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A Culturally Adaptive Approach to First Nations evaluation consulting

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Abstract

Cultural safety is of utmost concern across the evaluation world, particularly given the way that evaluation and research have historically been implicated in colonising practices of the West. This article aims to examine the meaning of cultural safety in the context of an Aboriginal majority-owned consulting organisation that provides evaluation services to organisations where First Nations governance systems and processes may be unknown. This is a critically reflexive article that considers how the dual aims of contributing to self-determination and building First Nations business capacity may be managed in such evaluation projects. We apply Duke et al.'s Culturally Adaptive Governance Framework to our own evaluation work in striving for evaluations to be experienced as culturally safe by Aboriginal and Torres Strait Islander stakeholders and for evaluation outcomes to be relevant and useful from the perspective of both Aboriginal and Torres Strait Islander stakeholders and our clients. We then reflect on the implications for the evaluation, social policy and for First Nations business sectors.

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Introduction

The failure of evaluation to serve the interests of Aboriginal and Torres Strait Islander people is well documented (McCausland, 2019). Two key reports by the Productivity Commission (2016) and the Australian National Audit Office (2017) highlighted the Commonwealth Government's lack of progress in addressing disadvantage experienced by Aboriginal and Torres Strait Islander people and recommended more extensive and rigorous evaluation of First Nations programmes. Significant investment has since been allocated, including the Liberal government's announcement of $40 million in the 2017–18 budget to evaluate First Nations programmes delivered by the Australian Government. First Nations health, education and other outcomes measured through indicators such as the Closing the Gap targets, however, demonstrates ongoing lack of progress. Some proposed reasons for government evaluations not serving Aboriginal and Torres Strait Islander people well include the politically charged nature of evaluations (Altman & Russell, 2012), ill-defined and contradictory policy initiatives (Cobb-Clark, 2013), an absence of links between theory, data and policy initiatives (Pholi et al., 2009) and that definitions of 'success' in First Nations policy frameworks exclude Aboriginal and Torres Strait Islander ways of being, doing and knowing (Street et al., 2022a).

Of course, how this issue is viewed depends upon the theoretical lens one takes to thinking about evaluation. A rationalist view to evaluation assumes that the outcomes of policy can be assessed in a neutral way by collecting and evaluating evidence about the success of policy (e.g., Bovens et al., 2008). Conversely, the constructivist view of evaluation emphasises the social nature of the policy evaluation process (e.g., Balloch & Taylor, 2005; Street et al., 2022b). We subscribe to the latter position and believe that whether 'objectivity' in evaluation is indeed possible is subject to contestation. We believe that policy outcomes reflect power relations and will be perceived differently by various stakeholders who view themselves as benefiting, or not benefiting, from policy initiatives (Marsh & McConnell, 2010; McConnell et al., 2020). We agree with Altman and Russell's (2012) idea that 'evaluation itself is not a tool for objectively measuring success or failure but rather forms a part of the policy process' (p. 3). This is particularly important in the evaluation of First Nations policy and programmes, as production of knowledge has historically been an act of colonisation that has advanced the interests of the West while misrepresenting and causing further oppression of Aboriginal and Torres Strait Islander people (Smith, 2021). The evaluation literature is increasingly recognising the centrality of First Nations evaluation processes, methods and paradigms for more effective evaluative thinking in this context (Mustonen & Feodoroff, 2018; Wehipeihana & McKegg, 2018). At the heart of this is ongoing aspirations for

self-determination and control over decision-making, for which governance is a critical factor (Walter & Russo Carroll, 2021).

This article aims to consider how organisational governance can contribute to power-conscious evaluation processes in the context of an Aboriginal majority-owned consulting organisation. We employ a framework that translates real world issues of ethics and power within organisational governance to do so (Duke et al., 2021). Application of the concept of cultural safety within evaluation elicits some of the philosophical tensions that arise for us, and we detail negotiation of these tensions by ensuring that decision-making processes are an enabler of cultural safety in this context.

