



**Australian Evaluation Society Limited (AES)  
ACN 606 044 624**

**Submission to the Productivity Commission's whole of  
government evaluation strategy for policies and programs  
impacting on Indigenous Australians**

**August 2019**

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Karen Carmichael

Indigenous Evaluation Strategy  
Productivity Commission  
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28 August 2019

Dear Ms Carmichael

The Australian Evaluation Society (AES) welcomes the opportunity to provide a submission to the Productivity Commission's project to fulfil the terms of the Letter of Direction by the Treasurer the Hon Josh Frydenberg MP dated 10 April 2019.

The AES is a member-based organisation established in 1982. The AES is the leading professional body for evaluation in Australia which exists to improve the theory, practice and use of evaluation. Members include people involved as evaluation practitioners, managers, teachers and students of evaluation, and other interested individuals. The AES has over 1000 members involved in all aspects of evaluation and performance measurement.

We recognise the importance of providing a sound foundation on which the Australian Government can measure whether their policies and programs are making a difference to outcomes for Indigenous peoples.

We wish to reinforce the importance of the Productivity Commission's stated intention of engaging with Indigenous communities to incorporate Indigenous knowledge and perspectives in the development of the strategy. It is also imperative that the strategy will embed culturally safe and ethical approaches to all evaluation effort by Australian Government agencies.

This submission has been prepared by the AES Cultural Capacity and Diversity Committee, which reports to the AES Board. The Issues Paper raised several important and complex issues about evaluation and appropriate evaluation practice relating Aboriginal and Torres Strait Islander people.

The AES therefore offers this submission in the spirit of an initial formal response from the Board on behalf of AES members. We would greatly value the opportunity to consult with the Commission further about the issues raised.

If you wish to discuss or inquire about any aspect of this submission, please contact the Bill Wallace, Chief Executive Officer.

Yours sincerely

John Stoney  
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August 2019

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## Executive summary

In preparing this submission on behalf of its members, the Australian Evaluation Society (AES) recognises the unique position and contribution of Indigenous peoples in Australia, New Zealand and the many nation-states of the wider Australasian-Pacific region.

Through the AES Cultural Capacity and Diversity Committee, which reports to the Board, this submission aims to bring an 'Indigenous lens' to our responses to the following questions raised in the Issues Paper:

1. Objectives of the Strategy
2. Components of the Strategy
3. Mainstream and Indigenous specific programs
4. Evaluation approaches and methods
5. Methods and data
6. Challenges of evaluation
7. Evaluation practice in Australia
8. Evaluation planning
9. Indigenous perspectives in evaluation
10. Ethical evaluation
11. Cultural capability
12. Improving evaluative culture, capability and capacity
13. Enabling mechanisms for effective evaluation
14. Engaging with community and experts

The submission also provides background information about strategies the AES has adopted to support strengthening and building Indigenous and non-Indigenous capacity in culturally safe evaluation theory, practice and use.

Given the Productivity Commission's stated intention of engaging with Indigenous communities to incorporate Indigenous knowledge and perspectives in the development of the Strategy, the submission proposes a government-community partnership and a whole of government model to the development the Strategy.

## Introduction

Our submission is guided by the key questions raised in the Issue Paper. Several questions relate to broader contextual, conceptual and cultural aspects of significance to Indigenous people. Others relate to technical matters in undertaking monitoring and evaluation of Indigenous policies and programs.

Our response to the Issue Paper outlines the role of the AES, our strategic focus on strengthening evaluation of Indigenous policies and programs, as well as providing some initial insights about the challenges that developing a whole of government Indigenous Evaluation Framework and Strategy is likely to entail. Bringing an 'Indigenous lens' to the development of the strategy and the monitoring and evaluation activities it is intended to support is the underlying premise of this submission.

Given the very broad range and depth of issues outlined in the Issues Paper, this submission focuses on a select number of questions raised. The AES is available to assist the Productivity Commission to explore these and the remaining questions in more depth, if required.

### Structure of the submission

The submission comprises three parts:

Part A presents the AES perspective about evaluation of Indigenous policies and programs.

Part B provides the AES response to the key questions raised in the Issues Paper

Part C focuses on engaging with community and experts to fulfil the terms of the Letter of Direction.

### What is evaluation?

The following conceptualisation of evaluation underpins this submission to the Productivity Commission in developing an Indigenous Evaluation Strategy.

Evaluation encompasses the systematic collection and analysis of information to answer questions, usually about the effectiveness, efficiency and/or appropriateness of an ongoing or completed activity, project, program or policy. Evaluation professionals adopt a broad range of formal approaches, social science methods and stakeholder engagement activities to provide fit-for-purpose evidence.

Evaluation is often used at the end of a policy or program cycle (referred to as summative or impact evaluation). However, it can also be used to assess whole-of-government performance, provide information for continuous improvement, and it is a powerful tool in design and implementation (referred to as formative evaluation). Indeed, evaluative inquiry can be undertaken across the policy and program lifecycle to:

- enhance public sector planning and operations and inform budgetary decisions
- help identify and measure the need for a policy or program, or understand best practice
- clarify and strengthen policy and program conceptualisation and design (including

what the expected activities, outputs and outcomes are, when these are expected to occur and in what sequence, and what data is needed to measure these)

- support implementation by assessing reach, dose, fidelity, context (process) and identifying opportunities for improvement during roll-out
- inform ongoing program management and accountability/measurement by identifying and producing sound data and indicators, and
- identify the outcomes, impacts effectiveness, efficiency and lessons learned of the policy and program (and in turn, inform budget allocations).

## **Part A. AES focus on evaluation of Indigenous policies and programs**

### **AES focus on culturally safe evaluation theory, practice and use**

The AES has a strong strategic and operational focus on diverse communities, inclusiveness and representation from Aboriginal and Torres Strait Islander, and other Indigenous members in the AES community.

The following information is provided to share with the Productivity Commission the strategies the AES has adopted to support strengthening and building Indigenous and non-Indigenous capacity in culturally safe evaluation theory, practice and use.

