

The Improving School Enrolment and Attendance through Welfare Reform Measure

Department of the Prime Minister and Cabinet
Department of Human Services

© Commonwealth of Australia 2014

ISSN 1036-7632

ISBN 0 642 81494 5 (Print)

ISBN 0 642 81495 3 (Online)

Except for the content in this document supplied by third parties, the Australian National Audit Office logo, the Commonwealth Coat of Arms, and any material protected by a trade mark, this document is licensed by the Australian National Audit Office for use under the terms of a Creative Commons Attribution-NonCommercial-NoDerivatives 3.0 Australia licence. To view a copy of this licence, visit

<http://creativecommons.org/licenses/by-nc-nd/3.0/au/>.

You are free to copy and communicate the document in its current form for non-commercial purposes, as long as you attribute the document to the Australian National Audit Office and abide by the other licence terms. You may not alter or adapt the work in any way.

Permission to use material for which the copyright is owned by a third party must be sought from the relevant copyright owner. As far as practicable, such material will be clearly labelled.

For terms of use of the Commonwealth Coat of Arms, visit the *It's an Honour* website at <http://www.itsanhonour.gov.au/>.

Requests and inquiries concerning reproduction and rights should be addressed to:

Executive Director
Corporate Management Branch
Australian National Audit Office
19 National Circuit
BARTON ACT 2600

Or via email:

publications@anao.gov.au.





Canberra ACT
25 June 2014

Dear Mr President
Dear Madam Speaker

The Australian National Audit Office has undertaken an independent performance audit in the Department of the Prime Minister and Cabinet and the Department of Human Services titled *The Improving School Enrolment and Attendance through Welfare Reform Measure*. The audit was conducted in accordance with the authority contained in the *Auditor-General Act 1997*. I present the report of this audit to the Parliament.

Following its presentation and receipt, the report will be placed on the Australian National Audit Office's website—<http://www.anao.gov.au>.

Yours sincerely

A handwritten signature in black ink, appearing to read 'Ian McPhee', is positioned above the printed name and title.

Ian McPhee
Auditor-General

The Honourable the President of the Senate
The Honourable the Speaker of the House of Representatives
Parliament House
Canberra ACT

AUDITING FOR AUSTRALIA

The Auditor-General is head of the Australian National Audit Office (ANAO). The ANAO assists the Auditor-General to carry out his duties under the *Auditor-General Act 1997* to undertake performance audits, financial statement audits and assurance reviews of Commonwealth public sector bodies and to provide independent reports and advice for the Parliament, the Australian Government and the community. The aim is to improve Commonwealth public sector administration and accountability.

For further information contact:

**The Publications Manager
Australian National Audit Office
GPO Box 707
Canberra ACT 2601**

Phone: (02) 6203 7505

Fax: (02) 6203 7519

Email: publications@anao.gov.au

ANAO audit reports and information about the ANAO are available on our website:

<http://www.anao.gov.au>

Audit Team

Brendan Mason
Loretta Cheung
Edel Kairouz

Contents

Abbreviations.....	7
Glossary	8
Summary and Recommendations	11
Summary	13
Introduction	13
Audit objective and criteria	15
Overall conclusion.....	15
Key findings by chapter.....	17
Summary of agency responses	20
Recommendations	22
Audit Findings	23
1. The Improving School Enrolment and Attendance through Welfare Reform Measure	25
Introduction	25
The evolution of SEAM	26
How SEAM operates.....	30
Audit approach	34
2. Delivering SEAM—the Enrolment Element	36
Introduction	36
Identifying in-scope parents and their children	37
Obtaining enrolment information from schools and parents	38
Possible suspension of payments under the enrolment element	41
Conclusion	45
3. Delivering SEAM—the Attendance Element.....	46
Introduction	46
Identification of children with low school attendance	48
Delivering conference notices and scheduling conferences.....	54
Compulsory conferences and school attendance plans	55
Possible suspension of payments under the attendance element	56
Conclusion	61
4. Monitoring and Reporting on SEAM's Operation and Effectiveness	63
Introduction	63
Monitoring SEAM's implementation	63
External reporting on SEAM's performance	65
Measuring SEAM's performance	66
Conclusion	69

Appendices	71
Appendix 1: Agency responses	73
Appendix 2: Lessons learnt from the SEAM trial.....	81
Index.....	85
Series Titles.....	86
Better Practice Guides	92

Tables

Table 1.1:	Income support payments subject to SEAM	31
Table 1.2:	Northern Territory SEAM Communities.....	32
Table 2.1:	Total number of in-scope parents and children, 2013 (Phase One and Two communities).....	38
Table 2.2:	Number of SEAM activities under the enrolment element, as at the end of 2013 (Phase One and Two communities).....	41
Table 3.1:	Total number of parents and children potentially in-scope for attendance element, 2013 (Phase One and Two communities)	48
Table 3.2:	Number of SEAM activities under the attendance element, 2013 (Phase One and Two communities)	58

Figures

Figure 2.1:	Overview of the SEAM enrolment process.....	36
Figure 2.2:	Percentage of children for whom DHS had enrolment details, 2013 (Phase One and Two communities)	43
Figure 3.1:	Overview of the SEAM attendance process.....	46
Figure 3.2:	Numbers of compulsory conferences, compliance notices and payment suspensions, 2013 (Phase One and Two communities)	59
Figure 3.3:	The cumulative proportion of children actioned under the SEAM attendance element, 2013 (Phase One and Two communities)	60

Abbreviations

ANAO	The Australian National Audit Office
DEEWR	The former Department of Education, Employment and Workplace Relations. DEEWR's responsibility for administering SEAM was transferred to the Department of the Prime Minister and Cabinet in September 2013
DHS	The Department of Human Services. Prior to July 2011, responsibility for aspects of SEAM service delivery was administered by Centrelink (which now forms part of DHS)
ECED	The Northern Territory Government's <i>Every Child, Every Day</i> school attendance policy
FaHCSIA	The former Department of Families, Housing, Community Services and Indigenous Affairs
FTB	Family Tax Benefit
NT	Northern Territory
NT DoE	The Northern Territory Department of Education
PM&C	The Department of the Prime Minister and Cabinet
RSAS	Remote School Attendance Strategy
SATO	Senior Attendance and Truancy Officer
SEAM	The Improving School Enrolment and Attendance through Welfare Reform Measure
SFNT National Partnership	<i>The National Partnership Agreement on Stronger Futures in the Northern Territory</i>

Glossary

Attendance notice	A formal notice advising a parent or parents of the application of SEAM in their community, and outlining SEAM requirements and potential implications.
Bulk enrolment data collection	A process conducted by DHS to obtain enrolment details from the Northern Territory Department of Education.
Community information sessions	Public information sessions delivered by the relevant departments to communities affected by the implementation of SEAM.
Compliance notice	A formal notice issued to a parent or parents who have not complied with SEAM requirements.
Compulsory conference	A meeting between a Senior Attendance and Truancy Officer, parent and a Social Worker to discuss a child's school attendance and develop a school attendance plan.
Conference notice	A formal notice requiring a parent's presence at a compulsory conference.
Enrolment notice	A formal notice sent by DHS to a parent or parents to obtain their child's enrolment details.
In-scope	Refers to parents or children who fall within the participation requirements of SEAM.
Parents	References to parents in this report refer also to single parents and to carers or guardians who are responsible for the care of one or more school-aged children. For parents to be 'in-scope' for SEAM, they must also reside in one of the SEAM communities and receive certain income support payments.

Passive enrolment	A child is considered to be 'passively enrolled' where they have recorded at least 20 sequential unauthorised absences from school, and no notification has been received that the child was enrolled in another school.
Reasonable excuses/special circumstances	Provisions under legislation designed as a safeguard against unwarranted sanction of income support recipients through the suspension or cancellation of their payments when a circumstance directly and materially impacts on the ability of parents to ensure their children are enrolled at school.
Rollout	Refers to the implementation of SEAM, which is to occur in four distinct phases.
School attendance plan	A plan agreed to at a compulsory conference by a Senior Attendance and Truancy Officer and a parent, to improve a child's school attendance.
Senior Attendance and Truancy Officer	Senior Attendance and Truancy Officers work with parents and students to overcome barriers to school participation.
Unauthorised absence	An unauthorised absence is one where parents either fail to notify the school of the reason for the absence from school, or the reason provided is deemed unacceptable.

Summary and Recommendations

Summary

Introduction

1. Australia generally performs well in relation to school attendance. As the 2013 Council of Australian Governments (COAG) Reform Council report on five years of performance in education in Australia demonstrates, the vast majority of children regularly attend school.¹ However, the report noted that attendance levels of children in some areas lag behind the national average. In particular, the report highlighted the ‘large decreases’ in attendance levels of Indigenous secondary school students in the Northern Territory. Furthermore, the Australian Government Minister for Indigenous Affairs recently commented that ‘in the Northern Territory, only 13 per cent of kids are attending school 80 per cent of the time. This has to change.’²

2. Poor school attendance in the Northern Territory was highlighted in the 2007 *Little Children are Sacred* report. The Board of Inquiry into the Protection of Aboriginal Children from Sexual Abuse noted the: ‘miserable school attendance rates for Aboriginal children and the apparent complacency here (and elsewhere in Australia) with that situation’.³ In its response to the report, the then Government announced the Northern Territory Emergency Response which included a number of initiatives to improve school enrolment and attendance, such as improving school infrastructure and boosting teacher numbers.

3. In this context, and as part of the then Government’s broader initiatives to reform the welfare system⁴, the Australian Government announced the School Attendance and Enrolment Pilot in 2009. The Government’s intention was to trial the conditional linkage of school enrolment and attendance to welfare payments, so as to encourage better enrolment and attendance.

1 COAG Reform Council, *Education in Australia 2012: Five years of performance*, Sydney, COAG Reform Council, 2013, pp. 22 and 57.

2 Senator the Hon. N Scullion, (Minister for Indigenous Affairs), ‘Government unveils plan to get remote Indigenous children back to school’, media release, Parliament House, Canberra, 20 December 2013.

3 Northern Territory Government, Report of the Board of Inquiry into the Protection of Aboriginal Children from Sexual Abuse, *Ampe Akelyernemane Meke Mekarle* “Little Children are Sacred”, Northern Territory Government, Darwin, 2007, p. 18.

4 The Hon J Macklin, (former Minister for Families, Housing, Community Services and Indigenous Affairs), *Second Reading Speech House Debate Social Security and Veterans’ Entitlements Legislation Amendment (Schooling Requirements) Bill 2008*, House of Representatives, Canberra, 4 September 2008, p. 7207.

4. In 2013, following a three and a half year trial, the then Australian Government allocated funding of \$107.5 million over ten years under the *Stronger Futures in the Northern Territory* Budget measure to implement a revised model. The new model, entitled the Improving School Enrolment and Attendance through Welfare Reform Measure (SEAM), commenced in March 2013. SEAM is to be implemented in four phases covering 52 schools in 23 Northern Territory communities (SEAM communities), by 2015. While SEAM may apply to parents of any background, the SEAM communities all have a high proportion of residents who are Indigenous Australians.

5. SEAM applies to parents (in-scope parents) who: live in one of the SEAM communities; are responsible for the care of one or more school-age children; and receive certain income support payments. SEAM requires these parents, as a condition of their welfare payments, to make sure their children are enrolled in and attending school. SEAM offers social work support to help parents overcome barriers to school enrolment and attendance, and as a last resort, parents may have their welfare payments suspended for failing to take appropriate action.

How SEAM operates

6. The Department of Education, Employment and Workplace Relations (DEEWR) was originally responsible for the development of SEAM policy and overseeing SEAM's implementation. Following Machinery of Government changes in September 2013, these responsibilities were transferred to the Department of the Prime Minister and Cabinet (PM&C). The Department of Human Services (DHS) and the Northern Territory Department of Education (NT DoE) are jointly responsible for SEAM's day-to-day service delivery, and have been involved in the implementation of the measure since it commenced. The *Social Security (Administration) Act 1999* (the Act) provides the legislative basis for SEAM, including the provision of individual school enrolment and attendance information to the Australian Government.

7. SEAM has two elements, one related to ensuring school-age children are enrolled in school and the other designed to improve school attendance. The enrolment element involves collection of enrolment details of relevant school-age children. Welfare payments may be suspended if parents fail to provide information about their children's enrolment to DHS and do not have

a reasonable excuse for doing so. Under the attendance element, where a child is identified with low school attendance⁵ within a SEAM community, their parents⁶, will be required to participate in a compulsory conference to discuss the barriers to regular attendance, and agree to improve their child's attendance under a school attendance plan. If these requirements are not met, certain welfare payments may be suspended.

Audit objective and criteria

8. The objective of the audit was to assess the effectiveness of the administration of the Improving School Enrolment and Attendance through Welfare Reform Measure.

9. The audit examined the administration of SEAM by DEEWR (and after September 2013, PM&C) and DHS from its commencement in March 2013. To conclude on this objective, the ANAO examined whether the measure was effectively planned and implemented, including in accordance with relevant policy and legislative requirements; and whether effective monitoring, reporting and evaluation arrangements were established, including to support the continuous improvement of SEAM.

10. The audit also examined the program's development, to determine whether lessons from the trial were effectively applied in the design and implementation of SEAM.

Overall conclusion

11. Improved school engagement is seen as an important contribution to reducing areas of Indigenous disadvantage, including in literacy and numeracy levels and economic participation. The Improving School Enrolment and Attendance through Welfare Reform Measure is not necessarily confined to Indigenous parents and children; however the communities to which SEAM is applied all have a high proportion of residents who are Indigenous Australians.

12. Overall, the administration of SEAM has been mixed. The first two phases of SEAM have been implemented as scheduled in 15 communities and

5 The SEAM attendance process may be commenced only if the child records 10 or more unauthorised absences over the course of the previous ten weeks; equivalent to less than 80 per cent attendance.

6 In this report references to 'parents' also includes single parent situations.

37 schools—extending to more than 4500 children, with work underway to implement SEAM in other communities; and reasonable arrangements have been established to support collaboration between Australian Government and NT Government agencies. However, there remains scope to improve SEAM’s effectiveness through strengthening key aspects of service delivery and performance reporting arrangements.

13. To encourage parents to enrol their children in school, the enrolment element identifies parents (who live in SEAM communities and receive income support payments), and obtains enrolment details for their children. Nearly 2500 parents were identified as within the scope of SEAM in 2013 and enrolment details were obtained covering more than 90 percent of relevant children. Of these parents, around 10 per cent had payments temporarily suspended, but promptly restored, indicating that a significant proportion of the enrolment activity is simply requiring parents who had already enrolled their children to contact DHS. As a result, whether SEAM has stimulated an increase in underlying enrolment levels is not readily identifiable.

14. Encouraging children to regularly attend school in SEAM communities, many of which are in very remote locations, has long presented a challenge. During 2013 there were a large number of children identified who attended school less than 80 per cent of the time, which is the benchmark agreed by the Australian and NT governments. A structured approach to prioritising attendance activities has not been developed for SEAM and in 2013, attendance processes were undertaken for just one quarter of the parents of children with poor school attendance. There is scope to better manage the disparity between the number of children with low school attendance and SEAM’s capacity to focus on these children through developing a clearer approach to the targeting of SEAM resources including in relation to the contribution of other school attendance initiatives.

15. While an evaluation strategy was developed for the trial of SEAM, limited performance measures were established prior to the transfer of SEAM to the Department of Prime Minister and Cabinet (PM&C).⁷ This has constrained the ability of the department to assess SEAM’s effectiveness and identify areas to improve efficiency of delivery. It also constrains the

7 The Commonwealth Department of Education advised that the development of the performance reporting framework was delayed due to the redirection of resources to focus on program implementation.

department's ability to provide advice to government on the program's success, and to inform policy considerations. Ideally, performance measurement arrangements are developed at the commencement of an initiative to allow for the establishment of baseline information and consideration of performance information needs. SEAM is planned to be in operation until 2022 and in this context finalising a performance reporting approach with appropriate performance measures including proxy measures where necessary, would be a priority. The proposed evaluation of SEAM, which PM&C advised it intends to commence in 2014, would form a key element of this framework. The department has also advised that it has commenced work on an approved performance measurement approach.

16. In developing SEAM, the then Department of Education, Employment and Workplace Relations (DEEWR) and DHS had the advantage of being able to draw upon the experience of a three and a half year trial which was allocated funding of \$31.2 million. While these departments had resolved some issues which arose during the trial, many of the key issues identified in this audit were also identified under the trial. The continuing presence of these issues indicates that the opportunities to learn from the trial, and make improvements, were not fully realised.

17. The ANAO has made one recommendation directed towards PM&C strengthening SEAM's program implementation. The planned evaluation of SEAM in 2014 also offers an opportunity to examine elements of the SEAM's design and operation highlighted in this audit.