Background

Several recent policy frameworks have attempted to remedy issues of power that are inherent within the policy process. The Productivity Commission's Indigenous Evaluation Strategy (2020) aims to improve the lives of Aboriginal and Torres Strait Islander people by having policy and programme decisions informed by high quality and relevant evidence. It holds an explicit focus on centring Aboriginal and Torres Strait Islander people, perspectives, priorities and knowledges in all stages of evaluation. The *Australian Evaluation Society First Nations Cultural Safety Framework* (2021) also provides guidance on how evaluations can be culturally safe in terms of processes and products. The definition of cultural safety according to this framework is when Aboriginal and Torres Strait Islander people do not experience racism in any form and when their:

- Presence is welcomed and respected
- Experiences are believed and validated
- Cultures are centred and valued
- Knowledges and skills are recognised and supported
- Advice is listened to and acted upon (Gollan & Stacey, 2021).

Cultural safety is a crucial component of evaluation of First Nations programmes as it acknowledges the intergenerational nature of trauma, the historical and ongoing impacts of colonisation and the pervasive nature of white privilege (Gollan & Stacey, 2021). There has been increasing focus on cultural safety in this setting to reorient attention towards service provider responses and away from Aboriginal and Torres Strait Islander people, who have been subjected to ongoing trauma and systemic racism (Herring et al., 2013). Strengthening cultural safety in evaluation is critical for ensuring that such practices do not continue and that Aboriginal and Torres Strait Islander people are involved in key decisions on matters that affect their lives. For example, an evaluation of mental health programme in the Northern Territory (NT) demonstrated that cultural safety, put succinctly as 'our own ways of doing stuff' (p. 165), was the most important factor contributing to outcomes achieved through the programme (Guenther et al., 2022). This has expanded to the broader policy setting (Mackean et al.,

2020), where culturally safe policy analysis that is based on concepts such as sovereignty and interface thinking offers opportunities for reconsidering relations between Aboriginal and Torres Strait Islander people and the settler state (Nakata & Maddison, 2019).

We wish to highlight that culturally responsive evaluation (CRE) is an emerging body of theory that is relevant to considering culturally safe evaluation practice (Aponte-Soto et al., 2014; Chouinard & Cram, 2020; Hood et al., 2015). We believe, however, that by focussing on evaluation practices, culturally responsive evaluation overlooks the importance of organisational governance as an enabling factor. Another relevant concept is Indigenous Data Sovereignty, which is based upon the right of Indigenous people to own and control the design, collection and use of evaluation data (Kukutai & Taylor, 2016; Walter et al., 2021).

We now return to unpacking the meaning of cultural safety in evaluation. Normalisation of the values, beliefs and standards of the dominant culture poses genuine risks to cultural safety in ways that often go unrecognised. This is because those in positions of privilege are unlikely to be aware of ways in which marginalised groups do not have access to the benefits they receive as they have not experienced it (Pease, 2010). Cultural safety, then, requires experiential decision-making processes across all stages of evaluation design, data collection, analysis and use – in other words, governance. First Nations governance refers to Aboriginal and Torres Strait Islander people having a say in matters that affect them (AIATSIS, 2020). As we see it, cultural safety can only be achieved in its truest form when appropriate First Nations governance is in place.

While the Australian Evaluation Society framework outlines principles that support culturally safe evaluation, in the consulting world, we do not always know whether our clients have appropriate First Nations governance mechanisms in place. Furthermore, the values, beliefs and standards of the dominant culture are so embedded within ways of governing – that is, in systems, policies and programmes – that they are seen as 'normal' and are therefore often invisible (Lopez, 2003). In evaluation, this can play out in terms of the language that is used, the questions that are asked, the methodologies employed and the findings that emerge. For example, for a majority of the past two decades, First Nations policy evaluation has been largely measured according to a narrow range of health, education and other 'outcomes', which compounds framing of policy issues from a deficit viewpoint. Aboriginal and Torres Strait Islander people are blamed for their lack of ability to 'catch up' to non-Indigenous people. As a result, the system is absolved of responsibility in providing culturally safe policies and programmes. Increasing First Nations control over evaluations can change this narrative by ensuring they reflect equitable, holistic, community-focused goals and processes that better serve Aboriginal and Torres Strait Islander peoples' interests.

We want to be able to support our clients to learn and adhere to Australian Evaluation Society's principles for culturally safe evaluation so that they may contribute to self-determination and/or be effective allies (Land, 2015). We also want to make progress towards our own strategic goals. Duke's notion of culturally adaptive

governance (2021) offers a framework for combining contemporary First Nations cultures, values, traditions and aspirations for self-determination with existing governance structures of the Australian state. In this article, we apply these principles to our work in evaluation to consider how culturally adaptive evaluation may offer a solution for supporting Aboriginal and Torres Strait Islander self-determination and effective allyship within the realm of what is inside of our control as a consulting firm. Our goal is for evaluations to be experienced as culturally safe by Aboriginal and Torres Strait Islander stakeholders and for evaluation outcomes to be relevant and useful from the perspective of both Aboriginal and Torres Strait Islander stakeholders and our clients. The aim of this article is to understand how Aboriginal and Torres Strait Islander control can be increased through our evaluation consulting work while ensuring that our professional relationships are maintained and that we contribute to First Nations business development.