### **AES Constitution**

The AES Constitution (2018) was formally adopted by a Special General Meeting of Members in August 2018 and provides a statement of inclusiveness of Indigenous peoples in the preamble:

*The AES aims to be inclusive of the diverse communities that make up its membership. It aims to be inclusive of members' nations, backgrounds, genders and abilities. One way that this inclusiveness is implemented is that the AES board at any given time, shall include, to the extent available, representatives of the groups that make up the AES community and have representation from Aboriginal and Torres Strait Islander, and other Indigenous members.*

*The AES recognises the unique position and contribution of Indigenous peoples in Australia, New Zealand and the many nation-states of the wider Australasian-Pacific region. To that end, as a society, and in a spirit of partnership and mutual respect, the AES supports and affirms the rights of Indigenous peoples as outlined United Nations Declaration on the Rights of Indigenous Peoples.*

### **Governance and Indigenous Board Members**

The Board consists of three named office bearers (President, Vice-President, and Treasurer) and three ordinary board members. The Board has the discretion to appoint up to three additional ordinary board members, ensuring that at least two members of the Board are Indigenous. Source: <https://www.aes.asn.au/aes-governance/board.html>

### **AES Cultural Capacity and Diversity Committee**

The Cultural Capacity and Diversity Committee is one of five key committees that underpin AES governance (see <https://www.aes.asn.au/aes-governance.html>).

The purpose of the Cultural Capacity and Diversity Committee is to contribute to building a society of evaluators with an appreciation for, understanding of, and capacity to undertake, high quality Indigenous evaluation. The committee fulfils this purpose by:

- guiding and advising the AES Board and its members on the importance of cultural competence in evaluation theory and practice to ensure quality evaluation and best practice
- ascertaining the needs of new and emerging, mid-level and senior Indigenous evaluators

- developing processes, policies and programs which strengthen the capacity and capability of Indigenous evaluators of all levels
- supporting members of the Society working with Indigenous communities to do so in a culturally competent manner, and
- advising the AES Board on the importance of building relationships, skills, and systems to better include Indigenous voices in evaluation

### **AES Strategic Plan 2016 - 2019**

The Board formally adopted the (current) 2016-2019 Strategic Plan to inform the AES work from July 2016 to June 2019. The core domains include:

- Cultural capacity: Strengthen and build Indigenous and non-Indigenous capacity in culturally safe evaluation theory, practice and use.
- Influence: Promote the use of evaluation and evaluative thinking by agencies and organisations.
- Professionalism: Strengthen the capacity and professionalism of the evaluation sector.
- Relevance: Strengthen the value proposition of AES membership.
- Organisational sustainability: Maintain good governance and broaden our revenue base.

Source: <https://www.aes.asn.au/aes-strategic-priorities-2016-2019.html>

The 2019-2022 AES Strategic Priorities will be shortly launched at the 2019 AES International Evaluation Conference, with Cultural Capacity remaining a key domain.

### **AES Reflect Reconciliation Action Plan**

The Reflect Reconciliation Action Plan (RAP) was the result of more than a year of collaborative work by the Cultural Capacity and Diversity Committee (CCDC), and the Board. All AES members are encouraged to actively engage with the initiatives and activities presented in RAP, as we work together to improve evaluation's engagement, respect for and collaboration with Aboriginal and Torres Strait Islander peoples. The AES RAP 2018-2019 comprises four pillars and ten actions relating to:

1. Relationships
2. Respect
3. Opportunities
4. Governance and Tracking

Reference is made to actions identified in the RAP in Part B of this submission. The cover artwork of the RAP, *Waterways Dreaming*, is by the artist Trevor Barkindji. The artwork was supplied by The Torch, a project that provides support to Indigenous offenders and ex-offenders in Victoria through art, cultural and arts vocational programs [www.thetorch.org.au](http://www.thetorch.org.au)

Source: [https://www.aes.asn.au/images/stories/files/Publications/Australian\\_Evaluation\\_Society\\_Reflect\\_RAP\\_2018-2019\\_-\\_FINAL.pdf](https://www.aes.asn.au/images/stories/files/Publications/Australian_Evaluation_Society_Reflect_RAP_2018-2019_-_FINAL.pdf)

### **AES Indigenous Conference Supports Grants**

The Indigenous conference support grants are awarded to new and emerging Indigenous evaluators to attend the AES International Conference. The 2019 AES conference and workshop program will be held in Sydney from 15-19 September.

The grants cover the cost of travel and accommodation with conference registration covered by the AES. Australian Government, corporate and individual sponsorship have been provided since the commencement of the support grants in 2010. Since that time, over 60 Indigenous evaluators, from Australia, New Zealand and the Australasian-Pacific region, have been provided support to attend and build capacity in evaluation through the conference and workshop program.

A professional mentoring network pilot program focussing on emergent Indigenous evaluators will be trialled in 2019-2020.

## **Part B. AES response to the Issues Paper**

The AES response to the questions raised in the Issues Paper is provided below. Given the very broad range of issues outlined in the paper, this submission focuses on a select number of questions.

The purpose of the Issues Paper is clearly to seek public submissions about evaluation of Indigenous policies and programs. However, many of the same issues, challenges and complexities apply to whole of government approaches to evaluation of policies and programs affecting the broader Australian population. Several of the questions pertain to these issues, and seek information about governance, structural and priority setting processes.

Our response to the questions raised in the Issues Paper is nevertheless focussed on Indigenous policies and programs, and our considered opinion about how the Indigenous Evaluation Strategy can be developed and implemented to improve outcomes for Indigenous people. However, some of these opinions could equally be applied to other policies and programs designed and implemented by Australian Government agencies.

In recent years the AES has provided responses to the following independent reviews:

- *The Review of Public Governance, Performance and Accountability Act 2013 and Rule* (September 2017)
- *The Independent Review of the Australian Public Service –* (July 2018 and May 2019).

While the scope of the terms of reference for both reviews related to Australian Government public policies and programs more broadly, the AES submissions focussed advice about evaluation, and reference is made to these reviews, where relevant.

## QUESTIONS RAISED IN THE ISSUES PAPER

### OBJECTIVES

***What objectives should a strategy for evaluating policies and programs affecting Aboriginal and Torres Strait Islander people seek to achieve?***

***To what extent are the evaluation practices of Australian Government agencies consistent with the United Nations Declaration on the Rights of Indigenous Peoples? How could practices be improved in this respect?***

In terms of the objectives of the Indigenous Evaluation Strategy, there is a need to address:

- Cultural awareness of the history of Aboriginal and Torres Strait Islander people by the Australian Public Service evaluation commissioners and practitioners who evaluate policies and programs affecting Indigenous people
- Institutional capacity and capability issues in the Australian Public Service in respect of evaluation generally, and specifically undertaking culturally safe, appropriate and effective evaluation
- Issues relating to politics versus good practice in Indigenous affairs
- The generation and use of quality evidence to support evaluations, and
- Bias (unconscious or otherwise) in policy and program decision-making and evaluation practice.

