

Aboriginal Peak Organisations Northern Territory

An alliance of the CLC, NLC, CAALAS, NAAJA and AMSANT

Department of the Prime Minister and Cabinet
PO Box 6500
Canberra ACT 2600
Australia

Via email: Shane.Johnson@pmc.gov.au

Monday 30 October 2017

RE: APO NT Submission on the Exposure Draft of the Indigenous Advancement Strategy's Evaluation Framework: (October 2017)

I write on behalf of the Aboriginal Peak Organisations of the Northern Territory (APO NT), and welcome the opportunity to provide a submission on the Exposure Draft of the Indigenous Advancement Strategy's Evaluation Framework. I also note that the Aboriginal Medical Services Alliance (AMSANT), one of our member organisations, have contributed to a NACCHO submission, which has been provided to PM&C.

APO NT is an alliance of five peak Aboriginal organisations: the Northern and Central Land Councils, the North Australian Aboriginal Justice Agency, the Central Australian Aboriginal Legal Aid Service and AMSANT. Since establishment in 2010, we have advocated for practical policy solutions for Aboriginal people living in the Northern Territory on a wide range of issues, including, but not limited to, alcohol, governance and management, housing, youth justice and remote service delivery.

The Draft Evaluation Framework sets out reasonable principles, does not prescribe particular methods and recognises that methods have to suit the questions. However, the words and style expressed in the Framework, suggest that the evaluation will be centrally controlled and methodologically simplistic. We look forward to the opportunity to provide input into the further development of this Framework in its next stage of development.

APO NT recommends:

- That PM&C take a broad view and provide an evaluation framework that not only provides a structure for the review of individual IAS projects and programs, but also provides a mechanism for assessing linkages to national contexts and the Closing the Gap framework;
- That PM&C acknowledges and addresses the fact that this Framework only evaluates programs and activities funded within the IAS, but there continue to be no mechanisms to evaluate the IAS itself. There are numerous issues within the IAS's internal administration, engagement, funding application criteria, approvals, transparency and implementation processes which have been identified in the 2017 ANAO performance audit and the 2015

Senate Inquiry. These issues must be addressed through the design and implementation of an evaluation framework for the IAS itself;

- A stronger initial focus on the cultural, social and historical contexts within which this framework is being developed would ensure this document is culturally aligned to the challenges in which it is to operate;
- That evaluation of cultural competency should be local and specific;
- That the Framework acknowledges that effective evaluation of programs delivered to Indigenous people must be systematically and purposely designed and led by Indigenous people and guided by Indigenous methodologies. Best practice evaluation standards require the involvement of local service providers and recipients in the evaluation design and implementation process;
- The framework currently seems to position ongoing activity monitoring and back end evaluation as separate to each other, and framed separately as performance and evaluation frameworks. However, there is growing evidence that the 'middle ground', between outputs and impacts, is where evaluation can provide an important contribution to achieving results and where evaluation resources can be better directed;
- That PM&C integrate the APO NT Partnership Principles¹ into the Framework, to ensure compliance; and
- While APO NT is encouraged to see a commitment to transparency by making evaluations public, we suggest that clear criteria are required for any circumstances where evaluations might not be able to be released publicly, and standards that ensure the privacy of communities is protected in public reports. We also suggest there is a focus on communicating the results of evaluations to Indigenous communities and organisations to ensure downward accountability to ensure they have access to the findings and can implement lessons learned.

APO NT is also aware that the IAS is undertaking a review of KPIs and Performance Framework, and requests that this be an open and transparent process that allows for input from Indigenous organisations and other key stakeholders.

To discuss this submission further, please contact Brionee Noonan, APO NT Coordinator by phone on 08 8944 6672 or via e-mail to Brionee.noonan@amsant.org.au.

¹ To give practical effect to Aboriginal community control and empowerment, the APO NT Partnership Principles were developed in recognition of the need to prioritise and expand Aboriginal-controlled service delivery and development work and on the basis of APO NT's experience, that a fundamental shift is required in policy approaches towards Aboriginal communities from a narrow service delivery focus to one based on a development approach. The Principles can be viewed [here](#).

Yours sincerely,



Priscilla Atkins
CEO
NAAJA

On behalf of:

John Paterson CEO AMSANT	Priscilla Collins CEO NAAJA	David Ross Director CLC	Leeanne Caton Acting CEO CAALAS	Joe Morrison CEO NLC
--------------------------------	-----------------------------------	-------------------------------	---------------------------------------	----------------------------