We write this critically reflexive article from the experiences of staff of a majority Aboriginal-owned consultancy organisation who provide evaluation services to a range of government and non-government organisations. While we acknowledge the risks of an all-encompassing focus on economic development to the detriment of other sociocultural agendas (Street et al., 2022a), First Nations business undoubtably provides opportunities for increasing the economic prosperity of Aboriginal and Torres Strait Islander people and communities (Miller, 1985). Our purpose as an organisation is to contribute to increase self-determination, equity and prosperity for Aboriginal and Torres Strait Islander people and all Australians. We see evaluations that are led, informed and governed by Aboriginal and Torres Strait Islander people as an important component of achieving our purpose.

This article will firstly describe the Culturally Adaptive Governance Framework (Duke et al., 2021). Secondly, we outline our culturally adaptive approach to evaluation. Thirdly, we explain in detail what culturally adaptive evaluation looks like in our organisation according to the three defining attributes of the Culturally Adaptive Governance Framework as defined by Duke et al. (2021). Finally, we summarise implications for those working in evaluation of First Nations policies and programmes and reflect on lessons for future policy development.

In this article, we respectfully use the terms 'Indigenous', 'First Nations' and 'Aboriginal and Torres Strait Islander' interchangeably. 'First Nations' is used in reference to First Nations evaluation, governance, policy and business. 'Aboriginal and Torres Strait Islander' is used in reference to Aboriginal and Torres Strait Islander people broadly. 'Aboriginal' is used in reference to Curijo staff members, as we currently do not employ any staff who identify as Torres Strait Islander. 'Indigenous' is used to mirror language used in relevant references and in some circumstances with reference to Indigenous people or methodologies globally. We also use the terms 'Indigenous' and 'Western' or 'mainstream', acknowledging these words have been used in ways that simplify diversity of knowledges and cultures that exist (Smith, 2021). They are used here to distinguish between certain differences in cultural and intellectual traditions of the two groups.

Aims, Positionality and Methodology

This article aimed to explore the meaning of cultural safety in the context of an Aboriginal majority-owned consulting organisation that provides evaluation services to organisations where First Nations governance systems and processes may be unknown. The questions used to guide the analysis were:

1. What does cultural safety in evaluation look like in a First Nations consulting business?
2. How can organisational governance support cultural safety in evaluation in a First Nations consulting business?
3. How can these ideas be applied beyond a First Nations business setting?

The first author of this article is a non-Indigenous woman with 10 years' experience working in First Nations policy and programme evaluation. The second author is an Aboriginal woman who identifies with the Worimi, Wailwan, Barkindji and Wiradjuri Peoples and has extensive experience within the child and family safety, healing and wellbeing, leadership and community sectors. The third author is an Aboriginal woman who identifies with the Wiradjuri and Ngunnawal Peoples of NSW and ACT with extensive management experience within the employment, welfare and community services sectors and adult education and trauma recovery. The fourth author is an Aboriginal woman whose links are to the Wonnarua Peoples, and who has been involved in several evaluations as an Aboriginal Consultant. The fifth author is a non-Indigenous man who has 30 years' experience in finance, accounting, assurance and evaluation.

The analytical approach involves the first author reflecting on her experiences while establishing a new research, monitoring and evaluation practice to build on the work already being done within the organisation. The Culturally Adaptive Governance Framework, explained in the next section, was considered according to each of its three defining attributes. Examples of how the organisational environment aligned to each of these defining attributes were put forward by co-authors as the emerging ideas were documented within the narrative contained within this article. The article also includes reflections that have iteratively occurred between co-authors as they have discussed and negotiated emerging tensions that are documented throughout.

We now explain the Culturally Adaptive Governance Framework and its relevance to considering cultural safety in evaluation.