Key findings by chapter

Chapter 2: Delivering SEAM—the Enrolment Element

18. Reasonable arrangements have been developed to support collaboration and information sharing between responsible Australian and Northern Territory government agencies in respect to the identification of parents who fall within scope of SEAM, and to collect enrolment details for their children. The timeliness of the enrolment process has improved compared to the trial program that preceded SEAM, and in general DHS applied enrolment processes and payment decisions appropriately. Nonetheless, under current arrangements, if a child was not enrolled for school in term one, the SEAM enrolment process may not take action to encourage their enrolment until a week or two into the second term of the school year. This means that the child may have missed an entire term of school before

action is taken. In April 2014, PM&C advised the ANAO that it intended to commence consultations with NT DoE and DHS to identify possible options to expedite enrolment data collection, enabling enrolment data to be available earlier in the school term.

Chapter 3: Delivering SEAM—the Attendance Element

19. During 2013 an estimated 1300 children were identified as having low school attendance, and as their parents were within scope of SEAM, all of these children should have been afforded attention under the attendance element. However, attendance action—compulsory conferences and the development of school attendance plans—was only implemented for one quarter of these children (331). Noting that in the early stages of SEAM’s rollout, processes may not have yet reached full capacity, there are several factors that may have contributed to this low level.⁸ These include that the attendance processes required more time and effort than was originally envisaged and the resources to apply SEAM activities to all children who meet the criteria were not sufficient given the numbers of children and geographic distribution of communities. Of the 276 parents who were required to attend a compulsory conference in 2013, 127 were issued with one or more compliance notices, because: a conference was not attended; a school attendance plan was not agreed; and/or commitments agreed in a plan were not kept. During 2013, the payments of 60 parents were suspended for not complying with a compliance notice under the attendance element.

20. To seek to maximise and sustain SEAM’s impact, a clearer approach is needed to target SEAM resources. This approach should be informed by a sound understanding of SEAM’s current capacity, options to streamline attendance processes to increase capacity and consideration of SEAM’s relationship with other broader school attendance initiatives. Specifically, the issues of which cohorts of students (including by age or attendance levels) should be prioritised; and the appropriate timing and degree of contact

8 Early results in improving the numbers of parents and children subject to attendance processes are promising—NT DoE recorded that 162 compulsory conferences were conducted in the first school term in 2014. NT DoE advised that, in the context of very remote communities and a highly mobile population, it is important to recognise activity undertaken by SATOs in the lead up to conferences being held. This activity includes: liaising with schools to review case files; confirming a child’s identity; scope checks; validating attendance data; locating the family; and attempting to deliver compulsory conference notices. For example, NT DoE advised it had made 404 failed attempts to deliver notices in the first school term in 2014.

between Senior Attendance and Truancy Officers (SATO), Social Workers and parents, and the extent to which efforts are concentrated on specific communities with SEAM or spread more evenly across all communities, should be reviewed. PM&C advised in April 2014 that NT DoE and DHS had commenced negotiations for a service level agreement. While a service level agreement may address service delivery deficiencies, it is important that an overall strategy is developed to determine how SEAM resources are best targeted to achieve the program's objectives.

Chapter 4: Monitoring and Reporting on SEAM's Operation and Effectiveness

21. Current performance information for SEAM focuses largely on monitoring the levels of activity by NT DoE and DHS in relation to business delivery of the enrolment and attendance elements of SEAM. Such information is relevant to assessing the day to day operation, including whether activities are being delivered as planned. However, and despite the three and a half year trial, aspects of the administrative design for the new model of SEAM still do not facilitate the collection of appropriate and complete performance information. This issue is highlighted within both the enrolment and attendance elements—information is not collected on child enrolments or school attendance levels before and after SEAM activities. As a result the impact of these activities in terms of expected change is not readily identifiable.

22. Evaluations of the SEAM trial have observed that the trial's impact on school enrolment was unclear, and that while there were some small improvements in school attendance levels, these often proved temporary. In 2012 the Queensland Government elected not to proceed with SEAM as it did not consider that the model had been effective in that jurisdiction. While some anecdotal evidence was provided to the ANAO that SEAM in the NT is having some positive effects, it will be important for PM&C to finalise the development (commenced by the former DEEWR) of an appropriate performance measurement approach so as to be able to more firmly establish the impact of the measure. In April 2014, PM&C acknowledged that SEAM's existing performance reporting measures had limitations. PM&C advised that it intended to work with NT DoE and DHS to develop an enhanced performance framework, noting that this would require agreement from NT DoE and DHS to provide richer and more detailed performance data.

Summary of agency responses

23. PM&C, DHS, NT DoE, and the Department of Education provided formal responses to the audit, which are included in Appendix 1. Summary responses by PM&C, DHS and NT DoE are provided below.

Department of the Prime Minister and Cabinet

The Department of the Prime Minister and Cabinet considers the audit report from the ANAO to be a balanced report, noting that the audit took place during the early stages of SEAM's rollout.

PM&C accepts the recommendation outlined in the ANAO audit report to improve the consistency and application of SEAM. In April 2014, PM&C held a Bilateral Meeting with the Northern Territory Government to assess SEAM's capacity to address the attendance of all children in a timely manner and to develop a clearer approach for targeting SEAM resources. PM&C will continue to work in collaboration with the Northern Territory Government and the Department of Human Services to improve the consistency and application of SEAM through the development of performance targets, an agreed strategy for targeting SEAM resources and an enhanced performance monitoring framework.

Department of Human Services

The Department of Human Services welcomes this report and considers that implementation of its recommendation will enhance the administration of the Improving School Enrolment and Attendance through Welfare Reform Measure.

The Department of Human Services agrees with the ANAO's recommendation and will work closely with both the Department of the Prime Minister and Cabinet and the Northern Territory Department of Education to progress.

Northern Territory Department of Education

The Northern Territory acknowledges that the objective of the audit was to assess the effectiveness of the administration of the Improving School Enrolment and Attendance through Welfare Reform Measure (SEAM) by the Department of the Prime Minister and Cabinet (PM&C) and the Department of Human Services (DHS) from its commencement in 2013.

The audit's primary finding with regards to strengthening SEAM implementation is based on PM&C, DHS and the NT Department of Education (NT DoE) working collaboratively to maximise SEAM outcomes. The Australian National Audit Office recognises that reasonable arrangements

have been established to support collaboration between Australian Government and Northern Territory Government agencies and suggests there is scope to develop a clearer approach to the targeting of SEAM resources including in relation to the contribution of other school attendance initiatives.

The Department of Education considers SEAM to be an integral part of the suite of measures employed to improve school attendance. NT DoE is supportive of measures that will align SEAM with other school attendance initiatives including our own Every Child Every Day and the Australian Government's new Remote Schools Attendance Strategy.

The NT Department of Education supports further collaboration with PM&C and DHS in implementing the following actions identified in the report:

- expedite enrolment data collection
- assess SEAM's current capacity and explore opportunities to improve capacity
- develop an agreed approach to targeting SEAM resources
- finalise service level agreements between agencies.

The audit notes that there is some anecdotal evidence that SEAM is having some positive effects and suggests that it is important that PM&C develops an appropriate performance management approach in order to establish the impact of SEAM. To this end NT DoE is committed to working with PM&C and DHS to develop an enhanced performance framework including the provision of richer and more detailed performance data where appropriate.

In summary, NT DoE acknowledges that implementation of SEAM has to date occurred in two of the four scheduled phases and is just one year in to the ten year application of SEAM in the Northern Territory. Much has been learned over the course of the past year and NT DoE looks forward to further collaboration with Australian Government agencies to improve SEAM's effectiveness through strengthening key aspects of service delivery and performance reporting arrangements.

Recommendations

The ANAO has made one recommendation directed towards PM&C strengthening its program implementation.

Recommendation No. 1

Paragraph 3.19

To improve the consistency of the application of SEAM processes aimed at improving school attendance levels, and to seek to maximise and sustain their impact, the ANAO recommends that, in consultation with the Northern Territory Department of Education and the Department of Human Services, the Department of the Prime Minister and Cabinet:

- assess SEAM's current capacity to address all children who meet the criteria of the attendance element, in a timely manner;
- develop a clearer approach to target SEAM resources to achieve its objectives.

PM&C response: *Agree.*

DHS: *Agree.*

NT DoE: *Agree.*

Audit Findings

1. The Improving School Enrolment and Attendance through Welfare Reform Measure

This chapter introduces the Improving School Enrolment and Attendance through Welfare Reform Measure (SEAM), including outlining its evolution, how it currently operates, and other school attendance measures which operate alongside SEAM. This chapter also outlines the audit approach.

Introduction

1.1 Australia generally performs well in relation to school attendance. As the 2013 Council of Australian Governments (COAG) Reform Council report on five years of performance in education in Australia demonstrates, the substantial majority of children regularly attend school.⁹ However, the report noted that attendance levels of children in some areas lag behind the national average. In particular, the report highlighted the ‘large decreases’ in attendance levels of Indigenous secondary school students in the Northern Territory (NT). Furthermore, the Australian Government Minister for Indigenous Affairs recently commented that ‘in the Northern Territory, only 13 per cent of kids are attending school 80 per cent of the time. This has to change.’¹⁰

1.2 The Improving School Enrolment and Attendance through Welfare Reform Measure (SEAM) requires parents or carers, as a condition of their welfare payments, to ensure their children are enrolled in and attending school. SEAM offers social work support to help parents overcome barriers to school enrolment and attendance, and as a last resort, parents may have their welfare payments suspended. SEAM currently operates in specific sites and schools in the NT, including a number of predominantly Indigenous communities.

1.3 Improving school enrolment and attendance is an issue which governments at both Commonwealth and state and territory levels have

9 COAG Reform Council, *Education in Australia 2012: Five years of performance*, Sydney, COAG Reform Council, 2013, pp. 22 and 57.

10 Senator the Hon. N Scullion, (Minister for Indigenous Affairs), ‘Government unveils plan to get remote Indigenous children back to school’, media release, Parliament House, Canberra, 20 December 2013.

sought to address through several different measures. By law, enrolment and attendance at school or at an acceptable education alternative, is compulsory for children of certain ages in all States and Territories.¹¹

1.4 The *Social Security (Administration) Act 1999* (the Act) provides the legislative basis for SEAM, including the provision of individual school enrolment and attendance information to the Australian Government. The Act also defines the scope of the measure, and the operation of key SEAM procedures, such as the suspension of payments.

1.5 SEAM is jointly administered by the Department of the Prime Minister and Cabinet (PM&C), the Department of Human Services (DHS) and the Northern Territory Department of Education (NT DoE). Prior to Machinery of Government changes in September 2013, the former Department of Education, Employment and Workplace Relations (DEEWR) was responsible for the development of SEAM policy and overseeing SEAM's implementation. DHS and NT DoE are responsible for the day-to-day service delivery of the measure, within the policy parameters which are now the responsibility of PM&C.

The evolution of SEAM

1.6 Poor school attendance in the Northern Territory was highlighted in the 2007 *Little Children are Sacred* report. The Board of Inquiry into the Protection of Aboriginal Children from Sexual Abuse were dismayed 'at the miserable school attendance rates for Aboriginal children and the apparent complacency here (and elsewhere in Australia) with that situation'.¹² In its response to the report, the then Government announced the NT Emergency Response, which included a number of measures to address school enrolment and attendance such as improving school infrastructure and boosting teacher numbers. The following year, Australian governments agreed to the National

11 Under the Northern Territory's *Education Act*, school enrolment and attendance is mandatory between the ages of 6 and 17 (or upon completion of Year 10 of secondary education). The *Education Act* provides for a range of enforcement powers which may be applied in the event of non-compliance.

12 Northern Territory Government, Report of the Board of Inquiry into the Protection of Aboriginal Children from Sexual Abuse, *Ampe Akelyernemane Meke Mekarle* "Little Children are Sacred", NT Government, Darwin, 2007, p. 18.

Indigenous Reform Agreement and its six 'Closing the Gap' targets relating to life expectancy, infant mortality, education and employment.¹³

1.7 In this context, and as part of the then Government's broader initiatives to reform the welfare system, the Australian Government announced the School Attendance and Enrolment Pilot in the 2008–09 Commonwealth Budget. The Government's intention was to trial the conditional linkage of school enrolment and attendance to welfare payments in a small number of locations, for possible broader application if the trial was found to be successful.¹⁴

1.8 The School Attendance and Enrolment trial commenced in six sites (involving 14 schools) across the NT from January 2009. The trial was subsequently expanded to a further six sites (involving 30 schools) in Queensland from October 2009. With the original trial period nearing completion, further funding was provided in the 2011–12 Commonwealth Budget to continue the trial in NT and Queensland until 30 June 2012. However, in mid-2012, the Queensland Government announced that it would not continue to participate in the measure due to concerns about the effectiveness of the approach in that jurisdiction.¹⁵

SEAM in the Northern Territory

1.9 In August 2012, the Australian and NT governments agreed to the *National Partnership Agreement on Stronger Futures in the Northern Territory* (the SFNT National Partnership). For the agreement, funding of \$107.5 million over ten years was allocated under the *Stronger Futures in the Northern Territory* Budget measure to implement a revised model of the trial. The new model,

13 The six targets are to: close the gap in life expectancy within a generation (by 2031); halve the gap in mortality rates for Indigenous children under five by 2018; ensure access to early childhood education for all Indigenous four year olds in remote communities by 2013; halve the gap in reading, writing and numeracy achievements for children by 2018; halve the gap for Indigenous students in Year 12 (or equivalent) attainment rates by 2020; and halve the gap in employment outcomes between Indigenous and other Australians by 2018.

14 The Hon J Macklin, (former Minister for Families, Housing, Community Services and Indigenous Affairs), *Second Reading Speech House Debate Social Security and Veterans' Entitlements Legislation Amendment (Schooling Requirements) Bill 2008*, House of Representatives, Canberra, 4 September 2008, p. 7207.

15 The Honourable John-Paul Langbroek, (Minister for Education, Training and Employment), 'SEAM trial did not work: Education Minister', media release, Queensland, 18 June 2012. The Queensland Minister stated that: 'The Queensland Government will not participate in an extension of the Federal Government's Improving School Attendance through Welfare Reform Measure (SEAM) trial because it failed to produce any significant change in student attendance rates.' Discussion on the operation and evolution of the trial in both the NT and Queensland, and the lessons learnt is provided in Appendix 2.

entitled the Improving School Enrolment and Attendance through Welfare Reform Measure, commenced in March 2013.¹⁶

1.10 Of the funding provided under the SFNT National Partnership, almost \$22 million was allocated to the NT Government for Enrolment and Attendance Truancy Officers and Data Officers to support the implementation and operation of SEAM. Approximately \$74 million was allocated to DHS for staffing costs, mainly for the provision of Social Workers, and IT system development and maintenance.¹⁷ The remaining funding was allocated to DEEWR for program oversight and policy support.

Cross agency coordination

1.11 The effective implementation of SEAM requires collaboration and coordination between Australian and NT government agencies. More successful cross-jurisdictional collaboration will generally involve the establishment of clear roles and responsibilities and cross-agency communication mechanisms to coordinate and support the program's implementation.

1.12 The SFNT National Partnership provides an appropriate framework for establishing roles and responsibilities, as well as performance measures, reporting requirements and governance arrangements for the NT Government. A specific implementation schedule for schooling-related activity also provides a relevant framework to support collaboration between the Australian and NT governments.

1.13 The planning for SEAM was overseen by a steering committee and a number of working groups, which included representatives from the former DEEWR, DHS and NT DoE.¹⁸ Numerous cross-agency planning and implementation meetings were held over the course of more than a year to

16 The then Australian Government originally intended for the new SEAM model to immediately follow the end of the SEAM trial, in July 2012. However, the National Partnership had not been finalised by the time that the caretaker period for the 2012 Northern Territory Election commenced, and negotiations were put on hold. The negotiations for the Schooling Implementation Plan (required under the National Partnership for SEAM) were subsequently finalised in March 2013. With the Implementation Plan signed, the departments worked to commence implementation of SEAM from March and April 2013.

17 The majority of the \$74 million in funding (approximately \$45 million) was allocated for staff, particularly Social Workers in the Northern Territory to implement SEAM. Under the attendance element, Social Workers are made available to work with identified families.

18 The Department of Families, Housing, Community Services and Indigenous Affairs, now the Department of Social Services, was also present during SEAM's planning because SEAM related to welfare payments, families and Indigenous affairs.

coordinate efforts for the new SEAM model. The meetings facilitated the development of agreed system and business processes, including protocols for the exchange of personal data, and communication strategies.