Consistency of evaluation practices with the *United Nations Declaration on the Rights of Indigenous Peoples* is supported. We acknowledge that the extent to which Australian Government agencies practices are consistent with the UN Declaration is likely to vary significantly, with some agencies more mature than others.

Overall, the APS could to improve capacity to design and deliver effective programs, based on:

- Community driven policy (inclusive, engaging and relevant) – i.e. not simply targeting political objectives
- Quality program designs – i.e. using program logic, theory of change and clear and measurable targets etc
- Commissioning quality evaluations – i.e. setting evaluation points in program designs, evaluations are comprehensive and look at more than just a small set of program related activities, and quality measures are set for evaluation activities in program design
- Evaluation is an integral part of policy and program design and performance, not something added on at the end.

## COMPONENTS OF THE INDIGENOUS EVALUATION STRATEGY

*Do you agree with the main components of an Indigenous Evaluation Strategy suggested by the Commission? Should other components be included? If so, why?*

The proposed Evaluation Strategy includes the following main components (Source: image from page 4, Issues Paper, 2019):



The AES supports these as the main components of the Strategy. Our comments relate to how the components of the Strategy could be developed, implemented and reviewed:

1. A principles-based framework should be the foundation stone of the Strategy. The principles should be developed in consultation with Indigenous people and applicable across all Australian Government portfolios. The framework should include both monitoring and evaluation aspects.
  - Consultation about the principles relevant to Indigenous people will enable the framework to be culturally appropriate to diverse Indigenous perspectives
  - Monitoring and evaluation should not be artificially separated in the Strategy. Some policies and programs may be monitored only, and others can use monitoring data as part of evaluation activities.
2. The broad principle-based framework should enable agencies to scope their monitoring and evaluation priorities relevant to their portfolio policy and program responsibilities. The framework should assist and inform a consistent approach to evaluation priority setting processes without being overly prescriptive.
  - Consistency in application of the principles to monitoring and evaluation is important for a whole of government approach
  - Flexibility to determine priorities at an agency level in alignment with the principles is important to enable monitoring and evaluation to be fit-for-purpose.
3. The Strategy should support different agencies at different levels of evaluation maturity to build an evaluative culture, and improve their capacity and capability to conduct, commission and manage evaluations of Indigenous policies and programs.
  - The APS and individual portfolios have different organisational cultures, histories and experience with evaluation, and in Indigenous affairs
  - The structures and processes adopted within different agencies should encourage and support staff to build evaluation maturity relevant to their organisation but aligned to the principle-based framework.

4. The Strategy should support agencies and APS staff to adopt processes which engender:
  - Cultural safety and ethical evaluation practice for Indigenous policies and programs
  - The use of evidence for policy design and evaluation purposes
  - The use of administrative data sets and data linkage to inform policy and program design and evaluation practice
5. The Indigenous Evaluation Strategy should be reviewed and revised based on:
  - Reports on the processes adopted to build evaluation maturity (as in points 3&4 above)
    - To acknowledge differences in organisational and evaluation maturity across the APS
    - For accountability purposes to government
    - To demonstrate progress with implementing the Strategy
    - To identify areas for improvement in the Strategy or areas requiring attention
  - Consultation and reports from Indigenous people involved in the design and evaluation of Indigenous policies and programs
    - To bring an 'Indigenous lens' to the way the Strategy has been implemented
    - To identify areas for improvement in the Strategy or areas requiring attention

## **APPLYING THE STRATEGY TO MAINSTREAM PROGRAMS**

### ***What is the best way to address mainstream programs in the Indigenous Evaluation Strategy?***

We understand the Indigenous Evaluation Strategy is intended to inform a consistent whole of government approach to evaluating both mainstream and Indigenous specific programs which impact on Aboriginal and Torres Strait Islander people. In this regard, the principle-based framework should also apply, and provide guidance to, evaluating mainstream and Indigenous specific programs across various Australian Government agencies.

Overall, evaluating mainstream programs should consider equity of access, cultural appropriateness, quality of services along with efficiency, effectiveness and impact in relation to the outcomes for Indigenous people.

At the same time, the Strategy should not advocate a 'one-size-all approach' to the evaluation of mainstream, or Indigenous specific, policies and programs which impact on Indigenous people. Nor should the Strategy limit evaluation approaches to mainstream programs that are based only on identification of Indigenous people within administrative data sets, for example Medicare, hospital services, social, welfare and other services. Comparative analysis of outcomes between Indigenous people and other Australians also accessing mainstream programs should be supported by the Strategy.

In relation to addressing the evaluation of mainstream policies and programs in the Strategy:

- Evaluation of mainstream programs need to consider the rationale and ideological basis for mainstreaming
  - was the decision based on quality evidence?
  - has the program worked as intended?

- were there any unintended consequences in mainstreaming?
- What are benefits and costs of mainstream programs?
  - are current approaches and practices in mainstreaming making the most of these?
  - are these approaches and practices getting the balance, right?
  - has mainstreaming benefited Indigenous or non-Indigenous interests?

## **GOVERNMENT PROGRAMS**

### ***What lessons from these and other major Australian Government programs impacting on Aboriginal and Torres Strait Islander people would be useful in developing an Indigenous Evaluation Strategy?***

The Issues Paper (page 6-11) presents information about existing Australian Government programs, including how they have been evaluated.

The AES makes the following comments about the implications of developing a whole of government Indigenous Evaluation Strategy to apply across all Australian Government Agencies with responsibility for policies and programs that impact on Aboriginal and Torres Strait Islander people.

Under the Strategy, the Productivity Commission needs to consider how it will effectively evaluate coherence of programming to policies:

- Policy and programs should be evidence-based
  - For example, programs with significant community interest should be comprehensively evaluated to identify any program shortfalls and encompass Indigenous community perspectives in culturally appropriate ways
- Long term strategies that survive political cycles are needed to deliver sustainable social and economic outcomes for Indigenous Australians
  - The Indigenous Procurement Policy may prove to be a transformative program for Indigenous business growth and economic development once issues like ‘black cladding’ are addressed to ensure confidence in the model and there is consistent implementation and monitoring across Government
- Government policies plans and programs should be monitored and evaluated to test whether they are successfully implemented and have delivered the outcomes expected by Indigenous Australians.