Duke and Burchill's Culturally Adaptive Governance Framework

Historical research has conceptualised Aboriginal and Torres Strait Islander knowledge and culture as static and homogeneous, which has limited the potential of these knowledges and cultures to contribute to emancipatory imperatives (Nakata et al.,

2012). Duke et al. (2021) highlight the consequences of this in research and governance including maintenance of power imbalances and ongoing inequity. In response, they acknowledge traditional governance systems but define First Nations governance as 'a reflection of Indigenous culture, values and traditions expressed as a desire for contemporary self-determination and a need to interface this with broader governance structures of the (Australian) state' (p. 4). Aboriginal and Torres Strait Islander peoples' concepts of governance, they state, has been shaped by experiences of colonisation and ongoing struggles for self-determination. They put forth the concepts of adaptive governance and critical allyship as the theoretical basis of culturally adaptive governance, which creates conditions for effective First Nations governance in research. As they describe it, culturally adaptive governance empowers principles of self-determination throughout research systems and processes. It is comprised of three defining attributes:

1. Invest in community priorities and Indigenous leadership capacity
2. Effect purposeful collaboration between Indigenous knowledge systems and Western scientific traditions
3. Foster goodwill and meaningful connections

The defining attributes of the Culturally Adaptive Governance Framework are underpinned by Aboriginal and Torres Strait Islander peoples' aspirations to reclaim authority over how narratives and discourses represent their cultures, values and realities. They reflect the need of First Nations governance to work pragmatically and effectively with existing institutional governance. They also emphasise that good First Nations governance ensures that Aboriginal and Torres Strait Islander people and community have genuine decision-making power over matters that affect them. Finally, they allow for bridging the gaps in the philosophical tensions that emerge from the conflicting values, ethics and logic of research projects when institutional policies conflict with community expectations. These tensions are a result of the underpinning assumptions and biases within Western governance approaches that may coincide and contest with Aboriginal and Torres Strait Islander values and norms at the same time (Olsen, 2018). The Culturally Adaptive Governance Framework is well suited to the evaluation context as it acknowledges the complexity of contemporary and dynamic First Nations policy and programme environments.

Culturally Adaptive Evaluation

We take a pragmatic approach to evaluation by acknowledging the interface between traditional and contemporary Aboriginal and Torres Strait Islander cultures, values and traditions, and the existing governance structures of the Australian state. This is what we define as culturally adaptive evaluation.

Culturally adaptive evaluation acknowledges that cultural safety may not be inherent in evaluation projects that we are applying to carry out. This is because:

- Commissioning organisations are often held to meeting certain requirements in terms of timeframes, meaning there may be limits to involvement by Aboriginal and Torres Strait Islander people in the design of evaluation tenders and frameworks.
- There may be limited or inappropriate First Nations governance that oversees evaluation contracts due to leadership decisions or other socio-historical factors.
- There may be a lack of appropriate or experienced staff in commissioning organisations, for example, a lack of Aboriginal and Torres Strait Islander staff or lack of theoretical or practical knowledge/experience of how to do First Nations evaluation in a culturally safe way.
- Commissioning organisations may think they are working in a culturally safe way but be blind to the privileges they experience.

As a consulting firm, we have put in place certain systems and processes to play our own part in Aboriginal and Torres Strait Islander self-determination and being effective allies, while supporting our clients to do the same.

Culturally Adaptive Evaluation in practice

We now demonstrate what our culturally adaptive evaluation approach looks like in practice according to the three defining attributes that are outlined in Duke and Burchill's Culturally Adaptive Governance Framework.

Invest in Community Priorities and Indigenous Leadership Capacity

To fulfil our commitment to investing in community priorities, we have established an opportunity qualification form for potential business opportunities that allows us to ensure cultural accountability and assess cultural risks. Our assessment matrix provides guidance for scoring according to whether a business opportunity aligns to our strategic priorities in being accountable to Aboriginal and Torres Strait Islander communities, and for whether our reputation or relationships with community stakeholders may be placed at risk by the proposed evaluation work. Crucially, we make sure that evaluation projects support community priorities by considering what questions the evaluations seek to answer, and if they are conducted in a way that will be useful and relevant to Aboriginal and Torres Strait Islander people and communities. The most common issue that we have found that conflicts with community priorities is when a proposed evaluation scope does not allow adequate time for a meaningful evaluation process to occur (McCausland, 2019). In this sense, the right of communities to have genuine input into determining the value of a policy or programme is overlooked, regardless of what is being evaluated. Insufficient funding allocation is another example of where we are able to identify that an evaluation project will not align to the priorities of Aboriginal and Torres Strait Islander people and communities.