1.14 During the rollout of SEAM to communities in 2013, the relevant departments typically met on a monthly basis, focusing on specific operational issues as they arose. A significant level of goodwill was demonstrated, particularly by DHS and NT DoE, in making refinements to administrative processes throughout the course of the year. The cross-agency arrangements for SEAM further evolved in late 2013, with the formation of a single monthly 'operational policy meeting' between representatives of PM&C, DHS and NT DoE. The committee is responsible for overseeing SEAM's progress against milestones and providing technical, operational and policy advice to staff on the ground.

Other school enrolment and attendance measures

1.15 In the Northern Territory, SEAM runs alongside the NT Government's *Every Child, Every Day* (ECED) initiative which aims to address school absenteeism through a similar process of school conferences and attendance plans, with any subsequent non-compliance potentially resulting in parents being fined. Initial fines can be in the order of \$300. Within SEAM communities, the Australian and NT governments have agreed to not employ both measures concurrently, and that a SEAM 'cycle' of conferences, plans and possible suspensions would be conducted before a 'cycle' of ECED processes may be instigated.

1.16 As schools are primarily responsible for school attendance matters, including for maintaining the attendance roll and contacting parents of absent children (sometimes involving home visits), a range of programs which seek to improve attendance are provided by NT schools.¹⁹ The Australian Government has recently introduced a further measure to improve school attendance, the Remote School Attendance Strategy (RSAS), announced in December 2013.

¹⁹ These programs include those which provide: breakfast and/or lunch; transport to and from school; or seek to improve attendance through the promotion of sport and cultural activities.

RSAS will provide \$46.5 million over two years to engage 'local people in each community to get kids to school'.²⁰

Evaluation of the trial

1.17 In developing the new SEAM model, the then DEEWR and DHS had the advantage of being able to draw upon the experience of the three and a half year trial which was allocated funding of \$31.2 million. The Australian Government has published two evaluation reports to date with a final report yet to be published.

1.18 The 2010 evaluation report found that the impact of SEAM on school enrolment was unclear, largely because of insufficient enrolment history for non-government schooling systems and student movements between education systems and SEAM and non-SEAM sites. With respect to school attendance, the evaluation found that while SEAM was starting to have a positive impact, there was evidence suggesting that a relapse in attendance after the compliance period was common. The evaluation also noted a number of implementation issues, including a range of data-related issues which hampered the department's ability to evaluate the measure.²¹ The operation and evolution of the trial, and the lessons learnt are provided in Appendix 2.

How SEAM operates

1.19 SEAM has two main elements, one related to reducing the number of children who are of compulsory school-age, but are not enrolled in an educational institution or eligible schooling alternative²²; and the other designed to assist in identifying children who have problems with attendance and put in place strategies to help address these issues.²³

20 RSAS commenced from Term 1 2014, and will operate in 73 remote communities in the NT, South Australia, New South Wales, Queensland and Western Australia. PM&C advised the ANAO that once both measures are fully rolled out, RSAS will operate in 20 NT schools in which SEAM will also operate. Senator the Hon. N Scullion, (Minister for Indigenous Affairs), 'Government unveils plan to get remote Indigenous children back to school', media release, Parliament House, Canberra, 20 December 2013, and Senator the Hon. N Scullion, (Minister for Indigenous Affairs), 'Government expands remote school attendance strategy', media release, Parliament House, Canberra, 24 March 2014.

21 DEEWR, *Improving School Enrolment and Attendance through Welfare Reform Measure (SEAM) Evaluation Report for 2010*, DEEWR, Canberra, 2012, pp. iii–v.

22 Such as approved home schooling or a full-time traineeship.

23 Parents who have their welfare payments suspended under either component and subsequently comply within the 13 week suspension period will generally have their payments reinstated with full backpay. As SEAM is limited to specific sites and schools in the NT, if a child moves outside of a SEAM site or school, active compliance actions are no longer pursued.

1.20 SEAM applies to parents or carers (in-scope parents) who: live in a designated SEAM community; are responsible for the care of one or more school-age children²⁴; and receive certain income support payments. The income support payments (known as ‘schooling requirement payments’) defined by the *Social Security (Administration) Act 1999*, which are conditionally linked to SEAM, are listed in Table 1.1.

Table 1.1: Income support payments subject to SEAM

Payment Group	Payment Types
Social Security Benefit	Widow Allowance, Youth Allowance, Newstart Allowance, Sickness Allowance, Partner Allowance, Mature Age Allowance, Parenting Payment Partnered, Austudy, and Special Benefit.
Social Security Pension	Parenting Payment Single, Disability Support Pension, Bereavement Allowance, Age Pension, Carer Payment, Wife Pension, Mature Age Partner Allowance and Widow B Pension.
Department of Veterans’ Affairs	Service Pension, Income Support Supplement and Defence Force Income Support Allowance.

Source: PM&C.

1.21 An incorrect decision by DHS regarding welfare payments may have severe economic and other impacts for recipients. Therefore, it is important that individuals can have decisions reviewed which they believe are incorrect. Review and appeals processes are specified in Part 4 of the *Social Security (Administration) Act 1999*, including three key mechanisms for reviewing decisions: an internal review, a review by the Social Security Appeals Tribunal, and a review by the Administrative Appeals Tribunal. The Act also provides for the continuation of payments pending a review. Parents are advised of the ability to appeal a SEAM decision in SEAM notices, as well as in payment suspension letters and during compulsory conferences. In 2013, four requests for an internal review by DHS were made under SEAM.

1.22 SEAM is to be implemented in 23 Northern Territory communities (SEAM communities), covering 52 schools in four phases by 2015. While SEAM may apply to parents of any background, the SEAM communities all have a high proportion of residents who are Indigenous Australians. The communities subject to SEAM were agreed by the Australian Government and Northern Territory Government as part of the SFNT National Partnership. Under the

24 Under SEAM, for someone to be considered a parent or guardian of a child, the child must be in the parent’s care at least 14 per cent of the time.

National Partnership, SEAM has continued in each of the SEAM trial communities and will expand into each of the 'Remote Service Delivery' sites, (which are a focus of the National Partnership) and surrounding communities or regional centres. To discourage parents electing to change schools to avoid SEAM, all schools within a community were included in SEAM. To reduce the possibility that parents may move from one community to another to avoid the measure, Alice Springs, Tennant Creek and a number of smaller communities adjacent to the SFNT remote service delivery sites were also included.

1.23 The enrolment and attendance elements broadly apply to parents who reside in a SEAM community and receive certain income support payments (which are listed in Table 1.1). However, while the enrolment element applies to all children of these parents, the attendance element only applies to children who attend schools within a SEAM community. This means for example, that the parents of a child attending boarding school outside a SEAM community may have to provide DHS with details of the child's enrolment, but the child's school attendance levels will not be monitored. Table 1.2 lists the communities and the timing of their involvement in the measure.

Table 1.2: Northern Territory SEAM Communities

Phase 1 (March 2013)	Phase 2 (July 2013)	Phases 3 and 4 (July 2014 and January 2015)
Alyangula	Alice Springs	Galiwinku
Angurugu	Lajamanu	Gapuwiyak
Katherine	Ngukurr	Gunbalanya ¹
Katherine Town Camps	Tennant Creek	Maningrida
Milyakburra	Yuendumu	Milingimbi
Ntaria (Hermannsburg)		Nhulunbuy
Numbulwar		Tiwi Islands
Umbakumba		Yirrkala
Wallace Rockhole		
Wadeye		

Source: DEEWR, *Improving School Enrolment and Attendance through Welfare Reform Northern Territory Procedural Guidelines*, DEEWR, Canberra, 2013, p. 6.

Note 1: In late 2013, the Australian Government decided that SEAM would be rolled out to Gunbalanya from term one 2014.

SEAM elements

1.24 SEAM's enrolment element involves a bulk enrolment data collection to gather children's enrolment details (managed by DHS and NT DoE), and an ongoing process to identify parents and children who fall within the scope of

SEAM throughout the year. Welfare payments may be suspended if parents fail to provide information about their children's enrolment to DHS and do not have a reasonable excuse for doing so.

1.25 Under the attendance element, where a child does not attend school regularly, in-scope parents are required to participate in a compulsory conference and agree to enter into a school attendance plan to improve their child's attendance. As part of the plan, an NT DoE Senior Attendance and Truancy Officer (SATO), and in the majority of cases a DHS Social Worker, will work with parents to identify any barriers to school attendance and to develop practical solutions to overcome these. Where parents fail to attend the conference, enter into a plan, or comply with the agreed plan, they may be issued with a formal compliance notice which can lead to the suspension of income support payments.²⁵

SEAM guidance materials

1.26 In establishing the new SEAM model, the former DEEWR in consultation with DHS and NT DoE, developed operational policy and administrative guidance to support the delivery of SEAM consistent with Part 3C of the *Social Security (Administration) Act 1999* which includes:

- section 3.1.10 of the *Guide to Social Security Law (SS Guide)*²⁶, which specifies SEAM requirements, suspensions and cancellations of welfare payments and review processes;
- procedural guidelines which support DHS and NT DoE staff in implementing SEAM processes. For example, compliance periods and processes for the suspension, cancellation and restoration of payments; and
- an attendance plan template (originally developed by the NT Government for the *Every Child, Every Day* initiative) which is used by SATOs when working with families for the attendance measure.²⁷

25 Parents who have their welfare payments suspended under either component and subsequently comply within the 13 week suspension period will generally have their payments reinstated with full backpay. As SEAM is limited to specific sites and schools in the NT, if a child moves outside of a SEAM site or school, active compliance actions are no longer pursued.

26 The SS Guide is maintained by the Department of Social Services and aims to assist in understanding Social Security law and its application.

27 PM&C and NT DoE advised that, as part of an update to the SEAM handbook, attendance plan guidelines and a revised attendance plan template were under development in April 2014.

Audit approach

Audit objective, criteria and scope

1.27 The objective of the audit was to assess the effectiveness of the administration of the Improving School Enrolment and Attendance through Welfare Reform Measure by PM&C and DHS. Three high-level criteria were used to form an opinion against this objective. These criteria examined whether:

- the measure was effectively planned and implemented;
- SEAM processes were effectively managed in compliance with policy stipulations and relevant legislation such as the *Social Security (Administration) Act 1999*; and
- effective monitoring, reporting and evaluation arrangements were established, including to support the continuous improvement of SEAM.

1.28 The audit focused on the administration of SEAM by PM&C (and before September 2013, the then DEEWR) and DHS from its commencement in March 2013. The audit also examined the program's evolution, to determine whether lessons from the trial were effectively applied in the design and implementation of SEAM.

Audit methodology

1.29 The audit methodology involved:

- interviewing relevant staff of PM&C/DEEWR, DHS, NT DoE and FaHCSIA. This included stakeholders and staff working on SEAM in the NT such as school principals, SATOs, and DHS Social Workers;
- reviewing relevant DHS and PM&C/DEEWR documentation, including examining a targeted sample of DHS' customer records for 60 parents who were subject to SEAM enrolment or attendance processes; and
- analysing SEAM data and information, including to explore the targeting of SEAM, and activity levels under the enrolment and attendance elements.

1.30 The audit was undertaken in accordance with the ANAO's auditing standards at a cost to the ANAO of approximately \$350 000.

Report structure

1.31 The remainder of the report consists of:

Chapter Title	Description
2. Delivering SEAM—the Enrolment Element	Examines the administration of the enrolment element, including: the identification of in-scope parents and their children; processes for obtaining enrolment information from schools and parents; and enrolment compliance actions.
3. Delivering SEAM—the Attendance Element	Examines the administration of the attendance element, including: the identification of children with low attendance; delivering conference notices and conducting compulsory conferences; developing school attendance plans; and the possible suspension or cancellation of welfare payments.
4. Monitoring and Reporting on SEAM's Operation and Effectiveness	Examines the activities undertaken by PM&C and DHS to monitor and report on SEAM's operation and effectiveness.

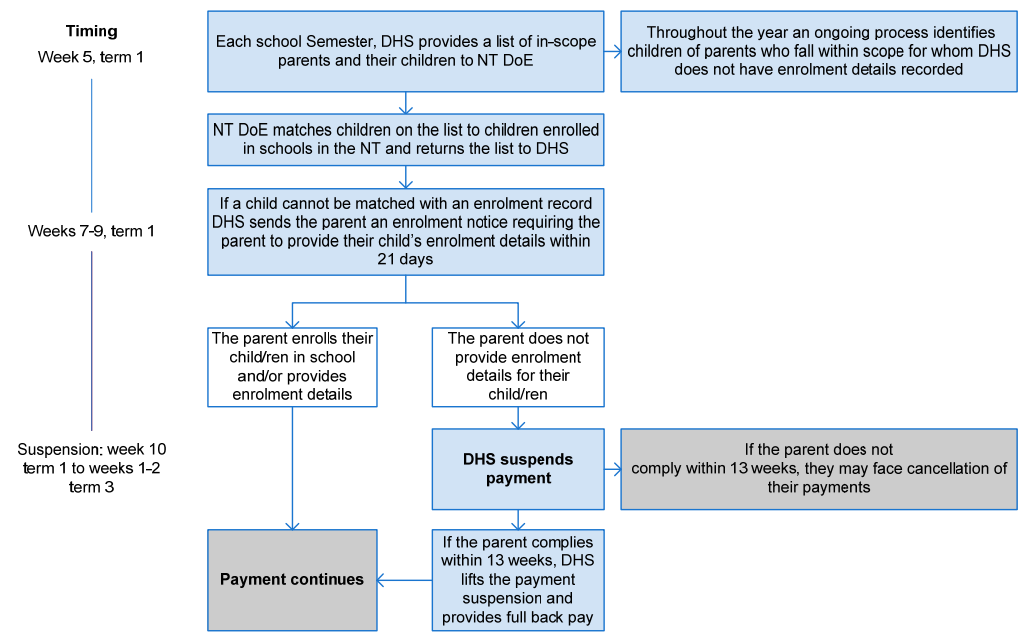
2. Delivering SEAM—the Enrolment Element

This chapter examines the administration of the enrolment element, including: the identification of in-scope parents and their children; obtaining enrolment information from schools and parents; and enrolment compliance actions.

Introduction

2.1 To encourage parents to enrol their school-age children, the enrolment element involves identifying parents who are within the scope of SEAM and requesting school enrolment information for their children. This process is supported by cooperative arrangements which provide for the exchange of children’s enrolment details between DHS and NT DoE. Welfare payments may be suspended if parents fail, following a request, to provide their children’s enrolment to DHS and do not have a reasonable excuse for not providing the information. Figure 2.1 provides an overview of the enrolment process.

Figure 2.1: Overview of the SEAM enrolment process



Source: ANAO, from SEAM program documentation.

2.2 As previously discussed in paragraph 1.11, for SEAM to operate effectively, it was important that cross-agency coordination arrangements were established to support the program’s implementation. As DHS is not directly involved in the delivery of school education services, it does not currently have ready access to up-to-date individual school enrolment information. To avoid the need to request enrolment details directly from all parents, DHS seeks to obtain these from NT DoE (and schools). Protocols were established by the two departments to facilitate the exchange of children’s enrolment details.

2.3 In assessing DHS’s management of the enrolment element of SEAM, the ANAO examined the processes for:

- the identification of all in-scope parents, and obtaining enrolment details for their school-age children; and
- the possible suspension of payments, where appropriate.

Identifying in-scope parents and their children

2.4 As previously mentioned, SEAM’s enrolment element requires DHS to identify parents who are within the scope of SEAM and obtain their children’s enrolment details. To do this, DHS draws on its customer information systems to identify in-scope parents who:

- are in receipt of a schooling requirement payment (for the full list of payments, see Table 1.1);
- are residents in a SEAM community (see Table 1.2)—SEAM’s enrolment element is applied to all children of parents in a SEAM community regardless of where the child attends school;
- have at least one ‘schooling requirement’ child in their care, at least 14 per cent of the time²⁸; and
- are in receipt of Family Tax Benefit (FTB).

2.5 The need for SEAM parents to be in receipt of FTB is not a requirement under the *Social Security (Administration) Act 1999*. DHS advised that the FTB eligibility requirement is included as it is the best-available source of data held

28 A schooling requirement child is defined as being: alive; in the care of a customer; of an age where they are legally required to be enrolled at and attending school in their state or territory; not having completed the required education level of the state or territory; and not be receiving schooling requirement payments in their own right.

by DHS on the parents of school-age children. However, due to differences in minimum care levels in FTB (35 per cent) and SEAM (14 per cent), it is possible that parents who are in-scope for SEAM as per the relevant legislation are not being identified. PM&C and DHS acknowledge this possibility, and while DHS is unable to estimate the size of this population, it advised that the numbers of such parents would likely be very small.

2.6 During 2013, DHS identified a total of 2481 parents of 4509 children as in-scope for the enrolment element of SEAM. PM&C advised that the number of in-scope parents and children in 2013 for the enrolment element was slightly higher than originally anticipated (based on discussions with the NT Government in developing SEAM) due to changes in the phased rollout of SEAM, and the addition of one community (Milyakburra). Table 2.1 shows the numbers of in-scope parents and children, as at the end of 2013.²⁹ The table shows both the cumulative numbers of in-scope parents and children, and the ‘point in time’ numbers as at the end of the year (mid-December 2013).