## **EVALUATION APPROACHES AND METHODS**

***Which evaluation approaches and methods are particularly suited to policies and programs affecting Aboriginal and Torres Strait Islander people?***

***What factors (for example, circumstances or program characteristics) should be considered when choosing the most appropriate evaluation approach or method, and why?***

***Which evaluation approaches are best suited to encouraging self-determination and valuing Aboriginal and Torres Strait Islander knowledges? Why are they suitable?***

In terms of adoption of evaluation methods and approaches at Australian Government level, the AES in its 2<sup>nd</sup> submission to the Independent Inquiry into the Australian Public Service suggested the adoption of an interdisciplinary model of evaluation that does not privilege particular evaluative, or methodological approaches, or type of evidence.

- This reflects the complex environment in which the APS operates. To enable the APS to engage and respond to this complexity, evaluations and other evidence need to go beyond "did it work" to answer questions about "what works, for whom, under what circumstances and when", positioning it to adapt to different situations and cultural contexts.
- Such an approach is consistent with the enhanced Commonwealth Performance Framework, which provides an overarching structure and consistent framework, but does not take a prescriptive approach as to how entities actually assemble performance information - they enable flexibility at an entity level to adopt approaches and methods that are fit-for-purpose for their particular context.

In addition to this, the AES would also suggest that in relation to evaluation of policies and programs affecting Aboriginal and Torres Strait Islander people, the approach and methods must be informed by engagement and consultation with community, be consistent with culturally safe and respectful practice and key ethical and practice guidelines.

In addition to the approaches and methodologies that are identified in the Issues Paper, other examples that may be appropriate include (but are not limited to):

- Theory driven approaches and methods which are designed based on a clear theory of change, program theory or logic model can be used to answer evaluation questions which relate to the policies and programs and their specific impacts on Aboriginal and Torres Strait Islander people. Developing the theory of change, program theory or program logic with Indigenous people and communities helps to underpin the design and methods which are more culturally appropriate to the communities in which the evaluation is being conducted<sup>1</sup>.

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<sup>1</sup> Note: A relevant source of information about program theory is: Funnell S C and Rogers P J, 2011 Purposeful Program Theory: Effective Use of Theories of Change and Logic Models ISBN 978-0-470-47857-8

- Case based, participatory and collaborative designs that genuinely involve Indigenous people and / or
- Mixed designs that include case based, participatory, collaborative and placed-based approaches combined with experimental, quasi-experimental methods, statistical and other designs used to measure impacts.

Policies and programs can present a range of complicated or complex factors and circumstances that need to be understood and taken on board before adopting a particular evaluation approach or method.

Engaging with Indigenous people in co-design processes, would enable the factors that are important to them to be fully considered in the approaches and methods to be decided.

A community partnership approach would enable Indigenous community representatives to oversight and advise on evaluation approaches and practice (i.e. both overall and on a case by case basis).

Engaging Indigenous people in co-design processes, would encourage self-determination and valuing of Aboriginal and Torres Strait Islander knowledges.

Some evaluation approaches that enable the self-determination and agency may include case based, participatory, collaborative approaches, e.g. empowerment, democratic, strengths based, place-based evaluation approaches. Again, a partnership approach with Aboriginal community representatives would encourage self-determination and valuing of Aboriginal and Torres Strait Islander knowledges, as part of the processes adopted in an evaluation.

In addition to the approaches identified above, and in the Issues Paper, we also suggest there is a need to be open to new approaches and ways of undertaking evaluation, that reflect and privilege an Indigenous construct of the world.

### ***In what ways can Indigenous and Western evaluation approaches be successfully combined?***

Some useful examples of projects or organisations that the Productivity Commission may wish to consider investigating further include:

1. Strengthening Evaluation Practices and Strategies (STEPS) - identified funding practices responsive to First Nation needs and priorities as pivotal to community-engaged program planning and evaluation findings honouring and benefitting First Nation communities. Building and maintaining relationships with community was central to the cultural integrity of the overall evaluation. (Note: reference to STEPS was permitted by Professor Margaret Cargo, University of Canberra – 27 August 2019)
2. Healing Foundation - <https://healingfoundation.org.au> (Note: reference to the HF was permitted on 28 August 2019)
3. Indigenous Community Volunteers - <https://www.icv.com.au/publications/> & <https://www.icv.com.au/approach/> (Note: reference to ICV was permitted on 28 August 2019)

## **EVALUATION METHODS AND DATA**

***What types of evaluation approaches and methods are currently used to evaluate Indigenous programs? How could evaluation methods be improved to ensure robust and reliable evidence is produced?***

***To what extent does a lack of high-quality, accessible data, including data gaps, act as a barrier to undertaking effective evaluation of policies and programs affecting Aboriginal and Torres Strait Islander people?***

As mentioned above, a range of approaches and methods are used to evaluate programs affecting Aboriginal and Torres Strait Islander people. However, not all evaluations are necessarily conducted in a way that is respectful to communities, or in a manner that provides evidence from diverse Indigenous perspectives. In addition, the notion of what is 'evidence' from a western perspective is not necessarily the same as for Indigenous peoples.

Essentially, evaluation approaches and methods could be improved by enabling appropriate community engagement and consultation with communities in which the program is being delivered; and by being consistent with culturally safe and respectful practice and key ethical and practice guidelines.

## **CHALLENGES OF EVALUATION**

***How can the challenges and complexities associated with undertaking evaluation be overcome — both generally, and in Indigenous policy specifically?***

***In what circumstances is evaluation of policies and programs unlikely to be feasible or cost-effective***

The extent to which evaluation is being undertaken across and within the APS has been of interest to both the *Independent Review of the Public Governance Performance and Accountability Act 2013 and Rule*, and the *Independent Review of the Australian Public Service*

A finding of the *Independent Inquiry into the PGPA Act and Rule* was that the use of evaluation had fallen away, and that it should be re-invigorated.

This resulted in Recommendation 4:

*“The Secretaries Board should take initiatives to improve the quality of performance reporting, including through more effective and informed use of evaluation, focusing on strategies to improve the way Commonwealth entities measure the impact of government programs.”*

In response to initial calls for submissions to the *Independent Review of the Australian Public Service*, the AES noted a number of current challenges and issues. It proposed the review should consider options for developing appropriate organisational infrastructure and support systems for evaluation and policy evidence, capable of informing policy decision-making and showing the effectiveness of the APS.