It goes without saying that our internal governance structure is critical to building Indigenous leadership capacity. We have an Aboriginal Chief Executive Officer who has ultimate decision-making authority, supported by an Executive Board that consists of two out of three members who are Aboriginal with the Chairperson being an Aboriginal person. This ensures there is Aboriginal input into all key decisions. We also continually seek opportunities to build capacity of Aboriginal (and all) staff in evaluation to contribute to increased Aboriginal and Torres Strait Islander knowledges and perspectives filtering through the field of evaluation.

Effect Purposeful Collaboration Between Indigenous Knowledge Systems and Western Scientific Traditions

To effect purposeful collaboration, we engage in processes of negotiation that focus on Aboriginal and Torres Strait Islander lived experiences but not excluding Western forms of knowledge. For example, we follow what is termed the 'two-way learning' philosophy (Harrison et al., 2019; Ober, 2009). We acknowledge that 'Indigenous' and 'Western' knowledges are not mutually exclusive, and that there have been various methodological and theoretical positions put forth by First Nations scholars, summarised well by Olsen (2018). While our approach has been considered within the policy setting (Mackean et al., 2020; Street et al., 2022b), to our knowledge, it has not been theorised within a First Nations business environment. We apply this thinking to evaluation concepts in culturally adaptive ways. For example:

- We believe that **rigour** is achieved through sound research and evaluation methodologies, transparency in positionality and incorporation (or acknowledgement) of Indigenous methodologies.
- We ensure that **relevance** should be determined from the perspective of Aboriginal and Torres Strait Islander people when they are affected by a policy or programme.

An example of use of Aboriginal and Torres Strait Islander knowledge systems in the context of Western scientific traditions is our Songlines approach to evaluation. This approach is based on the journey of our ancestral spirits as they created the land, animals and lore. Songlines are integral to Aboriginal and Torres Strait Islander people, spirituality and connection as they provide knowledge, cultural values and significant wisdom. They are dance, songs, art and stories of the Dreamtime that are handed down through families and communities that relate to Country. Songlines can be about creation stories and they can also be about contemporary stories. We work with stakeholders and consider the historical and current socio-political context to create a contemporary and unique Songline that tells an evaluation story. This is done by capturing the voices, experiences and knowledges of stakeholders of the relevant policy or programme and incorporating stories from the past which are transformed into a shared vision for the future. Our Songlines approach to evaluation was developed by

Aboriginal leaders within the organisation as a way of interpreting and expressing cycles of monitoring, evaluation and learning in a way that makes sense to Aboriginal staff and stakeholders through a cultural lens.

We hold ourselves to account by seeking feedback from internal and external stakeholders about their perceptions of cultural safety of our services. This is done through an internal staff survey and an evaluation survey for completed projects with clients. We hold others to account by ensuring that our cultural expertise is respected and valued, and by challenging racism that we may observe in ways that may be covert or overt (Delgado & Stefancic, 2017). We adhere to the concept of critical allyship by acknowledging complex and intersecting experiences of privilege that shape how we work (Crenshaw, 1993). This is done by incorporating perspectives of different social identities such as gender and age into our staffing structure. We also establish transparency in positionality to our clients, by increasing awareness of the way that lived experiences of racism are crucial to the work that we do.

Finally, we reflect carefully on the way that all staff within the organisation – non-Indigenous, Aboriginal or otherwise – have been influenced by colonial structures that shape our thinking (Pohlhaus, 2002). This enables us to simultaneously value and critique all perspectives, while negotiating ways forward that allow our Aboriginal leaders and staff to assert their interests (Nakata et al., 2012). For example, we have debated the ethical issues associated with being contracted by mining companies to support their aspirations to operate in ways that advance the interests of Aboriginal and Torres Strait Islander people. We respect and support individual staff members experiences and work through ethical dilemmas to explore project involvement; however, we also believe that it is our responsibility to take a leadership role to educate and contribute to broader change through such opportunities.

Foster Goodwill and Meaningful Connections

We live our values that are underpinned by Aboriginal and Torres Strait Islander priorities and knowledges. Indeed, our name means ‘family’ and we seek connections through working with a foundation of trust amongst staff and with our clients. Each project considers the significance of local histories and cultures, and we ensure adequate time and flexibility is embedded in evaluation processes. If it is not possible to allow for adequate time for proper community consultation, we will not proceed with a project. We maintain strict focus on strength-based language and approaches for our work to develop our business internally as well as for individual projects. All staff complete our Cultural Learning Journey training that explores trauma-informed approaches and communication to ensure that healing and wellbeing are kept at the forefront of our work.

