’ and ‘accountability’:** As stated in the letter of direction, improving outcomes from government policy and programs depends on “undertaking meaningful evaluations.” We understand meaningful evaluation to be evaluation that helps government to understand how it can support Indigenous peoples to take the lead in developing and delivering effective policy and programs. For instance, meaningful evaluation would, thereby enable the government to be held accountable to Indigenous peoples for the level of self-determination it enables. This goes beyond government conceptions of accountability as top-down reporting. For instance, a meaningful evaluation would examine the extent to which ICCS organisations are resourced and given the space to be the ones delivering services to Indigenous peoples.

³² Patton, M. Q. 2018. Principles-Focused Evaluation: The GUIDE. NY: The Guilford Press.



inala wangarra
Making the Invisible Visible in Culture, Spirit and Identity

- **Evaluation principles:** Well-defined principles guide decisions and actions, and can be used to evaluate programs and organisations operating under these principles. Developing principles that can be used for effective program management requires a reflective process with stakeholders, to negotiate principles worded in a way that can guide programs and evaluation. Referring to something as a principle doesn't make it a principle or a useful guide for policy, programs or evaluation.³³

The power of principles for policy development, program delivery and evaluation is that they are adaptable to different contexts. While predefined structures and contracted outcomes appear tractable to high-level management, they are not meaningful or effective at the local level.³⁴ Principles allow both the local-level experts and high-level abstract managers to have a shared understanding of how 'good' can be judged. Thus, principles can be framed in a way that can guide decisions, operations and evaluation across all levels, including: i) policy development, program design, and program management; ii) program operations (from contracting and funding, to delivery and reporting); and iii) evaluation design and practice — including how to recognise when the agreed principles are being followed, and how to effect two-way reporting on alignment with principles.

2.2. A potential starting point for building foundational principles

Indigenous researchers have been at the forefront of developing an Indigenist research paradigm, which draws on a relational ontology, understanding the world as interconnected and knowledge as emerging from experience in the world.³⁵ Evaluation is a form of knowledge production — like other kinds of research, it is based on cultural and political assumptions and so can either reinforce or challenge colonial hierarchies. Therefore, we suggest that these well-established Indigenist research principles provide an appropriate starting point for an Indigenous evaluation strategy. Foundational principles for policy, programs and evaluation must reflect Indigenous "...ways of knowing, being, and doing".³⁶

³³ Patton, M. Q. 2018. *Principles-Focused Evaluation: The GUIDE*. NY: The Guilford Press.

³⁴ This was effectively demonstrated in the original documentation for the Indigenous Advancement Strategy, which set out detailed 'outcomes' defined by PM&C. Most of these 'outcomes' made little or no sense at the local community level, reflected siloed thinking common to bureaucracy (but which contradicts real-world complexities), and merely served to confuse and confound.

³⁵ For example, the work of scholars such as Dr Martin Nakata, Dr Lester-Irabinna Rigney, Dr Roianne West and Dr Karen Martin has been critical in this regard.

³⁶ Rigney, L.-I. 1999. Internationalization of an Indigenous Anticolonial Cultural Critique of Research Methodologies: A Guide to Indigenist Research Methodology and Its Principles. *Wicazo Sa Review: Emergent Ideas in Native American Studies*, 14(2), 109–121; Martin, K., (Mirraboopa, B.) 2003. Ways of knowing, being and doing: A theoretical framework and methods for indigenous and indigenist research. *Journal of Australian Studies*, 27(76), 203–214; West, R., Stewart, L., Foster, K., & Usher, K. (2012). Through a critical lens: Indigenist research and the Dadirri method. *Qualitative Health Research*, 22(11), 1582–1590.

Table 1 Guiding Indigenist research concepts and examples of how these might operate in an evaluation context