Table 2.1: Total number of in-scope parents and children, 2013 (Phase One and Two communities)

	Cumulative	Point-in-time
Parents	2481	1884
Children	4509	3255

Source: ANAO, from DHS monitoring data.

Obtaining enrolment information from schools and parents

2.7 Once in-scope parents and their children are identified by DHS, their details are provided to NT DoE for matching with child school enrolment data. In 2013 a data exchange (known as the bulk enrolment data collection process) occurred around week five of the first school term. Where an enrolment record for a child was not matched through this process, DHS sent parents an enrolment notice requiring them to provide their child’s enrolment details within 21 days.

2.8 In addition to the bulk process, an ongoing process was implemented to identify any remaining parents (without a child enrolment record) and issue

29 Note: Data for 2013 was taken from 13 December 2013, as the school year had ended in the Northern Territory on 12 December 2013.

an enrolment notice. This included parents who moved into a SEAM community during the course of the year. A second bulk enrolment data collection is conducted around five weeks into Term Three, to validate and update the enrolment information DHS had obtained earlier in the year.

The bulk enrolment data collection process

2.9 For the two enrolment collections conducted in 2013, DHS obtained enrolment information for a high proportion of in-scope children. For the first collection, NT DoE provided enrolment details for 1093 of the 1421 children (77 per cent) which DHS had identified as being in-scope at that time. For the second collection, NT DoE provided details for 2141 of the 2547 children (84 per cent) identified as in-scope by DHS at the time.

Bulk enrolment data collections in 2013

The first bulk enrolment data collection commenced in March 2013 and was finalised in May 2013. DHS commenced the process by providing a list of all school-age children of parents found to be in-scope for SEAM to NT DoE. The list contained a unique identifier for each child, their names, gender, date of birth, and a school attendance identifier. As the list contains personal details, it was provided to NT DoE via an online mail system designed to allow the secure transfer of electronic files.

After ‘matching’ children in the DHS list to children enrolled in schools in the Northern Territory, NT DoE returned the list to DHS. The returned list included four additional categories of information—a school identifier, date of enrolment, year of study for each child, and an indicator of whether the child is considered to be ‘passively enrolled’.³⁰ After conducting basic data validity checks and re-confirming that the children in the list remained in-scope for SEAM, DHS imported the information into SEAM customer data. The second bulk enrolment collection, to validate and update enrolment information, commenced in late August 2013 and was finalised in mid-September 2013.

Impact of timing of processes on school enrolments

2.10 The bulk enrolment process was developed during the SEAM trial to reduce the administrative burden associated with collecting enrolment details from in-scope parents. The timeliness of the process was an issue identified in the evaluation of the SEAM trial. During the trial these processes took up to four months to complete.

³⁰ A child who is passively enrolled has at least 20 sequential unauthorised absences from school and no notification had been received that the child was enrolled in another school. For both data collections, NT DoE’s data indicated that just over seven per cent of ‘matched’ children were passively enrolled at the times the data was provided.

2.11 The bulk enrolment data collection currently commences each year around five weeks into the first school term.³¹ DHS and NT DoE aim to complete the matching process in 17 days. Parents who are not matched in the collection are then provided a further three weeks in which to respond to any subsequent request for enrolment details. If a parent has still not provided enrolment details for their child/ren, DHS may suspend their income support payments. Taken together, these timings mean that at best, if a child was not enrolled for school, the SEAM enrolment process may not take action to encourage their enrolment until a week or two into the second term of the school year. This means that the child may have missed an entire term of school before action is taken under SEAM. The process operates in a more timely fashion throughout the remainder of the year—parents who fall within the scope of SEAM are immediately sent an enrolment notice by DHS.

2.12 During 2014, PM&C advised the ANAO that it is in the process of working with DHS and NT DoE to expedite the enrolment data collection process, enabling enrolment data to be available earlier in the school term. This is expected to provide for more timely identification of children who may not be enrolled at school and ensure appropriate follow up action from DHS.

Enrolment notices

2.13 The *Social Security (Administration) Act 1999* (the Act) stipulates that an enrolment notice can be sent to parents requiring them (or another person) to provide written or oral evidence that the child is enrolled at a school, as required by a law of a State or Territory. Under the Act, the enrolment notice must give details of how to comply with the notice; the initial period for compliance with the notice; and the consequences of not complying with the notice.³²

2.14 DHS determined that the period for compliance is 21 days after the letter was prepared (to account for the 14 days required under the Act, and a further seven days to allow for the notice and/or the response to be delivered via mail). As noted in paragraph 2.6, a total of 4509 children had been

31 PM&C advised that the bulk enrolment data collection began in week five of the term to align with NT Government's schools census collection period and because at the time of first rollout, collection of enrolment information was largely manual and had a significant lag time.

32 *Social Security (Administration) Act 1999* (Cth) s. 124F.

identified as being in-scope for SEAM at some point during 2013. By the end of 2013, DHS had sent enrolment notices concerning 3172 of these 4509 children.

Possible suspension of payments under the enrolment element

2.15 The Act stipulates that if parents subject to an enrolment notice do not provide enrolment details for their child/ren within the specified time period, and DHS determines that no reasonable excuses or special circumstances³³ exist, DHS must suspend the parent's schooling requirement payment.³⁴ If parents do not provide DHS enrolment details within 21 days, DHS will make two attempts to contact the parents, before applying a suspension. Suspended payments can be restored, with full back-pay, if parents subsequently provide enrolment details, fall out of scope for SEAM, or demonstrate that reasonable excuses or special circumstances exist.³⁵ If payments are suspended for a total of 13 weeks or more, DHS may cancel the payments.

2013 compliance

2.16 The number of activities which occurred under the enrolment element of SEAM during the course of 2013 are provided in Table 2.2.

Table 2.2: Number of SEAM activities under the enrolment element, as at the end of 2013 (Phase One and Two communities)

Enrolment element		
No. of parents and children in-scope for SEAM	Parents	2481
	Children	4509
No. of enrolment notices issued	Children	3172
No. of payment suspensions applied	Parents	254
No. of payment cancellations applied	Parents	0

Source: ANAO, from DHS monitoring data.

33 The *Social Security (Administration) (Schooling Requirement) Determination 2009 (No. 1)* outlines a range of reasonable excuses for failing to comply with enrolment processes. An example of a reasonable excuse is where a child has a serious illness or disability that cannot be reasonably accommodated by a school. Reasonable excuses are to be verified and assigned a review period (generally between two to four weeks in duration).

34 *Social Security (Administration) Act 1999* (Cth) s. 124G.

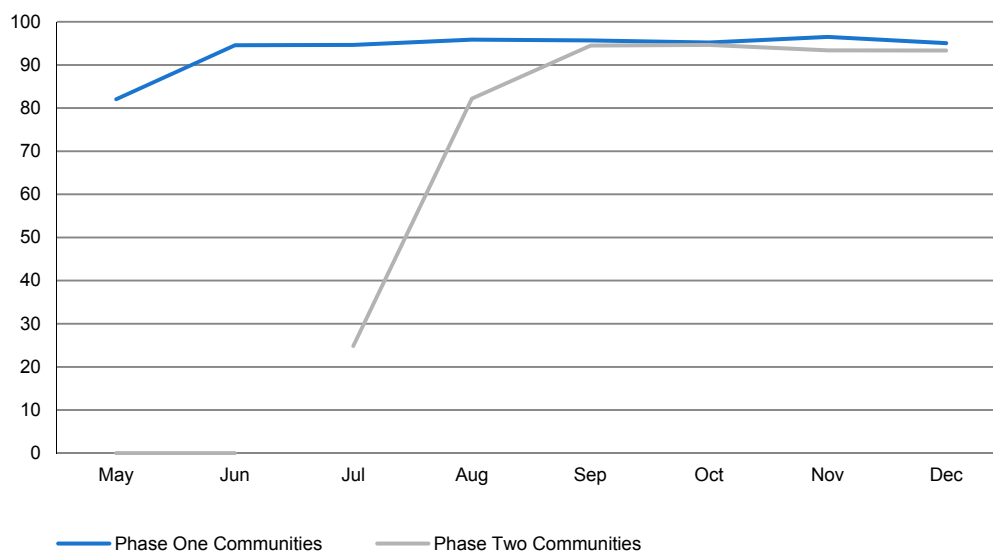
35 Note: payment suspensions under SEAM are lifted during school holidays. Enrolment notices are valid for the year that they are issued only and do not remain in force during subsequent years.

2.17 As at the end of 2013, of the enrolment notices concerning 3172 children that had been sent to parents, notices concerning 2288 children were deemed to have been complied with (72 per cent). Notices concerning a further 110 children remained active (that is, the 21 days had not yet passed), and notices concerning 772 children had since been rendered obsolete with parents moving out of scope of SEAM. However, for the obsolete notices, a majority of parents had provided enrolment details to DHS, meaning that, in total, enrolment details had been obtained for more than 90 per cent of notices issued in 2013.

2.18 These numbers depict the results of the enrolment process as at the end of year, with the overwhelming majority of notices having been resolved. DHS advised that a total of 254 parents had had their welfare payments suspended throughout 2013. Of these, a majority had since provided enrolment details and been deemed compliant by DHS. No parents had their payments cancelled by DHS in 2013 under the enrolment element. DHS advised that no cumulative count of special circumstances or reasonable excuses determined under the enrolment element had been recorded and was not originally requested by the now former DEEWR. However, a cumulative count was to be recorded from 2014.

2.19 Figure 2.2 shows the percentage of children of parents subject to SEAM, for whom DHS had enrolment details recorded each month over the course of 2013. The figure shows that DHS retains enrolment details for over 90 per cent of children of in-scope parents.

Figure 2.2: Percentage of children for whom DHS had enrolment details, 2013 (Phase One and Two communities)



Source: ANAO, from DHS data and program assurance reporting.

Note: While SEAM commenced in March 2013, full data extraction did not commence until May 2013. The rollout of SEAM to Phase Two communities commenced from July 2013. While enrolment notices remain active, it is not possible to obtain details for 100 per cent of in-scope children.

Outcomes of enrolment element

2.20 While a majority of enrolment notices were deemed to have been complied with (in that parents had provided enrolment details to DHS), the actual effect of a notice is not known to PM&C or DHS including whether the child was already enrolled in school, or if the child had not been enrolled and the SEAM interaction had prompted parents to do so (which is the purpose of the measure). It is possible that a significant proportion of the activity under the element is simply requiring parents who had already enrolled their children to contact DHS because the respective NT DoE and DHS data did not match. For further discussion, refer to paragraph 4.14.

Verification of details provided by parents

2.21 DHS may verify enrolment details provided by parents with NT DoE, where DHS determines it appropriate to do so. An example provided in SEAM guidance is if DHS has received conflicting advice from parents, or there is reason to doubt the information provided.

2.22 In practice, DHS staff advised the ANAO that enrolment details provided by parents were very rarely verified.³⁶ Given the nature of the information required, there may be benefit in DHS, in conjunction with NT DoE, examining the reliability of a sample of enrolment details provided by parents. DHS advised that it supported such a process, but as at April 2014, PM&C was still in discussions with NT DoE as to how this process would operate.

ANAO sample of enrolment processes

2.23 The ANAO examined DHS customer records for a sample of 29 parents who had been sent an enrolment notice. The targeted sample included instances in which special circumstances or reasonable excuses were determined, or payment suspensions had been applied.

2.24 In all cases, DHS had waited the full 21 days for parents to respond to an enrolment notice. In general, DHS had shortly thereafter (typically within days) made two attempts to contact parents, where DHS had a contact phone number on record. However, the ANAO identified a very small number of instances in which there were significant delays in following up on enrolment notices after the 21 day period had lapsed. DHS advised that it had commenced a process in October 2013 to check for unresolved notices which exceed the 21 day period. Of the 29 parents sampled by the ANAO, 11 had their payments suspended for not complying with an enrolment notice.³⁷ The application of payment suspensions by DHS was generally timely.

2.25 The ANAO examined the cases of four parents who had been deemed to have special circumstances or a reasonable excuse under the enrolment element of SEAM. In all four cases, the parents or children were experiencing circumstances which aligned with those outlined in SEAM guidance. However, DHS had not routinely reviewed two of the cases to confirm the continuing presence of the special circumstances or reasonable excuse, or to check if actions to resolve the respective situations had been completed. DHS

36 In contrast, as noted in the 2010 evaluation report of the SEAM trial, the vast majority of enrolment information received during the trial in 2009 was verified by education authorities. The report further noted that a very small number of parents provided inaccurate information about the enrolment status of their children, and these parents' payments were subsequently suspended. DEEWR, *Improving School Enrolment and Attendance through Welfare Reform Measure (SEAM) Evaluation Report for 2010*, DEEWR, Canberra, 2012, p. 14.

37 Note: The sample is not indicative of the broader SEAM population.

advised that it had introduced a process in February 2014 to further monitor suspensions and special circumstances.

2.26 The ANAO's case review highlighted the often significantly complex and dynamic circumstances in which SEAM is being applied. It was relatively common for parents to change addresses; or for payments to be suspended or cancelled for non-SEAM reasons. These changes can result in parents falling in or out of scope of the enrolment element of SEAM. Given these circumstances, DHS had generally applied enrolment processes and payment decisions appropriately, including in accordance with relevant legislation.

Conclusion

2.27 During 2013, 2481 parents of 4509 children were identified as in scope of the enrolment element. Throughout most of the year, DHS with the cooperation of NT DoE held enrolment details for more than 90 per cent of these children. Although 254 parents had their payments suspended at some point in 2013, most promptly provided enrolment details to DHS and had their payments restored. No parent had their payments cancelled under the enrolment element in 2013. DHS generally applied enrolment processes and payment decisions appropriately, including in accordance with relevant legislation.

2.28 The timeliness of the enrolment process has improved compared to the trial program that preceded SEAM. Nonetheless, under current arrangements, if a child was not enrolled for school in term one, the SEAM enrolment process may not take action to encourage their enrolment until a week or two into the second term of the school year. In April 2014, PM&C advised the ANAO that it intended to commence discussions with NT DoE and DHS to expedite the enrolment data collection process.

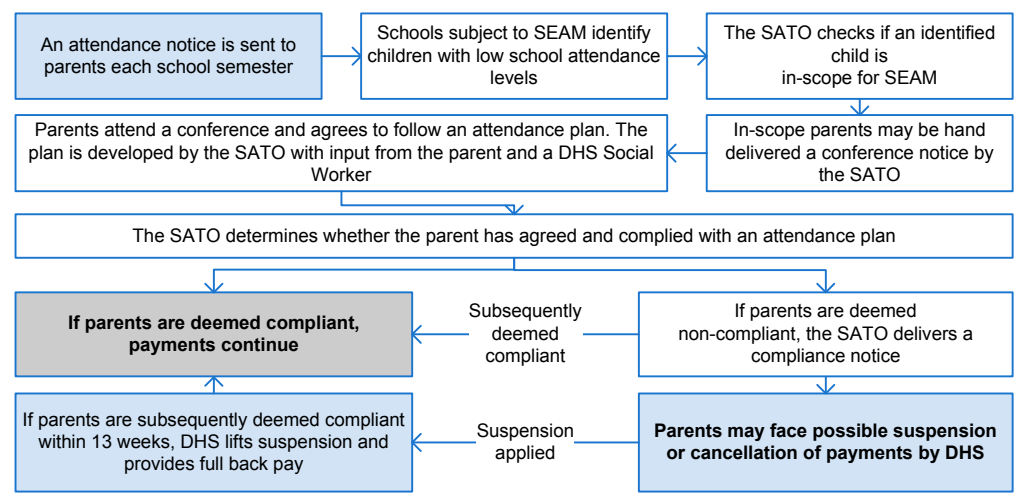
3. Delivering SEAM—the Attendance Element

This chapter examines the administration of the attendance element, including: the identification of children with low school attendance; delivering conference notices and conducting compulsory conferences; developing school attendance plans; and the possible suspension of income support payments.

Introduction

3.1 Under the attendance element of SEAM, if a child does not attend school regularly, parents can be required to participate in a compulsory conference and agree to enter into a school attendance plan. This process is resource intensive, and involves an NT DoE Senior Attendance and Truancy Officer (SATO), and in most cases a DHS Social Worker, working with parents to help them identify any barriers to school attendance and develop practical solutions to overcome these barriers. Where parents fail to attend the conference, enter into a plan, or subsequently comply with an agreed plan, they may be issued with a compliance notice which can lead to the suspension and cancellation of their welfare payments. An overview of the SEAM attendance processes is provided in Figure 3.1.