Our Cultural Framework, currently being collaboratively developed by all staff, specifies the values and behaviours that are expected of our workforce in order to operate in culturally safe ways. The Cultural Framework has an explicit focus on values, trust and relationships, strengths, our two-way learning philosophy,

understanding of local histories, and celebrating cultural diversity, collaboration and sustainability. Working according to this framework ensures that we apply a cultural lens to all of our work. This involves providing honest feedback to our partners about the language they use, the questions they ask, the methodology they follow and how they interpret findings. The feedback we provide focuses on Aboriginal and Torres Strait Islander self-determination expressed through meaningful evaluation systems and processes as the primary goal.

By no means does this article excuse or forgive the systematic erasure of Aboriginal and Torres Strait Islander languages and cultures and the trauma and pain of ongoing marginalisation for generations of Aboriginal and Torres Strait Islander people. The effects of colonisation remain with us today and continue to cause abysmal health and wellbeing outcomes, subjugation of Aboriginal and Torres Strait Islander knowledges through colonial education structures and high rates of incarceration amongst many other detrimental impacts to individuals and communities. What it does do, is consider how practices of evaluation, and First Nations business more broadly, can support Aboriginal and Torres Strait Islander self-determination through applying a pragmatic framework that translates real world issues of ethics and governance.

We will now consider some implications from the Culturally Adaptive Governance Framework and our reflections above for the evaluation, social policy and business sectors.

Implications for Evaluation and Social Policy

As has been described above, the increasing focus on cultural safety across social services is one that is critical. Yet, we encourage careful application of this term. In recent times, there has been more concerted effort to ensure that Aboriginal and Torres Strait Islander perspectives, priorities and knowledges need to inform policy frameworks, including their evaluations. An example is seen in the development of the Partnership Agreement on Closing the Gap between the Commonwealth and state and territory governments, the Coalition of Aboriginal and Torres Strait Islander Peak Organisations and the Australian Local Government Association (Coalition of Peaks, 2020). Progress can be slow, however, and our experience tells us that there are still people within government and other organisations who do not yet understand what true self-determination looks like in practice.

We encourage evaluation and other social policy consultants and commissioning organisations to avoid all-encompassing claims of cultural safety when appropriate First Nations governance is not in place. While there are many differing definitions of cultural safety in this context, our perspective is that cultural safety should relate to the experiences of Aboriginal and Torres Strait Islander people (CATSINaM, 2017; Walker et al., 2014). Cultural safety may not necessarily be present in evaluation projects unless appropriate First Nations decision-making systems and processes are in place. This includes Aboriginal and Torres Strait Islander staffing, leadership and/or governance such as a First Nations governance group who have provided input in the design of an

evaluation scoping process. To some extent, we cannot know that evaluation projects are culturally safe unless we are conducting culturally safe evaluations of the cultural safety of evaluations! We believe that working in a culturally adaptive way is a pragmatic approach to ensuring that we use appropriate language. It also helps us to avoid (or minimise – where certain practices are outside of our control) reproduction of injustices of the past by unlearning deeply embedded ways of thinking, which are taken up by Aboriginal and Torres Strait Islander and non-Indigenous people alike (Pohlhaus, 2002). Furthermore, we posit that recentering the perspectives of culturally and linguistically diverse groups would assist to disrupt the status quo where power is maintained by those of the dominant culture. This should be an aspiration across all social policy. While a detailed discussion about this is outside the scope of this article, further research is warranted to reflect upon this in a broader sense.

We hope that the systems and processes that we have outlined according to the Culturally Adaptive Governance Framework above may be useful to others working in First Nations evaluation and social policy. We note that other models such as that proposed by Bowman (2020) are available for considering First Nations governance for evaluation but have found the Culturally Adaptive Governance Framework to be more useful in an organisational setting. The design, implementation and reporting of evaluations and social policy projects should affirm Aboriginal and Torres Strait Islander sovereignty and the rights of others who have been marginalised within existing colonial structures through truth-telling about injustices of the past and present (Duke et al., 2021). We encourage all working in this context to accept responsibility to continually learn about their own complicity within colonial structures and consider ways that they might be able to adopt a culturally adaptive way of working in their own practice.