Guiding Indigenist research concepts (drawing on Rigney ³⁷ and others)	Examples of how concepts might operate in an evaluation context
<p>Anti-racism³⁸: This is a <i>freedom to resist that which is harmful</i>. It means acknowledging the history and harms of colonisation, recognising the context of racism, and the way ‘race’ has been used to create a social hierarchy with Indigenous people at the bottom. It means paying attention to the social, historical and political contexts which shape the experiences, lives, positions and futures of Indigenous people and celebrates the ongoing survival of Indigenous peoples.</p>	<ol style="list-style-type: none"> Resist racism: Freedom to resist that which is harmful, including racism in all forms. Pay attention to context: Understand and pay attention to how race and historical as well as current social and political contexts, continue to shape the experiences, lives, positions and futures of Indigenous peoples. Celebrate survival and strength: Take measures that celebrate and support the survival and flourishing of Indigenous cultures, ways of living and being.
<p>Self-determination³⁹: This is about rejecting the monopoly that non-Indigenous peoples have had over knowledges produced <i>about</i> Indigenous peoples. Integrity is supported by building research on the relational ontological and epistemological perspectives of Indigenous peoples, with methodology that honours Indigenous social and ethical processes.⁴⁰ This concept seeks to redress issues of power; it upholds the sovereignty of Indigenous peoples and is an orientation to the focus on Indigenous peoples as the ones asking the research questions and setting the research agendas that trigger knowledge- and information-gathering. This also means “focusing on the lived, historical experiences, ideas, traditions, dreams, interests, aspirations, and struggles of Indigenous people”,⁴¹ and entails advocating for research methodology that privileges Aboriginal and Torres Strait Islander voices and lands.⁴²</p>	<ol style="list-style-type: none"> Accountability to Indigenous peoples: Accountability is primarily to Indigenous communities who are affected by policy and programming. Representation: Success, and the means by which it is measured, is defined by Indigenous peoples. The subjective accounts of Indigenous peoples are valued, trusted and accepted as a legitimate form of evidence. Reporting and evaluation practices allow Indigenous peoples to be represented on their own terms, and prioritise Indigenous voices. Place: Recognise the role of ‘place’ (e.g. community context) in providing barriers and opportunities, which requires deep local knowledge to understand and navigate. Power and autonomy: Recognise that Indigenous peoples and ICCS organisations are the source of local knowledge and guidance for design and evaluation of policies and programs, and determine the conditions for programs being delivered or evaluation work being done. ICCS

³⁷ Rigney, L.-I. 1999. Ibid.

³⁸ Rigney, L.-I. 1999. Ibid. This draws on Rigney’s principle regarding “resistance as the emancipatory imperative”.

³⁹ Rigney, L.-I. 1999. Ibid. This draws on Rigney’s principles regarding “political integrity” and “privileging Indigenous voices”.

⁴⁰ The Dadirri research approach (from the Ngangikurungkurr people of Daly River) enacts this principle, based in the practice of Dadirri as a way of paying attention, with deep listening, observation, and contemplation. (West, R., Stewart, L., Foster, K., & Usher, K. 2012. Ibid; Laycock, A., with Walker, D., Harrison, N., & Brands, J. 2011. Researching Indigenous health: a practical guide for researchers. The Lowitja Institute.)

⁴¹ Rigney, L.-I. 1999. Ibid, p 117

⁴² Rigney, L.-I. 1999. Ibid.



inala wangarra
Making the Visible in Culture, Spirit and Identity

Guiding Indigenist research concepts (drawing on Rigney ³⁷ and others)	Examples of how concepts might operate in an evaluation context
	<p>organisations and communities may not give consent to delivery of programs, or collection of data for evaluation, that is not consistent with community needs and representations.</p> <ol style="list-style-type: none"> 8. Community connectedness: Enable ICCS organisations, which have deep and sustained local connections in the community/communities in which they operate, the flexibility needed to provide services/activities that meet their understandings of local 'need' (e.g. addressing gaps in service, and devising/delivering services that can effect positive change in peoples' lives). Connectedness provides real-time understanding of issues, needs and successes, without requiring surveys or evaluation consultants. 9. Stable, sustainable and self-determining: Enable ICCS organisations to be stable, sustainable and self-determining, through contractual and funding arrangements that recognise and strengthen, rather than restrict and undermine, autonomy and self-determination. 10. Community expertise: Value and draw on community expertise through formal and informal means. 11. Relational ways of being and working: Embody Indigenous perspectives through relational ways of being — appropriate forms of networks, connection to country, culture, place, and community. 12. Freedom to respond: Provide flexibility for ICCS organisations to adapt services/activities ("innovate") and use their local expertise to guide their services and activities towards locally-agreed positive principles (rather than 'outcomes').

The examples outlined in Table 1 are expressed at an abstract level, and point towards the need for a process that would bring together ICCS organisations to self-determine their own set of principles, and lead the development of an evaluation strategy. The following section outlines some next steps in achieving this.

3. Next steps for the Commission in this inquiry and beyond

The Commission's process must begin as it means to go on. If it is committed to self-determination, then it must first initiate and support a process that brings together ICCS organisations to develop the strategy. It cannot assume bureaucratic expertise and unilaterally decide upon a strategy to be pushed onto the ICCS and communities. And it cannot propose an evaluation strategy that has at its core an emancipatory agenda, and yet be concerned with account keeping instead of real social change.