Figure 3.1: Overview of the SEAM attendance process



Source: ANAO, from SEAM program documentation.

3.2 This audit is focussed on the administration of SEAM by PM&C and DHS. However, given the central role played by NT DoE, this chapter also examines areas in which DHS and NT DoE work in partnership to deliver SEAM. As noted in paragraphs 1.11 and 2.2, the successful implementation of SEAM relies on effective collaboration across jurisdictions. This is particularly the case for the SEAM attendance element which involves the execution of statutory powers. To reflect that some powers are being exercised by NT government officers on behalf of the Australian Government, formal delegation of powers have been made to SATOs to conduct SEAM activities.³⁸

3.3 In reviewing the attendance element of SEAM, the ANAO considered:

- the processes to identify children with low school attendance, and to confirm that the child is in-scope for SEAM;
- the delivery of conference notices and the scheduling of compulsory conferences;
- the conduct of compulsory conferences;
- the development of school attendance plans; and
- the possible suspension of payments under the attendance element, including SATOs' monitoring of parents' compliance with plans.

3.4 The ANAO's examination of the attendance element of SEAM involved discussions in the NT with SATOs, Social Workers and other relevant DHS and NT DoE departmental officials; and also a number of principals of schools in which SEAM was operating. As with the enrolment element, the ANAO also reviewed a sample of DHS customer records to gain insight into the administration of SEAM attendance processes.

The application of the attendance element and attendance notices

3.5 During 2013, some 2000 parents of more than 3400 children were *potentially* in-scope for SEAM's attendance element—in that they were receiving income support payments and living in a SEAM community with a school age child who attends a school in the community. The 'point in time' numbers as at the end of the year are also provided in Table 3.1.

38 SATOs were delegated powers to conduct SEAM activities by the former Minister for Families, Community Services, Housing and Indigenous Affairs. *Social Security (Administration) Act 1999* (Cth), *Social Security (Administration) (Schooling Requirements—Person Responsible) Specification 2012* (Cth).

Table 3.1: Total number of parents and children potentially in-scope for attendance element, 2013 (Phase One and Two communities)

	Cumulative	Point-in-time
Parents	2001	1629
Children	3441	2689

Source: ANAO, from DHS monitoring data.

3.6 DHS typically sends all in-scope parents an attendance notice twice each year. The letter advises parents of SEAM's application to their community, and outlines SEAM requirements and the potential implications of low school attendance.

3.7 In addition to this formal correspondence, the relevant departments conducted activities to raise awareness of the program. In particular, prior to the commencement of SEAM in each community, a general public community information session was conducted to provide advice on SEAM policy, how it potentially affected income support payments, the role of SATOs and Social Workers, and how *Every Child, Every Day* and SEAM were to interact.

Identification of children with low school attendance

3.8 Schools in SEAM communities are responsible for identifying children with low attendance levels. Low school attendance is defined under SEAM as 10 or more unauthorised absences³⁹ accrued in the previous 10 school weeks. In many cases, the selection of children for the attendance process has been conducted by schools in conjunction with a SATO.

3.9 Schools (and sometimes SATOs) review attendance rolls to identify children with less than 80 per cent attendance levels (80 per cent being equivalent to 10 unauthorised absences over 10 weeks). However, SATOs advised the ANAO that because of the significant numbers of children with attendance levels under 80 per cent, only a relatively small number of children could be selected for action each term.

3.10 Schools and SATOs reported using a number of different approaches in selecting students with low school attendance. Some schools and SATOs had

39 An unauthorised absence occurs when the parent fails to notify the school of the reason for an absence or a reason provided by the parent is deemed unacceptable. This benchmark was jointly agreed by the Australian and Northern Territory governments.

opted to focus on children with very low attendance levels (for example, 0–20 per cent attendance), because it was important to reconnect these children with the schooling system. Others had elected to focus on children with higher levels of attendance, as it was believed that it would be important to achieve some early ‘successes’. Some schools and SATOs were deliberately selecting a mix of children with different levels of attendance. The ANAO was also advised that certain schools and SATOs had elected to focus on students of particular ages (usually younger age groups), or had opted to focus on children with histories of better behaviour (so as to minimise any disruption within classes as a result of some children’s return to school).⁴⁰

Other factors impacting on the selection of children for SEAM

3.11 Also impacting on which children were selected under the attendance processes was a decision made by NT DoE in the second school semester of 2013 to ‘concentrate’ the efforts of its SATOs (for both SEAM and *Every Child, Every Day* (ECED)⁴¹) on particular schools and/or certain communities. NT DoE advised that it had decided to focus the efforts of its SATOs in an attempt to reach a ‘critical mass’ within those schools or communities, in an effort to improve the outcomes achieved, and the sustainability of those outcomes. This ‘concentration’ of SATO efforts appeared to have an impact on the distribution of conferences across schools. For example, 48 per cent of the 331 children subject to compulsory conferences held during 2013 were enrolled at just five schools (out of a total of 23 schools subject to SEAM following the rollout of Phase 2). NT DoE also sought to limit the numbers of students each SATO managed to around 40 children per term.⁴²

3.12 The availability of (or SATOs’ perceptions of the availability of) Social Workers also affected the selection of children. In larger communities the availability of Social Workers for conferences was reportedly significantly

40 There were a range of concerns raised by SATOs, Social Workers and schools themselves about the school’s ability to integrate some children back into the school environment, and provide ‘catch-up’ assistance if those children were to return to attending school regularly.

41 In April 2014, NT DoE advised that there were 36 SATOs working across the NT, of which 19 operated in SEAM sites. Refer to paragraph 1.15 for information on ECED.

42 PM&C advised that while it was not consulted on a specific number of cases, there was a mutual understanding between the departments that SATOs would liaise with schools to determine their caseload in order to ensure a suitable approach to SEAM activity, given that in some communities, there would be a large number of children with 10 or more unauthorised absences in-scope for SEAM.

better than in remote communities.⁴³ DHS advised that it was funded for Social Workers to make 10 trips per year to each remote SEAM community. SATOs on the other hand, often visited the remote communities more frequently, or even lived in the community. As a result, SATOs advised that there were limited days each term in which they could schedule conferences with Social Workers in remote communities. SATOs also advised that they had, on occasion, elected to put parents who were in-scope for SEAM through ECED instead, to ensure that the student's attendance issues were afforded attention in a timely manner.

The numbers of children subject to SEAM with low school attendance levels

3.13 A total of 2411 children in SEAM communities were identified by NT DoE as having recorded 10 or more unauthorised absences over the 10 weeks, at some point during 2013.⁴⁴ Applying DHS' estimate that around 55 per cent of parents in SEAM communities are in-scope for SEAM, the ANAO estimates that parents of over 1300 children should have been subjected to SEAM attendance processes in 2013 (following the rollout of SEAM to Phase One and Two communities).⁴⁵ However, as at the end of 2013 only 331 children (around one quarter of the 1300 children) were the subject of a compulsory conference.⁴⁶

3.14 There are several potential factors that may have contributed to the relatively low numbers of conferences held. PM&C has advised that in part the low number of conferences may be due to the following issues:

-
- 43 PM&C advised that in some cases where there is a permanent Social Worker presence in a community (such as Alice Springs) only 30 per cent of Social Workers' time allocated for SEAM is being used for conferences.
 - 44 Each month, NT DoE provided a list to DHS of all children who are enrolled in SEAM schools and who had recorded 10 or more absences over the previous 10 weeks (including all children attending the school, not just those whose parents are in-scope for SEAM). Across all of the monthly reports, a total of 2411 children were included in one or more of the reports. DHS' analysis of the reports shows a consistently significant proportion of individual students in SEAM schools being identified in consecutive reports (well in excess of half each month).
 - 45 The number of parents which should be subjected to SEAM attendance processes will likely increase following the continued rollout of SEAM to Phase Three and Four communities.
 - 46 Early results in improving the numbers of parents and children subject to attendance processes are promising—NT DoE recorded that 162 compulsory conferences were conducted in the first school term in 2014. NT DoE advised that, in the context of very remote communities and a highly mobile population, it is important to recognise activity undertaken by SATOs in the lead up to conferences being held. This activity includes: liaising with schools to review case files; confirming a child's identity; scope checks; validating attendance data; locating the family; and attempting to deliver compulsory conference notices. For example, NT DoE advised it had made 404 failed attempts to deliver notices in the first school term in 2014.

- the delay in the signing of the Schooling Implementation Plan impacted NT DoE’s recruitment, training and deployment of SATOs; and
- at a community level, there have been significant safety issues, as well as deaths in communities and weather events which have impeded SEAM activity.

3.15 However, other factors may include that the attendance processes require more time and effort than was originally envisaged; that there is insufficient resources to apply SEAM to all children who meet the criteria; or that in the early stages of SEAM’s rollout, processes had not yet reached full capacity. PM&C advised that it continues to monitor the number of conferences conducted under SEAM which is lower than expected.

3.16 Overall, while allowing local flexibility in delivery approaches can be effective, there is a risk that if the attendance element is inconsistently or narrowly applied, the effectiveness of SEAM will be undermined.⁴⁷ In discussions with the ANAO, DHS and NT DoE staff in the NT emphasised that SEAM needed to be swiftly and consistently applied to ensure that the threat of payment suspension is sustained over time, as this could drive longer-term behavioural change in school attendance. Furthermore, SATOs and Social Workers advised the ANAO that they have received complaints from parents who were subject to SEAM about being unfairly targeted under the measure.

3.17 An important characteristic of SEAM is that funding was allocated under the ten year SFNT National Partnership, in part in recognition of the challenging nature of the objectives of the partnership.⁴⁸ However in establishing SEAM, the then DEEWR did not develop a strategy for prioritising children for assistance under the attendance element of the measure. As a result, it has been left largely to NT DoE to manage the disparity between the numbers of children with low school attendance, and SEAM’s capacity to action those children.

47 Two key issues identified in the trial was that the potential threat of suspension of a parent’s payments had the most impact on school attendance, but that a relapse to poor attendance levels was commonly observed following the completion of compliance periods. See Appendix 2 for further discussion on these issues.

48 The former Minister of FaHCSIA stated: ‘We have made this commitment over ten years to give Aboriginal people and communities certainty that the Australian Government is there for the long term and because we recognise that the levels of disadvantage too many people in the Northern Territory face remain too high.’ Department of Families, Housing, Community Services and Indigenous Affairs, *Stronger Futures in the Northern Territory: a ten year commitment to Aboriginal people in the Northern Territory*, FaHCSIA, Canberra, 2012, p. 1.

3.18 To improve the consistency of the application of attendance processes, and to seek to maximise and sustain its impact, there is scope to develop a clearer approach to the targeting of SEAM resources. Such an approach should be informed by a sound understanding of SEAM's current capacity, consideration of opportunities to improve that capacity, and consideration of SEAM's place within broader school attendance policy—particularly with the new Remote School Attendance Strategy operating alongside SEAM in a number of NT schools and communities.

Recommendation No.1

3.19 To improve the consistency of the application of SEAM processes aimed at improving school attendance levels, and to seek to maximise and sustain their impact, the ANAO recommends that, in consultation with the Northern Territory Department of Education and the Department of Human Services, the Department of the Prime Minister and Cabinet:

- assess SEAM's current capacity to address all children who meet the criteria of the attendance element, in a timely manner; and
- develop a clearer approach to target SEAM resources so as to improve the number of children that can be afforded attention.

PM&C response:

3.20 *Agreed. In April 2014, PM&C held a Bilateral Meeting with the Northern Territory Government to assess SEAM's capacity to address the attendance of all children in a timely manner and to develop a clearer approach for targeting SEAM resources. PM&C will continue to work in collaboration with the Northern Territory Government and the Department of Human Services to improve the consistency and application of SEAM.*

DHS response:

3.21 *Agreed. The Department of Human Services will work closely with both the Department of the Prime Minister and Cabinet and the Northern Territory Department of Education to progress the recommendation.*

NT DoE response:

3.22 *The Northern Territory Department of Education is fully supportive of the recommendation and looks forward to further collaboration with Australian Government agencies to improve SEAM's effectiveness through strengthening key aspects of service delivery and performance reporting arrangements.*

Confirming children are in-scope for SEAM

3.23 When schools and SATOs identify children with low school attendance, they do not know at that point whether the child's parents are in receipt of welfare payments. As a result, SATOs need to check if the parent is in-scope for SEAM, before delivering a conference notice to that parent. If subsequent steps of the attendance process are progressed, the SATO will have to re-confirm that the parent remains in-scope, at each additional step.

3.24 Prior to December 2013, to conduct a scope check SATOs submitted five items of information into a DHS system.⁴⁹ If all five items sufficiently matched DHS' records, the SATO could progress SEAM activities.⁵⁰ If no match was made, but a SATO believed that different information was recorded for the parent or child in DHS' system, SATOs could request that DHS manually search its systems. While the manual checks were generally very timely, the significant numbers of children requiring the manual process caused some delays in the attendance process. DHS advised that the 'complexity of naming and spellings in remote Indigenous communities' impacted on the success of matching, and that it had provided further training to SATOs. DHS also advised that in December 2013 the process was enhanced to increase the success rate of scope checks.⁵¹

3.25 SATOs and Social Workers reported to the ANAO that some parents may have attempted to avoid SEAM processes by changing their nominated DHS address to a non-SEAM community and/or changing the nominated carer of a school-age child to another family member who was not receiving a schooling requirement payment.⁵² In April 2014, PM&C advised that the department had sought legal advice on the application of the *Social Security*

49 The five items were the child's surname, date of birth, the school identification number, gender, and the parent's name.

50 DHS advised that there does not need to be an exact match as the system was designed to apply a certain degree of 'fuzzy' logic when comparing the data provided to what is stored in the DHS system.

51 DHS advised that SATOs are now required to enter only the four pieces of information relating to the child. If a match is made for a child, the SATO is able to select the relevant parent and proceed with the attendance process.

52 One school advised the ANAO that a large group of students had chosen to enrol at another school in the same community because it was believed that that school had lower attendance expectations.

(Administration) Act 1999 and had developed operational policies to address these issues.⁵³

Delivering conference notices and scheduling conferences

3.26 Once a parent is confirmed as being in-scope for SEAM, SATOs may provide the parent with a conference notice. The notice requires the parent's presence at a compulsory conference to discuss their child's school attendance and agree to improve attendance under a school attendance plan.⁵⁴ The conference notice is hand delivered by the SATO to the parent, typically on the day of, or a day before the compulsory conference.⁵⁵ SATOs advised that locating parents was often challenging, and could require numerous attempts which delayed the start of the attendance process.

3.27 SATOs and DHS staff raised a number of options with the ANAO to assist SATOs in locating parents, and noted these options were discussed by the relevant departments during 2013.⁵⁶ DHS advised that it had obtained legal advice in December 2013 in relation to the authorised disclosure of information to ensure a child is enrolled or attending school as required under a State or Territory law. On the basis of this advice, and with the agreement of PM&C and NT DoE, a process was introduced to provide for ad hoc requests for customer information, primarily address details, to be provided by DHS.

3.28 Attendance at compulsory conferences includes a SATO and parents and, wherever possible, a DHS Social Worker. The child may also attend, and if appropriate, other support workers or relevant school staff. Both SATOs and Social Workers advised the ANAO that they had found scheduling conferences to be at times challenging (see for example paragraph 3.12). DHS and NT DoE advised that both departments are working together to continue to refine processes to improve the scheduling of compulsory conferences.

53 PM&C also advised that it is aware that some parents may move out of scope for a variety of reasons, including avoiding SEAM activity, but does not have relevant data on this. PM&C expected that if parents move out of scope of SEAM and have ongoing attendance issues, NT DoE would engage these parents in the ECED process.

54 Specifically, the *Social Security (Administration) Act 1999* (Cth) and the *Social Security (Administration) (Schooling Requirements—Person Responsible) Specification 2012* (Cth).

55 SATOs advised that the short period of time between delivering the notice and the conference was designed to maximise the likelihood that the parent will attend the conference.

56 For example, these options include: the provision of DHS's customer address information to SATOs; the option of mailing a conference notice to the parent; and having the option to progress the suspension of payments after a certain number of attempts to locate and/or contact the parent.

Compulsory conferences and school attendance plans

3.29 Compulsory conferences involve a SATO, Social Worker and parents discussing the issues faced in getting the child to attend regularly, and strategies and actions to improve the child's attendance. At the end of the conference, key aspects of the discussion are recorded into the school attendance plan, which is signed by the SATO and parents. The following textbox details the most common barriers to school attendance, as described to the ANAO by SATOs and Social Workers.