A culturally adaptive approach to evaluation and social policy allows for small yet significant changes to systems and processes that support First Nations decision-making and control to increase the extent to which Aboriginal and Torres Strait Islander lived experiences of inequity and racism inform all stages of evaluation. While many of the strategies we have outlined are not new, considering cultural safety within the complex power relationship associated with the commissioning of evaluations in this space does provide new learnings. We now briefly reflect on implications for First Nations business more broadly.

Implications for First Nations Business

There will always be philosophical tensions for Aboriginal and Torres Strait Islander people to negotiate working between Indigenous and non-Indigenous positions (Nakata, 2007). In the business sector, this is especially so because of the demonstrated risks in a narrow focus on economic benefits of First Nations policy to the detriment of other community-focused, holistic benefits (Street et al., 2022a). The right to economic prosperity and self-determination for Aboriginal and Torres Strait Islander people through business development opportunities are highly significant to Aboriginal and

Torres Strait Islander futures. Yet, the need to maintain professional relationships with potential or existing clients who may or may not understand the meaning of cultural safety can pose risks to the cultural integrity of a First Nations business. There is an inherent ethical tension in calling out racist practices while maintaining positive and productive relationships with our clients so that we may contribute to grow the business. These 'push-pull' tensions at the cultural interface in the First Nations business sector are deserved of more research (Nakata, 2007 p. 12). Ultimately, we contend that it is essential to continually reflect on how these different positions play into the business decisions that are made and to always be conscious of the various impacts for Aboriginal and Torres Strait Islander people including the income generated, and relationships with community and reputation.

Conclusion

Our intention in this article was to understand how Aboriginal and Torres Strait Islander control can be increased through the evaluation consulting work of a majority-owned Aboriginal consulting firm while ensuring that we contribute to First Nations business development. We have revealed the complexity of applying the term 'cultural safety' in the First Nations evaluation consulting space and put forward Culturally Adaptive Governance Framework as a framework for leading culturally adaptive evaluation as a pragmatic solution to some of the challenges that may arise. In considering what cultural safety looks like in our work, other relevant fields of literature have provided useful ideas, particularly those which theorise cultural safety in policy and culturally responsive evaluation. Yet, we found the Culturally Adaptive Governance Framework was most relevant for understanding how culturally safe evaluation processes can translate to positive First Nations business outcomes through an explicit focus on organisational governance as an enabler of cultural safety rather than evaluation practice only. We now wish to consider the strengths and limitations of this framework in our approach to culturally adaptive evaluation.

The strengths of this framework include that it is a pragmatic approach to taking a power-conscious approach to organisational governance in evaluation of First Nations policies and programmes in a consulting setting. For us, cultural safety is achieved through ensuring that Aboriginal and Torres Strait Islander peoples' lived experiences of structural racism affect everything we do and organisational governance is key to this. It can also be applied beyond First Nations evaluation as it is underpinned by the idea of recentering the perspectives of culturally diverse groups to disrupt the ways that dominant cultures maintain control over minority groups (Solorzano & Bernal, 2001).

There are indeed limitations of this framework in this context. It ignores the principles of sovereignty and treaty considerations within a broader legislative context. It could be argued that the framework permits white fragility by the pragmatism of applying it within a Western governance setting. In our application of the Culturally Adaptive Governance Framework to culturally adaptive evaluation, we also believe that it could be strengthened by integrating the principles of Indigenous Data

Sovereignty. Specifically, culturally adaptive evaluation as described throughout this article should aim to reorient evaluation systems and processes towards ensuring that Indigenous people and communities who are involved in an evaluation maintain control over the design, collection and use of evaluation data. This would necessitate consideration of how evaluation designs involve those affected by a programme or policy in key decisions from the very initial stages of planning right through to completion.

To summarise, we have demonstrated that a number of philosophical tensions arise in this space and that it is essential to continually reflect on impacts for business as well as impacts for community as a result of decisions that are made. Rather than avoiding such discussions, which can cause significant discomfort and require much sensitivity and patience, we contend that engaging openly with these tensions can be productive to staff and to business. Our application of this thinking to the broader social policy and First Nations business sector warrants further exploration. While First Nations business is undoubtably an avenue for advancing Aboriginal and Torres Strait Islander futures, it must be considered carefully. We hope that our culturally adaptive approach to evaluation will be seen as useful to the First Nations evaluation, social policy and business sectors more broadly.

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