If it is to do more than pay lip service to 'Indigenous engagement', this process must be led by the Indigenous experts who have been trying to be heard by governments. We know that ICCS organisations and communities want better outcomes for Indigenous peoples, know how to make good policy, and know how to assess if it is working. **An ICCS-led process would produce an effective, as well as a transformative, evaluation strategy.**

3.1. Convene a gathering of ICCS organisations

This inquiry and submission process is insufficient in terms of providing a basis for developing a sector-wide evaluation strategy that is truly reflective of the needs of ICCS organisations and peoples. The limited number of submissions received by the Commission to date, which only include a handful from ICCS organisations, is evidence of this. However, an evaluation strategy that does not reflect the needs and aspirations of ICCS organisations and Indigenous peoples runs the real risk of being further disempowering.

To that end, we suggest that the Commission convene a gathering of a broad range of ICCS organisations (widely defined as also including, for instance, neighbourhood centres, legal centres, arts organisations, health centres, land councils etc.), with a broad spread of experience in delivering community programs, from across Australia, in order to (at least):

- discuss how a sector-wide evaluation strategy could be truly empowering for Indigenous governance in this space,
- negotiate principles for practice and how these should be applied, at different levels, and across the policy cycle,
- discuss how funding practices for programming and evaluation can be reimagined so that they support (rather than undermine) the self-determination of ICCS organisations (e.g. without permission to use grants for basic operational costs, and reliable term contracts, ICCS organisations cannot become stable and sustaining), and
- discuss strategies for supporting the development of Indigenous evaluation expertise, drawing on Indigenous ontology.

To enable this, funding would be required from the Commission, including to support secretariat-type activities that would enable this process to work well.

3.2. Develop an evaluation strategy (and advocate for fair funding mechanisms) based on this negotiation with ICCS organisations

Negotiations with ICCS organisations would enable the Commission to do the following:

- Develop an evaluation strategy that is appropriate for ensuring ICCS organisations and peoples can act with self-determination, and which applies across the entire policy cycle to provide reciprocal accountability. A drafting and re-drafting process would need to be led by ICCS organisations. Similarly, ICCS organisations and Indigenous peoples would need to be the ones to make the ultimate decision about a final framework.
- Enable a process for developing the evaluation strategy that also recognises and builds in the need to support (including through funding and other means) the further strengthening of Indigenous evaluation expertise, including expertise developed within ICCS organisations. Many ICCS organisations are already engaging in evaluation and have evaluative expertise, but need funding and recognition to be able to continue and strengthen this work. For example, the provision of funding to support professional development of Indigenous evaluators would be extremely beneficial. Such funding could be used as part of the evaluation strategy development process to, for instance, support a delegation of ICCS-based Indigenous Australian evaluators to visit and exchange knowledge with Indigenous researchers and evaluators across the world, such as in Canada, New Zealand and the United States.⁴³ ICCS delegates might then report back to the ICCS forum during the development process for the evaluation strategy. Over the longer term, this could also support ongoing links with an international network of research and evaluation expertise, whereby ongoing knowledge sharing could take place, and international experts also be invited to visit Australia. Indigenous evaluators are far better placed than non-Indigenous evaluators to liaise and work with ICCS organisations to understand how *real* and *meaningful* change can be captured and communicated and undertake evaluative work in a way that decolonises existing practices. Thus, it is absolutely necessary that appropriate resources be dedicated to supporting and strengthening this expertise.
- Advocate for funding practices that uphold (rather than undermine) the self-determination of ICCS organisations. This would enable ICCS organisations to be the ones to lead the important work needed to truly pursue outcomes for their communities and peoples, and to hold governments to account through evaluation. Currently, the bulk of funding for Indigenous service delivery does not sit with the ICCS. Funding that *is* diverted to ICCS organisations is generally short-term, small-scale and insecure. If evaluations are attached to each funding agreement within the current disempowering administrative framework, the result will be the intensification of the already crushing reporting burdens. A good evaluation strategy needs to be anchored in a secure, empowering funding model for ICCS organisations.

⁴³ For example, the National Congress of American Indians (NCAI) Policy Research Centre works to ensure research evidence informs policy development in a way that upholds and supports the sovereignty of Native American Indian peoples. See: <http://www.ncai.org/policy-research-center/our-work>