Common 'barriers' to school attendance encountered under SEAM

Parental authority and/or parenting skills: A lack of parental authority and/or parenting skills was a common barrier to school attendance identified by SATOs and Social Workers. In relation to the lack of parental authority, it was commonly reported that many parents simply allowed children to choose whether or not to attend school. However, difficulties for parents in exercising their parental authority were also acknowledged. One such difficulty arose where school-age males had completed 'initiation ceremonies', and as such were considered to be free to make their own decisions (and often chose not to attend school). In relation to the lack of parental skills, SATOs and Social Workers advised that parents often wished for their children to attend school, but had been unable to convince them to regularly attend.

Transportation issues: The ANAO was also advised that transportation issues were a common barrier to school attendance. These issues ranged from a lack of willingness of parents to drive or walk their children to school, through to challenges associated with significant distances, a lack of means, and weather conditions. In some communities it was reported that previously available bus services (often provided by schools) had ceased, negatively impacting on attendance.

Bullying and teasing: Bullying and teasing were other barriers commonly identified. Matters described by parents as bullying or teasing varied significantly from relatively minor events, to incidents of physical assault (sometimes linked to broader violence or conflict within the community). There were also reports of parents and children being reluctant to disclose bullying because of fear of retribution from other families.

Other: A number of broader matters were also frequently identified as impacting on school attendance. These included overcrowded housing, domestic violence, alcohol and substance abuse, and gambling. In relation to their impacts on school attendance, these issues were often associated with significant overnight disturbance which affected sleeping patterns and caused children and/or parents to sleep in and miss school (or the bus to get to school). Deaths in communities were also frequently identified by SATOs and Social Workers as impacting on school attendance.

3.30 The benchmark for improvement specified in attendance plans was that students were required to attend school every day, unless an appropriate reason was provided. While the requirement to attend school every day (100 per cent attendance) reflects the compulsory nature of schooling, some SATOs and Social Workers considered that in the context of very low

attendance levels, a 100 per cent requirement could set parents up to 'fail'. SATOs and Social Workers advised that some SATOs had verbally advised parents that 'reasonable' improvements in attendance would be sufficient to avoid a suspension. However such verbal advice introduces a risk of 'mixed messages', and may undermine a later payment suspension decision.

3.31 Where a tangible sanction is involved, consistent interpretations are important. For example while the requirement for 100 per cent attendance is unambiguous, the purpose of attendance plans is described as being to ensure 'improved school attendance'⁵⁷ or 'encourage adequate attendance'.⁵⁸ Furthermore while the attendance plans effectively require 100 per cent attendance, the NT Government's ECED program has a benchmark of 90 per cent. PM&C and NT DoE advised that attendance plan guidelines and a revised attendance plan template were under development in April 2014.⁵⁹

Possible suspension of payments under the attendance element

3.32 Once an attendance plan is agreed, the SATO is responsible for monitoring the parent's compliance with the plan. If parents are subsequently deemed to have complied with the plan, then no further action is required. However, parents can be deemed non-compliant, for any of the following reasons:

- not attending the conference as required; or
- attending the conference, but not entering into an attendance plan; or
- attending the conference, entering into a plan but subsequently not complying with an attendance plan.

3.33 If the SATO determines that parents have not complied with these requirements, the SATO advises DHS, and a compliance notice will be issued to a parent. If the SATO subsequently determines that a parent has not

57 The Act states that an attendance plan: 'must contain requirements... that the notifier considers appropriate for the purpose of ensuring improved school attendance of the one or more children covered by the plan.' *Social Security (Administration) Act 1999* (Cth) s. 124NC(7).

58 The *Social Security (Administration) (Schooling Requirement) Determination 2009* (No. 1) (Cth) defines an attendance plan as: an arrangement 'entered into between the person and a [SATO]... that identifies actions to be taken or strategies to be employed in order to encourage adequate attendance at school by the child.'

59 PM&C further advised that NT DoE guidance states: 'if the required actions in the plan are achieved or there is significant improvement in attendance after 10 school days the SATO will record compliance.'

complied with a compliance notice, the SATO is to advise DHS. Before a payment suspension is applied, DHS considers whether any special circumstances exist for the parents or child. Suspended payments can be restored, with full back-pay, if the SATO advises DHS that a parent has subsequently conformed. However, if payments are suspended for a total of 13 weeks or more, DHS may cancel the payments.

Monitoring school attendance plans

3.34 The SATO will monitor the plan for as long as the SATO determines is necessary.⁶⁰ The ANAO observed that the duration of attendance plans varied significantly between SATOs. Some SATOs finalised SEAM ‘cases’ reasonably quickly, and if attendance was ‘significantly’ improved over two or three weeks, then parents would be deemed compliant, and the SATO would cease monitoring. However, other SATOs maintained longer monitoring periods, as there was a tendency for attendance levels to fall away after the initial few weeks following a conference or compliance notice. PM&C advised that NT DoE guidance states that the monitoring period for the plan is for a minimum of 10 school days.⁶¹

2013 compliance—attendance element

3.35 The numbers of activities which have occurred under the attendance element of SEAM during the course of 2013 are provided in Table 3.2.

60 There was variability in the level of contact with parents that SATOs made while monitoring attendance plans. Some SATOs periodically contacted parents to demonstrate that they were continuously monitoring the child’s attendance and provide feedback or recognition of success. There may be benefit in exploring the impacts of different monitoring approaches, for example to ascertain whether the additional effort made by some SATOs yields improved or more sustained outcomes.

61 PM&C further advised that in practice, SATOs will use their discretion as to how long they will monitor certain cases, knowing that for many parents, the minimum 10 school days is not a long enough period to display a sustained improvement in their child’s attendance. Longer monitoring periods are also more likely to occur in remote communities where SATOs may not have a permanent monitoring presence in the community.

Table 3.2: Number of SEAM activities under the attendance element, 2013 (Phase One and Two communities)

Description	Count	
No. of parents and children <i>potentially</i> in-scope for SEAM (receiving income support payments, living and attending school in a SEAM site, but not necessarily with low attendance)	Parents	2001
	Children	3441
No. of children of parents in-scope for SEAM, with low school attendance levels	Children	Approx. 1300 (estimate)
No. of compulsory conference notices (476 notices issued)	Parents	276
	Children	369
No. of compulsory conferences (348 events)	Parents	254
	Children	331
No. of compliance notices (177 notices issued)	Parents	127
	Children	154
No. of payment suspensions applied (65 events)	Parents	60
	Children	70
No. of special circumstance determinations applied ¹ (23 events)	Parents	15
	Children	29
No. of payment cancellations applied ²	Parents	1

Source: ANAO, from DHS SEAM reporting.

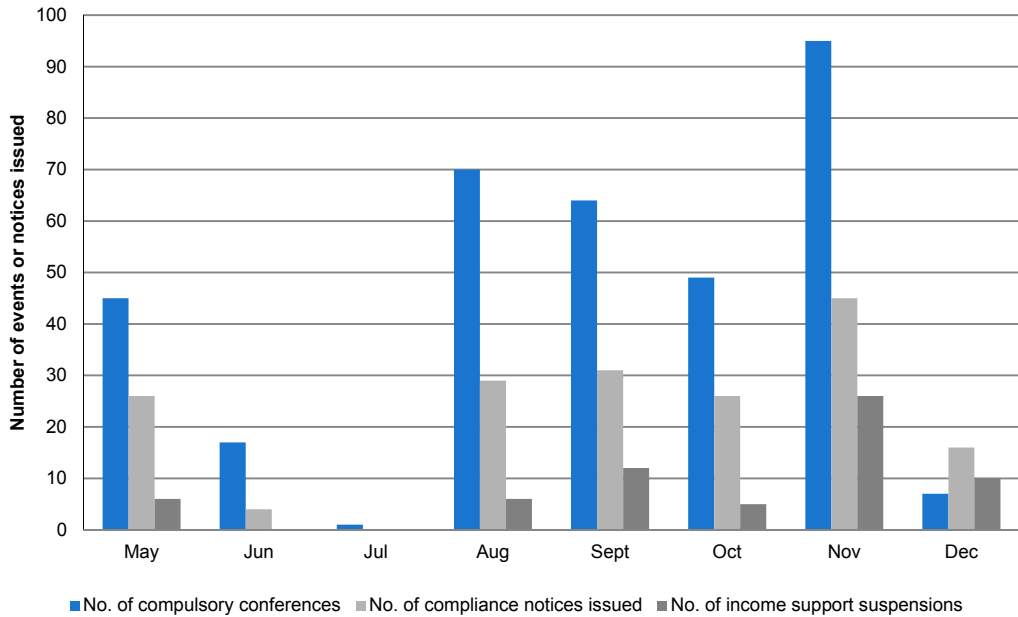
Note 1: Of the parents who SATOs had advised DHS of non-compliance with a compliance notice, 21 per cent were determined by DHS to have special circumstances. A key finding of the SEAM trial was that a high proportion of parents were granted an exemption from a payment suspension. The proportion of parents exempted during 2013 under the attendance element was significantly lower than during the trial.

Note 2: DHS advised that the cancellation: 'incorrectly occurred due to an IT system error. The error was identified and the parent's payment restored. There have therefore been no SEAM attendance cancellations which have occurred as a result of 13 weeks of SEAM suspension.'

3.36 As discussed in paragraph 1.22, while SEAM may apply to parents of any background, the SEAM communities all have a high proportion of residents who are Indigenous Australians. DHS advised that in 2013, 98 per cent of parents who attended a compulsory conference had identified as Indigenous.

3.37 The numbers of compulsory conferences held, compliance notices issued, and payment suspensions applied each month from May to December 2013 is shown in Figure 3.2. As can be observed, the majority of compulsory conferences were conducted between August and November 2013, peaking at 95 conferences conducted in November. The conduct of more than a quarter of all conferences held in 2013 in November alone suggests that a significant increase in the numbers of conferences held in 2014 is achievable.

Figure 3.2: Numbers of compulsory conferences, compliance notices and payment suspensions, 2013 (Phase One and Two communities)

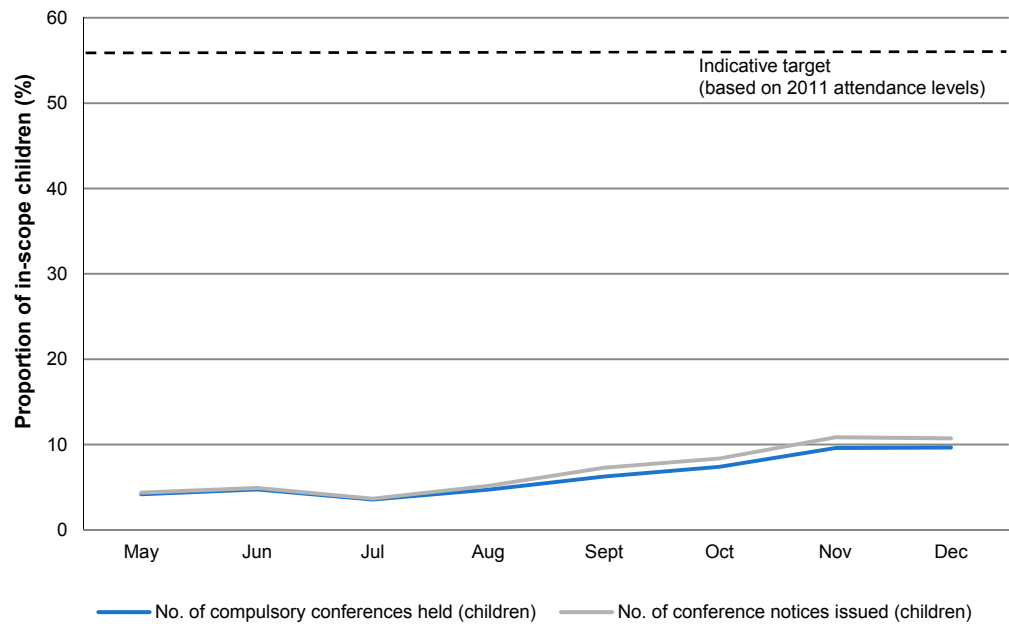


Source: ANAO, from DHS SEAM reporting.

Note: While SEAM commenced rolling out in March 2013, full data extraction did not commence until May 2013. The rollout of SEAM to Phase Two communities commenced from July 2013.

3.38 The cumulative number of children actioned under the SEAM attendance element; that is, the proportion of children whose parents were issued conference notices and attended a conference is shown in Figure 3.3. While the cumulative proportion of children subject to attendance processes grew during 2013, overall it remained at relatively modest levels (around 10 per cent).

Figure 3.3: The cumulative proportion of children actioned under the SEAM attendance element, 2013 (Phase One and Two communities)



Source: ANAO, from DHS data and program assurance reporting.

Note: The proportion of in-scope children actioned under SEAM would not be expected to reach 100 per cent as not all of these children have low attendance rates. NT schooling data for 2011 for SEAM communities indicated that 56 per cent of children in SEAM communities had less than 80 per cent attendance rates.

3.39 In relation to the timeliness of the attendance element in 2013, in general the processes under the attendance element are lengthier than those under the enrolment element. It is important to note that while it can take months to suspend parents; this typically reflects situations in which a SATO monitored the student’s attendance over the course of a number of weeks or months. However, the time between a child accruing their tenth unauthorised absence and a SATO commencing the SEAM attendance process (by delivering a conference notice) is not currently monitored. Obtaining information on the speed at which children with low school attendance are afforded attention is a key area for consideration. Monitoring arrangements are discussed further in Chapter 4.

ANAO sample of attendance processes

3.40 The ANAO examined DHS customer records for a sample of 31 parents subject to SEAM attendance processes. The targeted sample included instances

in which: compliance notices were issued to parents; a Social Worker had not attended the compulsory conference; special circumstances had been determined; and where a parent's payments had been suspended or cancelled.

3.41 Of the 348 compulsory conferences held throughout 2013, DHS Social Workers attended all but seven. While a Social Worker's attendance at a conference is strongly encouraged, it is not a mandatory requirement. Following conferences, the notes of Social Workers demonstrated a significant level of support was often directly provided to parents, and Social Workers and SATOs often kept in regular contact regarding the parent's circumstances.⁶²

3.42 Overall, the ANAO's review indicated that processes were generally well managed given the complex environment. This environment involves Australian Government and Territory staff working together, multiple forms of compliance and non-compliance, and the often significantly complex and dynamic circumstances of parents and children subject to SEAM. The ANAO identified two instances in which correct processing had not occurred, but both cases were quickly rectified by DHS.⁶³

Conclusion

3.43 Encouraging children to regularly attend school in SEAM communities has long presented a challenge. The 'barriers' to regular attendance reported by staff working on SEAM are varied, often complex, and at times deeply entrenched. For the overwhelming majority of parents who participated in a compulsory conference, social work support was provided by DHS to assist them in improving their child's attendance. Throughout 2013, a relatively low proportion of parents had their payments suspended by DHS for failing to take sufficient action to improve their child's school attendance. As with the enrolment element, DHS generally applied attendance processes and payment decisions appropriately, in a complex environment.

3.44 An estimated 1300 children of in-scope parents were identified as having low school attendance, and as such, should have been afforded

62 The ANAO also reviewed records for six parents who had had a special circumstance determination applied to them or their child. In all cases, the reasons for the determinations aligned with those prescribed under SEAM legislation. Further, Social Workers had regularly contacted the parents to determine if the exemption remained relevant.

63 See also Note 2 under Table 3.2, in which DHS advised the ANAO of the incorrect cancellation of a parent's payments.

attention under the attendance element. However, SEAM was applied inconsistently or narrowly in 2013; with only one quarter of these children (331) being the subject of a compulsory conference.⁶⁴ To seek to maximise and sustain SEAM's impact, the ANAO has recommended that PM&C in consultation with DHS and NT DoE assess SEAM's current capacity, explore opportunities to improve that capacity, and develop an agreed approach to target SEAM resources. PM&C advised in April 2014 that NT DoE and DHS had commenced negotiations for a service level agreement with the aim of addressing servicing and capacity issues experienced in the first year of SEAM's operation. While a service level agreement may address service delivery deficiencies, it is important that an overall strategy is developed to determine how SEAM resources are best targeted to achieve the program's objectives.

64 Early results in improving the numbers of parents and children subject to attendance processes are promising—NT DoE recorded that 162 compulsory conferences were conducted in the first school term in 2014.

4. Monitoring and Reporting on SEAM's Operation and Effectiveness

This chapter examines the activities undertaken by PM&C and DHS to monitor and report on SEAM's operation and effectiveness.

Introduction

4.1 Reporting on performance provides entity managers with information to enable assessments to be made about progress towards program objectives; and can indicate areas that may require further management attention. In relation to SEAM, performance reporting arrangements would need to encompass monitoring the delivery of activities and involvement of the target group. However as the intent of SEAM is to introduce behaviour changes, reporting arrangements would also need to enable assessment of the impact of key SEAM strategies, in both the medium and long term.

4.2 To assess the effectiveness of monitoring and reporting on SEAM's operation and effectiveness, the ANAO examined the activities undertaken to:

- monitor SEAM's implementation;
- report on SEAM's performance; and
- measure and evaluate SEAM's performance and effectiveness.