This included:

- investment in better systems
- increasing the level of performance and evidentiary literacy of APS staff
- ensuring a critical mass of staff with specialist technical expertise existed
- encouraging a culture of performance management
- institutional infrastructure.

Following the release of its 'Priorities for Change' interim report and associated discussion papers in April 2019, the AES lodged a second submission, proposing:

- an enabling environment for performance (including evaluation) led by senior leadership
- institutionalising evaluation through the introduction of a 'networked hub-and spoke' model, with a whole of Australian Government centralised function operating collaboratively with centralised evaluation functions in each department
- support for the introduction of a professions model in the APS (which would include evaluators), and an 'APS Academy' (to build capability and capacity)
- consulting across and outside of government to inform the design and introduction of these and other reforms proposed by the Independent Review.

The AES also proposed developing capability and capacity around culturally safe and appropriate policy, design and performance practices:

*"The APS needs to develop the capability and capacity to undertake collaborative, culturally safe and credible monitoring and appropriate evaluation processes.*

- *It also reflects a need for evaluation practitioners, policy makers and commissioners of evaluation to have the opportunity and a commitment to access cultural ethics and awareness and safety training.*
- *Acknowledgment that there are resource implications associated with culturally safe evaluations.*
- *Efforts need to be made both internally and externally to address this – in collaboration and partnership with First Nations communities".*

As suggested in the Issues Paper, not all policies and programs need to be formally evaluated. Developing a monitoring and evaluation framework for Indigenous policies and programs, using a theory-based approach, will help to determine which areas of government policy are more suitable for either on-going monitoring, and / or for periodic or summative evaluation<sup>2</sup>.

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<sup>2</sup> Note a relevant source of information about developing monitoring and evaluation frameworks is: Markiewicz A and Patrick I, 2015 Developing Monitoring and Evaluation Frameworks SAGE).

The Indigenous Evaluation Strategy needs to consider:

- the framework regarding Commonwealth entities non-financial performance already in place from the *Public Governance Performance and Accountability (PGPA) Act 2013* and its associated *Commonwealth Performance Framework*, and
- any recommendations regarding evaluation that may arise from the *Independent Inquiry into the Australian Public Service*, in order to ensure effective integration and alignment with these.

In addition, the circumstances where policies and programs are unlikely to be feasible or cost-effective will vary across the different Australian Government portfolios. The proposed principles-based Indigenous Evaluation Framework (Issues Paper, page 4) should be the foundation stone of the Evaluation Strategy. In so doing, the framework can assist Australian Government agencies, with different portfolio responsibilities for Indigenous policies and programs, to prioritise their evaluation effort and use the Framework and Strategy, as the basis for obtaining funds to effectively monitor and evaluate their programs.

## **EVALUATION PRACTICE IN AUSTRALIA**

***To what extent do Australian Government agencies currently undertake policy and program evaluation? How does this vary across agencies?***

***Approximately what proportion of evaluations are made public?***

***What are the strengths and weaknesses of current evaluation systems and practices across Australian Government agencies?***

***Can you provide examples of good and bad practice? What can we learn from evaluation systems and practice at the state and territory level?***

AES members have reported contrasting responses in terms of resourcing, effort and commitment from entities. At one end, there are indications of agencies that have reduced their effort and investment in evaluation and performance reporting. At the other, there are cases of increased development in information technology and reporting architecture, increased resourcing to the evaluation function, and a clearer understanding of the role and linkages from evaluation practice through performance and information management, to achieving accountability via being able to tell a performance story.

Recognising the challenges and complexities of public policy design, public expenditure and administration, and the role of evaluation, in our second submission to the APS Review (May 2019), the AES proposed:

*..a “fit-for-purpose” APS would include an institutional infrastructure for evaluation. This infrastructure would consolidate the authorising environment for evaluation and sustain the good governance of evidence in decision-making. It would house strong senior leadership for performance and prioritise investment in performance-related skills (for both generalists and specialists).*

*It would develop capability and capacity around culturally safe and appropriate practices - noting with the development of the AES Reconciliation Action Plan, the AES has*

*demonstrated and will continue to build the evaluation capacity of indigenous evaluators and evaluation in the indigenous context. It would be developed through consultative processes and continuously supported by drawing on internal and external resources and expertise*

## **PLANNING FOR EVALUATION EARLY IN THE POLICY CYCLE**

**To what extent is evaluation planned for during the design and development of policies and programs affecting Aboriginal and Torres Strait Islander people?**

**Is evaluation funded out of program budgets or from a central evaluation budget within agencies?**

**What are the key actions and decisions agencies should take when planning early for evaluation?**

The AES position is that evaluation should be an integral part of policy and program design and performance, not something added on at the end of the policy cycle.

Ideally, both planning and budgeting for evaluation should be early in the policy cycle as possible. For example, evaluation planning and budgeting should be considered when developing new policy proposals (NPPs) and/or when responding to evaluation or reviews of existing policies and programs. Feedback from AES members suggests that evaluation is more commonly funded from program budgets and new policy proposals, rather than a centralised budget.

The reference in the Issues Paper to the Department of Industry, Innovation and Science's *Evaluation Strategy 2017-2021* was noted, as well as the reference to their 'Evaluation Ready' approach. We would encourage the Productivity Commission to examine further both the Strategy and the 'Evaluation Ready' process, as well as the similar 'Evaluation Readiness Service' model within the Department of Social Services.

## **INCORPORATING INDIGENOUS PERSPECTIVES INTO EVALUATION**

***What principles should be included in an Indigenous evaluation framework to be used by Australian Government agencies?***

The AES supports principled-based evaluation framework to underpin the Indigenous Evaluation Strategy as proposed in the Issues Paper. We also acknowledge the range of principles suggested in the Issues Paper (Page 26-27).

While the PC is seeking ideas about the principles that should be included in the Indigenous Evaluation Framework to be used by Australian Government agencies, the AES advises that these be agreed and finalised through consultation with Indigenous people.

Some suggested principles for the Indigenous Evaluation Framework include:

*Principle:* Place the emotional and social wellbeing of Indigenous people at the centre of policies and programs, and / or as a priority of key performance indicators

*Principle:* Strengths-based approach to evaluation

*Principle:* Indigenous empowerment and self-determination

*Principle:* Culturally safe evaluation practice

*Principle:* Respect for diverse Indigenous perspectives

*Principle:* Ethical evaluation practice

*Principle:* Collaborative, inclusive evaluation practice that genuinely involves Indigenous people in policy, program design and evaluation

*Principle:* The outcomes of evaluations are communicated and reported to Indigenous people

***How should an Indigenous evaluation framework differ from a general evaluation framework for government policies and programs?***

Evaluation frameworks for government policies and programs may have similar elements to an Indigenous specific framework. However, many general evaluation frameworks are for specific types of policies and programs, e.g. health, social and welfare, disability services, criminal justice, industry, education, environmental, financial services, housing, infrastructure etc.

These general frameworks focus attention on the government policies, programs and systems which are funded, delivered or regulated by government and consideration is then given to particular population groups within the general population which are impacted by the policy or access the program. Some of these general evaluation frameworks may also focus on Aboriginal and Torres Strait Islander people within the context of the specific policy or program.

On the other hand, the PC's proposed whole of Australian government principle-based Indigenous Evaluation Framework and Strategy will be focussed on Aboriginal and Torres Strait Islander people and the broad range of policies and programs that affect them, including mainstream services. This is the main and important difference that the Indigenous Evaluation Framework should have to a general evaluation framework, as well as being based culturally appropriate principles for Indigenous people

Examples of evaluation principle-based frameworks that focus on Indigenous people across different policies and programs, include:

- The Indigenous Advancement Strategy (IAS) evaluation framework (released by Prime Minister and Cabinet on February 2018) - the National Indigenous Australians Agency (established in July 2019).
- Kelaher M et al (2018) An Evaluation Framework to Improve Aboriginal and Torres Strait Islander Health Report prepared for The Lowitja Institute

***How are Aboriginal and Torres Strait Islander knowledges, perspectives and priorities currently incorporated into the design and conduct of Australian Government evaluations of Indigenous-specific and mainstream policies and programs? How could this be improved?***

The AES would like to outline several ways the incorporation of Aboriginal and Torres Strait Islander knowledges, perspectives and priorities could be supported and enhanced, including:

1. Employment of Aboriginal and Torres Strait Islander people in Australian Government agencies with responsibility for policies and programs that impact on Indigenous people – as policy developers, program designers and / or evaluation advisors
2. Involving Indigenous people in co-design processes, for both program design and evaluation in Australia is one way to improve the incorporation of their knowledges, perspectives and priorities. Examples include:
  - Empowered Communities – National Indigenous Australians Agency
  - Indigenous Comprehensive Primary Health Care Evaluation Co-design Project - Department of Health
3. Engaging Indigenous evaluation consultants to design and conduct evaluations – through procurement of these services under the Indigenous Procurement Policy (IPP).
4. Increasing the number of Indigenous evaluation consultants on evaluations being conducted by non-Indigenous evaluation businesses
5. Training of non-Indigenous APS staff in cultural safety and ethical approaches to engaging Indigenous people in evaluations of Indigenous-specific and mainstream policies and programs.

## **ETHICAL EVALUATION**

***How do Australian Government agencies currently deal with ethical issues associated with evaluation?***

***Do existing ethical guidelines for evaluation and research provide sufficient guidance for evaluation commissioners, evaluators and participants in evaluations of programs affecting Aboriginal and Torres Strait Islander people? To what extent should the Indigenous Evaluation Strategy build in these guidelines?***

***In what circumstances should evaluation projects be subject to formal ethics review? In what circumstances should evaluation projects be exempt from formal ethics review?***

***What are the time and cost implications of embedding an ethics review process into Australian Government evaluations?***

The AES supports the ethical conduct of all evaluation. The AES promotes the Code of Ethics as part of its aim to improve the theory, practice and use of evaluation. In promoting the Code, the Society adopts an educative and developmental approach, seeking understanding and resolution of ethical issues through discussion and consultation.

Upholding the Code is a condition of membership of the Australian Evaluation Society. By signing the membership application and membership renewal forms, members indicate their acceptance of this condition.

The AES Code of Ethics and guidelines were revised in 2013:

[https://www.aes.asn.au/images/stories/files/membership/AES\\_Code\\_of\\_Ethics\\_web.pdf](https://www.aes.asn.au/images/stories/files/membership/AES_Code_of_Ethics_web.pdf)

Feedback from our members indicates that, for some Commonwealth entities at least, ethics clearance and review processes are a requirement of the commissioning body, applying some or all of the following guidelines;

- AIATSIS: <https://aiatsis.gov.au/sites/default/files/docs/research-and-guides/ethics/gerais.pdf>
- NHMRC: <https://www.nhmrc.gov.au/research-policy/ethics/ethical-guidelines-research-aboriginal-and-torres-strait-islander-peoples>
- NHMRC: <https://www.nhmrc.gov.au/about-us/resources/ethical-conduct-research-aboriginal-and-torres-strait-islander-peoples-and-communities>

and using an independent ethics committee authorised through these bodies.

The AES fully supports the ethical conduct of evaluations of policies and programs affecting Aboriginal and Torres Strait Islander people. We propose ethical evaluation practice as a key principle of the Indigenous Evaluation Strategy (see page 23 of this submission). The Indigenous principles-based framework would then embed the requirement that ethical processes (i.e. through the AIATSIS NHMRC and AES), are adopted in evaluations and provide consistent guidance across Australian Government agencies.

Seeking ethics approval and mandating formal review processes for all evaluations under the Indigenous Evaluation Strategy will have timing and resource implications, depending on the ethical risks and size of the evaluation project.<sup>3</sup> However, this would provide a sound process for obtaining independent judgement through an ethics committee, about the ethical implications of proposed evaluation approach and methods and managing the ethical risks that arise during the conduct of evaluations.

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<sup>3</sup> Feedback from members suggest this could cost in the range of \$5-15,000 in terms of cost and from several weeks to several months in terms of time.

## **CULTURAL CAPABILITY**

**How can the cultural capability of evaluation commissioners and practitioners and their respect for Aboriginal and Torres Strait Islander be demonstrated and improved?**

This is a crucially important issue to address in the Indigenous Evaluation Strategy and thereby support commissioners and practitioners to build cultural capability and respect for the culture, knowledges, history and values of Aboriginal and Torres Strait Islander people.