Monitoring SEAM's implementation

4.3 A number of monitoring activities are currently implemented for SEAM, including regular reporting by DHS on enrolment and attendance activities and regular reports by NT DoE to DHS and PM&C on school attendance. In addition to these activities, DEEWR and PM&C conducted a review of SEAM processes in September 2013. This review covered issues including the use of interpreters, communication activities, the role of Social Workers, legal issues, governance, attendance plans, compliance matters, SEAM cycles, and appeals.

4.4 To monitor SEAM activities DHS prepares a range of reports, typically weekly, which provide information on activities occurring under the SEAM enrolment and attendance elements. For example, these reports provide information on the numbers and dates of SEAM notices and compulsory conferences; and also the outcomes of those activities, such as payment

suspensions. These reports are used by DHS to monitor its delivery of SEAM activities. De-identified versions of these reports are also provided to PM&C.

4.5 To enable the monitoring of attendance, NT DoE provides a monthly list to DHS of all children enrolled in SEAM schools who had recorded 10 or more absences over the previous 10 weeks (including all children attending the school, not just those whose parents are in-scope for SEAM). With SEAM rolled out to Phase One communities in the first semester of 2013, the reports each contained around 500 to 700 children. Following SEAM's Phase Two rollout from July 2013, the reports contained approximately 1600 children.

4.6 During the SEAM trial, which ran from 2009 to 2012, a number of different methods of referral of students were implemented; each of which presented challenges in the number of children identified for attention.⁶⁵ However, a mechanism to monitor the proportion of children with low attendance levels afforded attention under SEAM, a key element of the program's success, was not established at the time of this audit.⁶⁶ While NT DoE's monthly attendance reporting provides insight into the number of children in SEAM communities with poor school attendance, this information had not been compared to SEAM activity levels. As a result, the department has been unable to determine how many of the children identified in NT DoE's reports were subject to SEAM, nor how many of these children were being afforded attention under the attendance element.

4.7 The ANAO's analysis of NT DoE's reports identified a total of 2411 individual children in the nine monthly reports (from April to December 2013). For the purpose of SEAM budgeting, DHS estimated that 55 per cent of parents of children in SEAM communities would be in-scope for SEAM. Using this assumption, there were approximately 1300 children in SEAM communities during 2013 with low school attendance, and whose parent was in-scope. Ideally, for all of these children, their parents would be afforded attention under the attendance element of SEAM. However, only one quarter of these children (331) were the subject of a compulsory conference in 2013, as noted in paragraph 3.13.

65 See Appendix 2 for further discussion.

66 While DEEWR's risk management plans included a broad range of risks, the plans did not identify risks associated with having sufficient resources to apply SEAM processes to all relevant children with low school attendance levels.

4.8 While current monitoring activities provide relevant information on activity levels, there is scope to realise the full potential of the regular reporting, particularly to monitor the degree to which all children with low school attendance are afforded attention under SEAM. PM&C advised in April 2014 that it was actively using data from NT DoE and DHS to assess and monitor SEAM activity and performance. PM&C noted that there were gaps in available data, and that it was working with NT DoE and DHS to identify possible options to address these gaps.

External reporting on SEAM's performance

4.9 External performance reporting informs stakeholders about program performance. Entity annual reports are a key vehicle for reporting program performance to the Government, the Parliament and the public, although additional avenues are open to entities to provide public information including through for example their websites.

4.10 In the former DEEWR's 2012–13 Annual Report, information about the commencement of the rollout of SEAM was provided as part of discussion about the SFNT National Partnership.⁶⁷ Under the SFNT National Partnership, the Australian Government is to prepare a performance report every six months. As at May 2014, two such reports have been prepared, spanning the last six months of 2012 and the first half of 2013. The reports included information on why SEAM was considered important, and what had been achieved by mid-2013 (including the conduct of information sessions, the rollout of SEAM in a number of communities and the first conferences being held).⁶⁸

4.11 PM&C advised the ANAO that it was considering a range of possibilities for additional public reporting on SEAM. These included the release of monthly school attendance rates (likely by NT DoE and on their website) and also information about SEAM activity. Such reporting would significantly improve the level of information available to the public.

67 SEAM was also noted in DEEWR's 2013–14 Portfolio Budget Statements, but as these statements were finalised around the time of SEAM's commencement, little information was available to report. DEEWR 2013, *Annual Report 2012-13*, DEEWR, Canberra, p. 35.

68 Australian Government, *Stronger Futures in the Northern Territory: Six-Monthly Progress Report—1 July 2012 to 31 December 2012*, Australian Government, Canberra, 2013. Australian Government, *Stronger Futures in the Northern Territory: Six-Monthly Progress Report—1 January 2013 to 30 June 2013*, Australian Government, Canberra, 2014.

Measuring SEAM's performance

4.12 Measuring performance is important to help entities review progress against objectives, and where necessary adjust policy settings or delivery approaches to achieve improved outcomes. While evaluation often seeks to offer insight into a program's performance, it can be some time before sufficient data is available to assess impact or an evaluation is complete. As such, it is important to establish a range of appropriate performance measures to monitor SEAM over its ten-year life, to gain insight into whether its objectives are being achieved. The use of proxy indicators is helpful in situations where direct measurement is difficult.

4.13 A 'program logic', or the way in which SEAM is to contribute to the achievement of the outcomes and objectives of the SFNT National Partnership is outlined in the Schooling Implementation Plan agreed between the Australian and NT governments. The following outputs, outcomes and reform objectives are listed for SEAM:

Outputs: Increasing enrolment and attendance and promoting greater responsibility among parents for ensuring their children go to school.

Outcomes: Improved school readiness, attendance and attainment of students in remote schools (focus: attendance [at SEAM schools]).

Reform Objectives: Improvement in the number of children of in-scope parents attending school each day and the number of children of in-scope parents enrolled in school.⁶⁹

4.14 Considering performance information requirements early in the implementation of an initiative can support its subsequent monitoring and evaluation. In this respect, it is important to design performance information collection activities appropriately. For example, and as discussed in paragraph 2.20, within the enrolment element information is not collected on whether or not a child was already enrolled in school before SEAM activity, or if the enrolment processes encouraged parents to enrol their child. Under the current arrangements it is possible that a significant proportion of the activity under the enrolment element is simply requiring parents who had already enrolled their children to contact DHS. As a result, whether SEAM has stimulated an increase in enrolment, which is its purpose, is not readily

69 COAG, *Schooling Implementation Plan. National Partnership Agreement on Stronger Futures in the Northern Territory*, (signed March 2013), Australian Government, Canberra, p. 7.

identifiable. In much the same way, whether the attendance element is stimulating an increase in school attendance levels is also not currently identifiable.

4.15 In 2012, DEEWR had commenced work on a performance reporting framework, but this was not finalised prior to the transfer of the program to PM&C in 2013. In relation to SEAM's performance, PM&C's (and prior to September 2013 DEEWR's) primary focus throughout 2013 was ensuring that the program was rolled out to communities in line with the phased schedule. The finalisation of a performance reporting framework would provide PM&C, as the department now responsible for SEAM, insight into SEAM's effectiveness. This would involve the establishment of relevant performance measures that demonstrate the extent of progress against program objectives. For SEAM, these measures could include direct performance measures, such as improvements in attendance levels over time. Proxy measures could also be used to demonstrate performance particularly as there is a lag between SEAM outputs (or deliverables) and any demonstrable improvement in expected outcomes of improved school readiness and school attainment.⁷⁰

4.16 Although approaches to assessing the impact of SEAM requires further development, SATOs, Social Workers and school officials interviewed by the ANAO attributed a number of individual improvements (at least in the short term) to the operation of SEAM. This included the enrolment of children at schools which may have been previously unaware of the child's presence in or around the community; and significant improvements in individual students' attendance levels. Social Workers also reported positive early results with some families.

4.17 In April 2014, PM&C acknowledged that SEAM's current performance reporting measures have limitations. PM&C advised that it intended to work with NT DoE and DHS to develop an enhanced performance framework, noting that this would require agreement from NT DoE and DHS to provide richer and more detailed performance data.

70 For further information, refer to ANAO Report No. 21, 2013–14, *Pilot Project to Audit Key Performance Indicators*, pp. 74–75.

Evaluating SEAM

4.18 It is generally prudent to finalise evaluation needs from the outset, particularly to ensure that relevant baseline information is recorded before the measure commences, and that the information required is collected in an efficient manner. As part of the SEAM trial, the former DEEWR developed an evaluation strategy involving three evaluations of the implementation, progress and effectiveness of the trial. A final evaluation report of the SEAM trial (which is to be completed in 2014) will draw upon a range of data sources and methodologies to determine program effectiveness. The draft report shows no statistically significant improvements in attendance in NT government schools. However, some small impacts were observed in vulnerable children due to Social Work intervention.

4.19 Under the SFNT National Partnership, the Australian and NT governments share responsibility for conducting evaluations of its various initiatives including the new SEAM model. The funding for SEAM included provision for an estimated \$2 million for evaluation purposes. This funding had been estimated on the assumption that four evaluation reports would be conducted over the course of the ten year life of SEAM, with approximately one evaluation conducted every two to three years.

4.20 In April 2014, PM&C advised the ANAO that it expected to undertake the first of these evaluations commencing in 2014. The evaluation offers an opportunity to examine elements of SEAM's design and operation highlighted in this audit and may also consider the question of whether value for money is achieved under the program. While these evaluations are separate to those of the SEAM trial, the findings are likely to be relevant to the future evaluations, and could be used to provide a baseline for the assessment of the impact of the new model.

4.21 For SEAM, key considerations in assessing value for money would include the funding allocated to SEAM, and the increased costs associated with direct service provision to families in remote communities. A comprehensive assessment would also involve consideration of the costs of the outcomes directly and indirectly⁷¹ achieved under SEAM, for example improvements in

71 SEAM could have broader demonstration effects; that is, some parents could be motivated to enrol their child or improve their child's attendance, as a result of becoming aware of SEAM's application in their community and its potential consequences.

the numbers of children enrolled in, and regularly attending school against other initiatives to improve attendance.

Conclusion

4.22 Ideally, performance measurement arrangements are developed at the commencement of an initiative to allow for the establishment of baseline information and consideration of performance information needs. PM&C's ability to assess SEAM's effectiveness and identify areas to improve efficiency of delivery is constrained by the limited performance measures established prior to the transfer of SEAM to the department. The department's ability to provide advice to government on the program's success, and to inform policy considerations, is also constrained. SEAM is planned to be in operation until 2022 and in this context finalising a performance reporting approach with appropriate performance measures including proxy measures where necessary, would be a priority.

4.23 While some anecdotal evidence was provided to the ANAO that SEAM in the NT is having some positive effects, it will be important for PM&C to finalise the development (commenced by the former DEEWR), of an appropriate performance measurement approach so as to be able to more firmly establish the impact of the measure. In April 2014, PM&C acknowledged that SEAM's existing performance reporting measures had limitations. PM&C advised that it intended to work with NT DoE and DHS to develop an enhanced performance framework, noting that this would require agreement from NT DoE and DHS to provide richer and more detailed performance data. The proposed evaluation of SEAM, which PM&C advised it intends to commence in 2014, would form a key element of this framework, and build upon the evaluations of the SEAM trial.



Ian McPhee
Auditor-General

Canberra ACT

25 June 2014

Appendices

Appendix 1: Agency responses



Australian Government
Department of the Prime Minister and Cabinet

Ref: EB14/622

Dr Andrew Pope
Group Executive Director
Australian National Audit Office
GPO Box 707
CANBERRA ACT 2601

Dear Dr Pope

Thank you for the opportunity to formally comment on the proposed Australian National Audit Office (ANAO) audit report on the Improving School Enrolment and Attendance through Welfare Reform Measure (SEAM).

The Department of the Prime Minister and Cabinet agrees with the ANAO's recommendation and will work in collaboration with the Northern Territory Government and the Department of Human Services to improve the consistency and application of SEAM.

Attachment A to this letter provides a summary of our overall response to the proposed audit report and to the ANAO recommendation for inclusion in the report Summary.

If you would like to discuss the department's response, please do not hesitate to contact Mark Laduzko on 02 6240 9376.

Yours sincerely

A handwritten signature in cursive script, appearing to read 'RM Cross'.

Rebecca Cross
Acting Secretary
10 June 2014

Postal Address: PO BOX 6500, CANBERRA ACT 2600
Telephone: +61 2 6271 5111 Fax: +61 2 6271 5414 www.pmc.gov.au ABN: 18 108 001 191

Response to the ANAO performance audit of the Improving School Enrolment and Attendance through Welfare Reform Measure (SEAM).

Recommendation No.1

To improve the consistency of the application of SEAM processes aimed at improving school attendance levels, and to seek to maximise and sustain their impact, the ANAO recommends that, in consultation with the Northern Territory Department of Education and the Department of Human Services, the Department of the Prime Minister and Cabinet (PM&C):

- assess SEAM's current capacity to address all children who meet the criteria of attendance element, in a timely manner;
- develop a clearer approach to target SEAM resources to achieve its objectives.

PM&C's response:

Agreed. In April 2014, PM&C held a Bilateral Meeting with the Northern Territory Government to assess SEAM's capacity to address the attendance of all children in a timely manner and to develop a clearer approach for targeting SEAM resources. PM&C will continue to work in collaboration with the Northern Territory Government and the Department of Human Services to improve the consistency and application of SEAM.

Summary of The Department of the Prime Minister and Cabinet's formal response

The Department of the Prime Minister and Cabinet considers the audit report from the ANAO to be a balanced report, noting that the audit took place during the early stages of SEAM's rollout.

PM&C accepts the recommendation outlined in the ANAO audit report to improve the consistency and application of SEAM. In April 2014, PM&C held a Bilateral Meeting with the Northern Territory Government to assess SEAM's capacity to address the attendance of all children in a timely manner and to develop a clearer approach for targeting SEAM resources. PM&C will continue to work in collaboration with the Northern Territory Government and the Department of Human Services to improve the consistency and application of SEAM through the development of performance targets, an agreed strategy for targeting SEAM resources and an enhanced performance monitoring framework.

COMMONWEALTH OF AUSTRALIA



Australian Government
Department of Human Services

Kathryn Campbell CSC
Secretary

Ref: EC14/173

Dr Andrew Pope
Group Executive Director
Performance Audit Services Group
Australian National Audit Office
GPO Box 707
CANBERRA ACT 2601

Dear Dr Pope 

Thank you for the opportunity to comment formally on the proposed 'section 19' report arising from the Australian National Audit Office's (ANAO) performance audit of The Improving School Enrolment and Attendance through Welfare Reform Measure (SEAM).

The Department of Human Services (the department) agrees with the ANAO's recommendation.

Attachment A to this letter details our overall response to the proposed report and to the ANAO's recommendation.


Attachment B provides further comments for the attention of the Auditor-General. These are not intended for publication in the final report.

If you would like to discuss the department's response, please do not hesitate to contact Melissa Lond on (02) 6141 8952.

Yours sincerely



Kathryn Campbell

 June 2014

PO Box 3959, Manuka ACT 2603 • Telephone (02) 6223 4411 • Facsimile (02) 6223 4489
Internet www.humanservices.gov.au

Attachment A

Response to the section 19 report on the performance audit of the Improving School Enrolment and Attendance through Welfare Reform Measure.

Recommendation No.1

To improve the consistency of the application of SEAM processes aimed at improving school attendance levels, and to seek to maximise and sustain their impact, in consultation with the Northern Territory Department of Education (NT DoE) and the Department of Human Services (the Department of the Prime Minister and Cabinet (PM&C):

- assess SEAM's current capacity to address all children who meet the criteria of attendance element, in a timely manner; and
- develop a clearer approach to target SEAM resources to achieve its objectives.

DHS response:

Agree. The Department of Human Services will work closely with both the Department of the Prime Minister and Cabinet and the Northern Territory Department of Education to progress the recommendation.

Summary of comments for the follow-up report brochure

The Department of Human Services welcomes this report and considers that implementation of its recommendation will enhance the administration of the Improving School Enrolment and Attendance through Welfare Reform Measure.

The Department of Human Services agrees with the ANAO's recommendation and will work closely with both the Department of the Prime Minister and Cabinet and the Northern Territory Department of Education to progress.



Northern
Territory
Government

DEPARTMENT OF EDUCATION

EXECUTIVE

Level 14, Mitchell Centre
55-59 Mitchell Street, Darwin
Postal address GPO Box 4821
DARWIN NT 0801
Tel (08) 8999 5857
Fax (08) 8999 3537
ken.davies@nt.gov.au

Our ref EDOC2014/25692
FILE2013/286

Dr Andrew Pope
Group Executive Director
Australian National Audit Office
GPO Box 707
CANBERRA ACT 2601

13 June 2014

Dear Dr Pope

Re: Improving School Enrolment and Attendance through Welfare Reform Measure

Thank you for the opportunity to provide comment on the Australian National Audit Office's proposed audit report of *Improving School Enrolment and Attendance through Welfare Reform Measure*.