Some strategies that the AES has adopted for building capacity, capability and respect for the culture, knowledges, history and values of Aboriginal and Torres Strait Islander people include:

- Since 2016, the Board and staff members have participated in an annual-two-day workshop 'Cultural Respect and Safety – Engaging Respectfully with Aboriginal Australians. We would like to make this workshop available to all members and others through the AES Professional Workshop series.
- Action 5 of the AES Reconciliation Action Plan is to Investigate Aboriginal and Torres Strait Islander cultural learning and development. This includes developing a business case for increasing awareness of Aboriginal and Torres Strait Islander cultures, histories and achievements within the AES.
- Action 7 is to raise internal understanding of Aboriginal and Torres Strait Islander cultural protocols, including Acknowledgment of Country, Welcome to Country and local cultural protocols

We aware that Australian Government agencies have introduced cultural awareness and training for staff (in some cases, mandating this). Similar capacity and capability training need to be made available in relation to commissioning research, evaluation and data-related projects.

## **IMPROVING EVALUATIVE CULTURE, CAPABILITY AND CAPACITY**

***How much scope do you consider there is to improve evaluative culture, capability and capacity for both those who undertake evaluations, and those who participate in the evaluation process? And how might improvements be achieved?***

***What resources are currently available to build and strengthen evaluative capacity among program implementation staff, service delivery organisations and community stakeholders?***

***What impediments are there to improving evaluative culture, capability and capacity and what can be done to address these?***

The issues relating to evaluative culture, capability and capacity in the Australian Public Service and what can be done to improve these were addressed by the AES in its submission to the *Independent Review of the APS and Review of the Public Governance, Performance and Accountability Act 2013 and Rule*. (See pages 19-22 above).

We acknowledge that different organisations, both within and outside of the APS, are at different levels of maturity in relation to evaluation, and the impediments to improving evaluative culture, capability and capacity is also likely to vary.

## **KEY ENABLING MECHANISMS FOR EFFECTIVE EVALUATION**

### ***What supporting features and arrangements are important for the successful implementation and operation of a principles-based Indigenous evaluation framework and accompanying list of evaluation priorities?***

An enabling environment for effective evaluation is a crucial element for the successful implementation and operation of a principles-based Indigenous evaluation framework and identifying evaluation priorities.

The 2nd Submission of the AES to the *Independent Review of the APS* noted the need for an 'enabling environment' for performance.

Additionally, the Review of the PGPA and Rule found:

*“The tone is set at the top. The Joint Committee of Public Accounts and Audit, successive Auditors-General and Finance have all observed that strong and sustained leadership on improving performance monitoring, reporting and evaluation regimes is needed to improve performance reporting in entities.” (page 13).*

As noted previously, the Secretaries Board should take a prominent role in realising the intent of the PGPA Act 2013, and actively supporting the practical implementation of the associated enhanced Commonwealth Performance Framework. They provide the foundation for an authorising environment for evaluation and other performance activities. Such an authorising environment would:

- support continuous improvements to performance monitoring and reporting, such as information and metrics that meaningfully inform the public about outcomes and drive lasting change.
- clearly signal performance as a priority and so help embed a serious commitment (including for resourcing) to strengthening monitoring and evaluation within and across the APS
- drive a focus on enhancing 'performance literacy' at all levels, and in the future across all professions, across the APS

Establishing central expectations for achieving outcomes would address some of the cultural issues identified in the ANZSOG paper<sup>4</sup>, and lead to stronger performance leadership at all

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<sup>4</sup> This refers to an associated discussion paper 'Evaluation and learning from failure and success' that was released with the 'Priorities for Change' report by the Independent Inquiry into the Australian Public Service.

SES levels. This would also benefit from clear messaging from the Secretaries Board down, signalling:

- the APS culture should be inclusive of, and reward curiosity and experimentation
- the APS culture should be resilient in recognising that performance measurement activities (such as evaluation) will from time-to-time provide 'uncomfortable truths',
- the APS culture should meet challenges with a transparent, learning and improvement response, rather than risk aversion, blame or compliance response.

## Part C. Engaging with community and experts to fulfil the terms of the Letter of Direction

### Introduction

The Productivity Commission has been requested to develop a whole-of-government evaluation strategy (the Strategy) for policies and programs affecting Indigenous Australians, to be used by all Australian Government agencies. The Commission will also review the performance of agencies against the strategy over time, focusing on potential improvements and lessons that may have broader application for all governments.

For more than decade, the Productivity Commission has played a significant role in better understanding the issues associated with improving the outcomes from public expenditure on Indigenous Australians. This includes the annual production of the *Overcoming Indigenous Disadvantage Framework* since 2003 and the *Indigenous Expenditure Report* since 2007.

### Elements of good practice in developing an Indigenous Evaluation Strategy

There are four elements of good practice that we would like to present to the Commission. Alignment with these four elements would increase the likelihood of an efficient and effective a whole of government evaluation strategy for Australian Government expenditure for Indigenous policies and programs.

First, the Productivity Commission's current task should itself be viewed as an evaluation project involving Australian Government public expenditure on Indigenous Australians. Under this view, the project should therefore comply with the cultural ethical evaluation standards enunciated in the Department of Prime Minister Cabinet's *Indigenous Advancement Strategy Evaluation Framework*, which commenced in 2018. This would include seeking endorsement from the Research Ethics Committee at the Australian Institute of Aboriginal and Torres Strait Islander Studies. It would be an unprecedented approach to the development of national central administration policy. The potential learning from adopting such an approach for how government can ensure ethical evaluation in Indigenous contexts would be transferable to the development of other national policies of this nature.

Second, in evaluation terms, it would be beneficial if the Productivity Commission clearly stipulates that it is tasked with the development of an evaluation strategy *and* an evaluation plan. This is our reading of the first paragraph in the Letter of Direction. It would be beneficial because there is a well of knowledge available about what would be entailed in developing a good evaluation strategy and a good evaluation plan, particularly in the Indigenous contexts. Further, the objectives of the Evaluation Plan should involve both learning and accountability functions. The terms in the Letter of Direction do not refer to the accountability functions that could be served through the proposed evaluation strategy and plan.

Third, the Productivity Commission should ensure the development of a formal government-community partnership to fulfil the terms in the Letter of Direction. See below for some guidance on what this might entail.

Fourth, the Productivity Commission should ensure the development of a formal agreement with all the relevant agencies to fulfil the terms in the Letter of Direction. See below for some guidance on what this might entail.

Aligning the Productivity Commission's project with these four elements would be in accordance with the statutory functions of the Productivity Commission, in particular section 6 (f) of the *Productivity Commission Act 1998* which states:

*... to promote public understanding of matters relating to industry, industry development and productivity ...*

In this case, the Productivity Commission has an opportunity to implement this project in a manner that promotes public understanding about good practice public administration of public expenditure on Indigenous Australians. It is our submission that alignment with these four elements would increase the likelihood of an efficient and effective a whole of government evaluation strategy and plan for Indigenous-related Australian Government expenditure.

**Good practice standards for a government-community partnership and a whole of government approach to Indigenous public expenditure**

Recent research for a PhD thesis by Dolman 2017<sup>5</sup> identified a set of key characteristics if a government-community partnership was successfully implemented and another set of key characteristics that would be present if a whole-of-government approach was successfully implemented.

The Productivity Commission could draw upon this knowledge to assist in shaping the development of a whole of government evaluation strategy and plan for Indigenous-related Australian Government expenditure.

The PhD thesis also presents eight case study examples that demonstrate how to test whether each of the key characteristics can be achieved in metropolitan, regional and remote contexts. This practical experience can be used to help shape the processes for developing the proposed evaluation strategy and plan. For example, it will assist in:

- Identifying the key performance indicators
- Mapping the type of data to be collected
- Designing the data collection processes
- Complying with the cultural ethical evaluation standards enunciated in the IAS Evaluation Strategy.

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<sup>5</sup> Dolman, K (2017), *"Dismally poor returns to date": A review of the Indigenous affairs system*, PhD Thesis, Charles Darwin University, Darwin.

## Formal Government-Community Partnership

The Productivity Commission could draw some guidance from a set of key characteristics for government and community partnerships presented by Dolman 2017. The key characteristics were drawn from the literature about 'good practice' public administration and Indigenous affairs policy settings, particularly the work of Emeritus Professor Meredith Edwards and the late Dr Bill Jonas, former Aboriginal and Torres Strait Islander Social Justice Commissioner.

The 12 key characteristics for government and community partnerships are:

1. **Right partners** - Government and Indigenous partners are representative and empowered to fulfil the role
2. **Partnership agreement** - Comprehensive, detailed and signed
3. **Joint steering committee** - Comprised of senior representatives of each partner
4. **Steering committee authority** – the Committee possesses authority vertically and horizontally in each partner’s respective domain to implement the partnership agreement
5. **Respect for each partners’ values** – Indigenous values and public sector standards
6. **Trust and collaboration** - Nurturing of trust and collaboration including partnership skills training to develop a common understanding of the partnership theory, that is, how the partnership should operate to produce the desired outcomes
7. **Protocols for shared power** - between governments and Indigenous representatives for policy, implementation and evaluation of the trial, with a “paradigm shift” from the traditional policy-cycle model. The degree of Indigenous power should equate to: “full and effective participation in decisions affecting funding distribution and service delivery” and “genuinely involved” in making the necessary judgements
8. **Shared objectives and shared outcomes** – a common agenda of shared objectives and desired outcomes
9. **Role clarity and early planning**
10. **Sustained operation and membership** – the Steering committee is sustained for the duration of the trial with minimal changes in personnel
11. **Shared responsibility for expenditure** - Shared responsibility for the whole-of-government financial expenditure in the trial region for the duration of the trial, such as a block-funding arrangement that accumulates funds from multiple sources
12. **Full access to information** - for policy, planning, implementation, monitoring and evaluation decisions

## Formal Whole of Government Agreement

The Productivity Commission may also wish to draw some guidance from a set of key characteristics for government and community partnerships presented by Dolman 2017. The set of 12 key characteristics for whole of government coordination were drawn primarily from a Performance Audit conducted in 2007 by the Australian National Audit Office entitled *Whole of Government Indigenous Service Delivery Arrangements*. This was supplemented with knowledge from other literature for example, the Auditor-General's report does not refer to the key characteristic of trust, but it is included in this set.

The Auditor-General's Performance Audit is particularly valuable because it is specifically focused on whole-of-government coordination in Indigenous affairs policy.

The 12 key characteristics for whole of government coordination are:

1. **Lead agency** appointed
2. **Framework agreement** – a formal and signed off arrangement involving all government agencies servicing the region
3. **Joint steering committee** - such as an interdepartmental committee, taskforce or joint working party and resourcing administrative support
4. **Implementation plan** - developed under lead agency authority that is jointly agreed, overarching and high-level, and includes a description of the role and responsibilities of the lead agency and all other parties to the agreement. It should provide for “a strategically sequenced developmental process (one that provides a momentum for deepening cooperation, not merely achieving current output or outcome targets)”
5. **Mapping whole-of-government expenditure** – to provide a comprehensive financial picture of all projected Commonwealth, State/Territory and Local Government Indigenous expenditure in the region
6. **Protocols and dispute resolution processes** – that are suitable to operationalise WOGC including flexibility in program administration to respond to agreed priorities with a mechanism to overcome administrative barriers as they arise, for example through a dispute resolution process.
7. **Realistic timeframes** - with measurable milestones
8. **Risk assessment** – an overarching risk assessment of implementing WOGC to ensure: a common understanding of the risks of shared implementation; assurance of all agencies' capability to manage the key risks; an agreement that clearly identifies who carries which risks, including those that are shared; and lessons from previous experience. Key risks include relying on existing accountability arrangements, which were designed for departments working independently; a lack of appreciation, skills and culture to support whole-of-government working; and rigid funding arrangements and programme guidelines.
9. **Trust and collaboration** - ensuring a commitment to collaborative and trustful relationships across the government departments and with the Indigenous representatives including use of incentives
10. **Skills Training** - Ensuring staff possess the skills and attributes for collaborative working

11. **Performance Monitoring** - A purpose-specific performance monitoring system for producing and sharing robust monitoring information about operational performance, financial performance and compliance with the trial site objectives
12. **Baseline data** - benchmarks for monitoring and evaluation to assess success, progress or failure

For example, the guidance suggests the Productivity Commission give consideration of the risks of following developing and implementing a whole of government evaluation strategy and plan that excludes attention to the Indigenous expenditure by States and Territories, and Local Governments.

There is a need to conduct a risk analysis of the implications for the validity of the conclusions about the lessons and accountability that can be drawn from a whole of government evaluation strategy that excludes State, Territory and Local Government Indigenous expenditure.

## Conclusion

The AES again thanks the Productivity Commission for the opportunity to lodge a submission. The breadth and depth of the issues needing to be considered is extensive, and the Commission is to be commended for its work to date, including how well these have been scoped in the Issue Paper.

As noted earlier in the submission, given this depth and breadth this submission is an initial response and the AES is available to provide further advice and support to the Commission's work if required.