Please find attached:

1. the Department of Education's response to the recommendation (Attachment A);
2. the department's formal response to the report (Attachment B); and
3. additional commentary of an editorial nature (Attachment C).

I believe you will find our comments to be constructive, purposeful and useful in the development of improved processes for the implementation of SEAM.

If you have any queries about the Department of Education's response, please contact Mr Robert Picton, Director Enrolment and Attendance on telephone (08) 8944 9369 or at robert.picton@nt.gov.au.

Yours sincerely

Ken Davies
Chief Executive

www.education.nt.gov.au

***Improving School Enrolment and Attendance through
Welfare Reform Measure***
**Department of Education response to the recommendation
contained in the Audit Report**

The Australian National Audit Office (ANAO) has made one recommendation directed towards the Department of the Prime Minister and Cabinet strengthening its program implementation.

Recommendation No. 1 Paragraph 3.19

To improve the consistency of the application of Improving School Enrolment and Attendance through Welfare Reform Measure (SEAM) processes aimed at improving school attendance levels, and to seek to maximise and sustain their impact, the ANAO recommends that, in consultation with the Department of Education and the Department of Human Services, the Department of the Prime Minister and Cabinet:

- *assesses SEAM's current capacity to address all children who meet the criteria of the attendance element, in a timely manner*
- *develop a clearer approach to target SEAM resources to achieve its objectives.*

Department of Education response:

The Department of Education is fully supportive of the recommendation and looks forward to further collaboration with Australian Government agencies to improve SEAM's effectiveness through strengthening key aspects of service delivery and performance reporting arrangements.



Improving School Enrolment and Attendance through Welfare Reform Measure

Department of Education formal response to the Recommendation contained in the Audit Report

The Northern Territory acknowledges that the objective of the audit was to assess the effectiveness of the administration of the Improving School Enrolment and Attendance through Welfare Reform Measure (SEAM) by the Department of the Prime Minister and Cabinet (PMC) and the Department of Human Services (DHS) from its commencement in 2013.

The audit's primary finding with regards to strengthening SEAM implementation is based on PMC, DHS and the Department of Education (DoE) working collaboratively to maximise SEAM outcomes. The Australian National Audit Office recognises that reasonable arrangements have been established to support collaboration between Australian Government and Northern Territory Government agencies and suggests there is scope to develop a clearer approach to the targeting of SEAM resources including in relation to the contribution of other school attendance initiatives.

The Department of Education considers SEAM to be an integral part of the suite of measures employed to improve school attendance. DoE is supportive of measures that will align SEAM with other school attendance initiatives including our own Every Child Every Day and the Australian Government's new Remote Schools Attendance Strategy.

The Department of Education supports further collaboration with PMC and DHS in implementing the following actions identified in the report:

- expedite enrolment data collection
- assess SEAM's current capacity and explore opportunities to improve capacity
- develop an agreed approach to targeting SEAM resources
- finalise service level agreements between agencies.

The audit notes that there is some anecdotal evidence that SEAM is having some positive effects and suggests that it is important that PMC develops an appropriate performance management approach in order to establish the impact of SEAM. To this end DoE is committed to working with PMC and DHS to develop an enhanced performance framework including the provision of richer and more detailed performance data where appropriate.

In summary, DoE acknowledges that implementation of SEAM has to date occurred in two of the four scheduled phases and is just one year in to the ten year application of SEAM in the Northern Territory. Much has been learned over the course of the past year and DoE looks forward to further collaboration with Australian Government agencies to improve SEAM's effectiveness through strengthening key aspects of service delivery and performance reporting arrangements.

www.education.nt.gov.au



Australian Government
Department of Education

Secretary
Lisa Paul AO PSM

Dr Andrew Pope
Group Executive Director
Australian National Audit Office
GPO Box 707
CANBERRA ACT 2601

Dear Dr Pope

Thank you for the opportunity to comment on the performance audit by the Australian National Audit Office (ANAO) of the Improving School Enrolment and Attendance through Welfare Reform Measure (SEAM) through the provision of the Section 19 Report extracts.

I note that the extracts provided relate to the administration of the SEAM programme prior to its transfer to the Department of the Prime Minister and Cabinet (PM&C) as part of machinery of government arrangements.

With the agreement of the ANAO, the Department of Education has liaised with PM&C regarding the Section 19 Report and based on these discussions has no further commentary to provide for inclusion in the final report.

Yours sincerely

Lisa Paul

6 June 2014

50 Marcus Clarke Street, Canberra ACT 2601
GPO Box 9880, Canberra ACT 2601 | Phone (02) 6121 6000

Appendix 2: Lessons learnt from the SEAM trial

1. In assessing how effectively the departments learnt from the SEAM trial, the ANAO explored the operation and evolution of the trial, considered the mechanisms used by the departments to learn from the trial and their key findings, and examined whether the relevant departments had taken sufficient action in the design of the new model, where appropriate, to address those findings. As this Appendix demonstrates, while the departments had resolved some issues which arose during the trial, many of the key issues identified in this audit were also identified under the trial. The continuing presence of these issues indicate that the opportunities to learn from a trial and make improvements, were not fully realised.

The operation and evolution of the trial

2. The SEAM trial operated for three and half years from January 2009 to June 2012. In 2009, the trial commenced at six sites (involving 14 schools) across the NT from January 2009. The trial was subsequently expanded to a further six sites (involving 30 schools) in Queensland from October 2009. In total, the trial was allocated funding of \$31.2 million.

3. Different approaches were taken in implementing the trial of SEAM in the NT and Queensland, and these approaches evolved over time. However, enrolment and attendance elements were present in both the NT and Queensland. The enrolment element of the trial was implemented primarily by DHS and initially involved the provision of an enrolment notice to in-scope parents seeking their child's enrolment details. DHS then verified the details with the relevant education authorities. In 2010, a bulk enrolment data collection was introduced to obtain enrolment information directly from education authorities.

4. In contrast with the current SEAM model, the delivery of the attendance element under the trial was shared between DHS and individual schools. The level of participation of schools in the delivery of the SEAM trial evolved over time, and differed between the NT and Queensland. In 2009, NT schools were required to identify children with low attendance, develop individual action plans and monitor the parent's compliance against those plans. If schools subsequently determined that a parent had not complied with the plan, the parent would be referred to DHS who would issue the parent a warning letter. DHS could offer parents Social Worker support, but if the

school ultimately determined that the parent had not taken reasonable steps to comply with their plan, DHS could suspend the parent's payments.

5. In 2010, the role of schools and the level of discretion afforded to them were both reduced somewhat—all children of in-scope parents in the NT were automatically referred to DHS if they recorded five or more unauthorised attendance absences within the previous 10 weeks of school. In contrast, in Queensland students were referred to SEAM at the sole discretion of the school principal, with referrals considered to be used only for students with extreme attendance problems. Individual attendance plans were not used in Queensland, and were discontinued in the NT in 2010.

Lessons learnt from the trial

6. The former DEEWR and DHS sought to review the operation of the SEAM trial through a variety of mechanisms. DEEWR conducted two evaluations of the trial. A final evaluation report of the trial was expected to be completed in early 2014.⁷² In addition to the evaluations, DEEWR also completed a process review in 2011 which examined operational processes and the progression of SEAM since 2009. DHS conducted an internal audit which examined: whether the design of the trial addressed the government's policy intent; whether the systems and processes were implemented as intended; and DHS' project management.

7. Key findings of these reviews are summarised in the table below. ANAO observations, based on its examination of the new SEAM model, on actions taken in response to each finding are also provided.

72 In March 2012, the Community Affairs Legislation committee recommended 'that the SEAM 2012 evaluation be made publicly available as soon as possible following its completion. Timing of the evaluation's release is particularly important given the inappropriate delay in releasing the 2010 evaluation of SEAM.' Senate Community Affairs Legislation committee, The Senate, *Stronger Futures in the Northern Territory Bill 2011 and two related bills* (2012), p. 54. As at April 2014, the evaluation report had not yet been published, however the Department of Employment (which assumed responsibility for the evaluation from the former DEEWR) provided preliminary evaluation findings to PM&C in October 2013.

Key lessons learnt from the trial

Finding/Issue

Key issue/lesson from the trial: The 2010 evaluation found that the issuing of attendance notices and the potential threat of suspension of a parent's welfare payments had the most impact on school attendance.

ANAO observation relating to new model of SEAM: The ANAO notes that bi-annual attendance notices were introduced to remind parents of the presence of SEAM in their community, and its potential impact. Community Information Sessions and the regular presence of SATOs and Social Workers in SEAM communities also promote awareness of SEAM. While these activities raise awareness of the possibility of payment suspension, the ANAO also notes the need for SEAM to be consistently applied to ensure that the threat of suspension is sustained over time (see paragraph 3.16).

Key issue/lesson from the trial: The importance and value of the one-on-one contact (particularly by Social Workers) in assisting parents to manage any barriers relating to their child's schooling.

ANAO observation relating to new model of SEAM: The role of the Social Worker in providing ongoing support to parents is maintained in the new SEAM model. Furthermore, both the SATO and the Social Worker hold a conference with the parent to discuss barriers to attendance and develop a plan for the parent to improve their child's attendance.

Key issue/lesson from the trial: A relapse to poor attendance levels was commonly observed following the completion of compliance periods under the attendance element of the SEAM trial. It was found that contact with Social Workers helped to reduce unauthorised absences during compliance periods, and to a lesser extent, after the compliance period.

ANAO observation relating to new model of SEAM: The role of Social Workers was extended to all parents who are actioned under the attendance compliance process. In 2013, Social Workers were present at all but a very small number of compulsory conferences. However, as previously discussed, the ANAO notes the need for SEAM to be consistently applied to ensure that the threat of suspension is sustained over time.

Key issue/lesson from the trial: The 2010 evaluation identified that the scale of the problem which SEAM aims to address is more significant in the secondary years; as attendance rates were lower overall during those years, and rates were also lower for SEAM students than non-SEAM students in secondary years.

ANAO observation relating to new model of SEAM: Limited activities have occurred to taken to tailor SEAM to address the challenges of secondary school—the new model of SEAM is applied uniformly across primary and secondary years. While it may not be practical for different process to be applied in the case of secondary students, there may be a need for certain circumstances particular to older students to be recognised under SEAM. A commonly cited example included school-age Indigenous teenagers who had undergone adult initiations (and were therefore considered to be able to make up their own minds about attending school), and the challenges that some grandparents experienced in encouraging older teenagers to attend school regularly.

Finding/Issue

Key issue/lesson from the trial: Methods of referral of students under SEAM, and their impact on the numbers of referrals made. For the trial, different approaches were implemented for the referral of students under SEAM. As previously discussed, this ranged from referrals being made at the sole discretion of the school principal, to the automatic referral of all in-scope students who had recorded five or more unauthorised absences over the course of the previous 10 weeks. However there were challenges associated with both approaches. Under the discretionary approach, it was found that only a very small number of parents were being referred. On the other hand, the automatic referral approach resulted in a large number of referrals being made within a short timeframe, which presented a level of 'demand' which was highly challenging to meet.

ANAO observation relating to new model of SEAM: Schools identify students for referral under the new model of SEAM, but the required attendance benchmark was lifted to 10 or more unauthorised absences over the previous 10 weeks.⁷³ However, as is noted by the ANAO from paragraph 3.13, SEAM's ability to meet the level of demand experienced in 2013 is an issue which requires attention. Further, PM&C does not have a mechanism in place to monitor student attendance levels to determine what proportion of children with low attendance levels are being subjected to SEAM processes.

Key issue/lesson from the trial: Relatively high proportions of parents subject to the attendance element of the SEAM trial were granted a 'reasonable excuse' or 'special circumstance' exemption from a suspension of their payments.

ANAO observation relating to new model of SEAM: Specific examples of both reasonable excuses and special circumstances have been prescribed in a legislative determination, and have been used in guidance and training. Furthermore, under the new SEAM model there is greater ability to recognise improvements in attendance and thus stay the progression of payment suspension (which might otherwise necessitate the granting of an exemption). As a result, the ANAO observed that the proportion of parents who have been exempted under the attendance element of SEAM in 2013 has been significantly reduced (refer Note 1, Table 3.2).

73 The required attendance benchmark was determined as part of negotiations for the Schooling Implementation Plan between the Australian and Northern Territory governments.

Index

A

Appeals, 31

B

Barriers to school attendance, 25, 46, 55

Bulk enrolment data collection, 38–40

C

Community information sessions, 48

Compliance notice, 46, 56–58

Compulsory conference, 46, 47, 49, 50, 51, 56–59, 61, 63–65

Conference notice, 47, 53, 58, 59–60

D

Department of Education, Employment and Workplace Relations, 26, 28, 30, 33, 34, 51, 63, 65, 67–68

Department of Families, Housing, Community Services and Indigenous Affairs, 34

Department of Human Services, 26, 28–31, 33, 34, 36, 37, 40–45, 47, 50–51, 53, 54, 56, 58, 60, 61, 63–65, 67

Department of Human Services Social Worker, 25, 28, 34, 46, 47, 49, 51, 53, 55, 61, 67

Department of the Prime Minister and Cabinet, 26, 29, 34, 38, 40, 43, 44, 47, 50, 51, 53, 54, 56, 57, 63–65, 67, 68

E

Enrolment notice, 38–44

Every Child, Every Day, 29, 33, 50, 56

F

Four-weekly attendance reports, 64

G

Guide to Social Security Law, 33

I

Improving School Enrolment and Attendance through Welfare Reform Northern Territory Procedural Guidelines, 33

Income support payment, 25–27, 31–33, 36, 37, 40, 51, 53, 57–58

Income support payment cancellation, 33, 41, 42, 46, 58

N

Northern Territory Department of Education, 26, 28, 29, 33, 34, 36, 37, 40, 43, 44, 47, 49, 51, 54, 56–57, 64–67

Northern Territory Senior Attendance and Truancy Officer (SATO), 33, 34, 46–51, 53–57, 60, 61, 67

P

Payment suspension, 26, 29, 33, 37, 41, 42, 44–47, 51, 56, 58, 64

R

Remote School Attendance Strategy, 29, 52

S

School attendance plan, 33, 46–47, 54, 56

Schools, 48, 53

SEAM communities, 25, 29, 31, 38, 51, 53, 55, 58, 64, 68

SEAM trial, 27, 32, 34, 39, 64, 67, 68

Social Security (Administration) Act 1999, 26, 31, 33, 34, 37, 40, 41, 54

Special circumstances/reasonable excuses, 36, 41, 42, 44, 57, 58

T

The National Partnership for Stronger Futures in the Northern Territory, 27, 28, 31, 51, 65, 66, 68

Series Titles

ANAO Audit Report No.1 2013–14

Design and Implementation of the Liveable Cities Program

Department of Infrastructure and Transport

ANAO Audit Report No.2 2013–14

Administration of the Agreements for the Management, Operation and Funding of the Mersey Community Hospital

Department of Health and Ageing

Department of Health and Human Services, Tasmania

Tasmanian Health Organisation – North West

ANAO Audit Report No.3 2013–14

AIR 8000 Phase 2 — C-27J Spartan Battlefield Airlift Aircraft

Department of Defence

ANAO Audit Report No.4 2013–14

Confidentiality in Government Contracts: Senate Order for Departmental and Agency Contracts (Calendar Year 2012 Compliance)

Across Agencies

ANAO Audit Report No.5 2013–14

Administration of the Taxation of Personal Services Income

Australian Taxation Office

ANAO Audit Report No.6 2013–14

Capability Development Reform

Department of Defence

ANAO Audit Report No.7 2013–14

Agency Management of Arrangements to Meet Australia's International Obligations

Across Agencies

ANAO Audit Report No.8 2013–14

The Australian Government Reconstruction Inspectorate's Conduct of Value for Money Reviews of Flood Reconstruction Projects in Queensland

Department of Infrastructure and Regional Development

ANAO Audit Report No.51 2013–14

The Improving School Enrolment and Attendance through Welfare Reform Measure

ANAO Audit Report No.9 2013–14

Determination and Collection of Financial Industry Levies

Australian Prudential Regulation Authority

Department of the Treasury

ANAO Audit Report No.10 2013–14

Torres Strait Regional Authority — Service Delivery

Torres Strait Regional Authority

ANAO Audit Report No.11 2013–14

Delivery of the Filling the Research Gap under the Carbon Farming Futures Program

Department of Agriculture

ANAO Report No.12 2013–14

2012–13 Major Projects Report

Defence Materiel Organisation

ANAO Audit Report No.13 2013–14

Audits of the Financial Statements of Australian Government Entities for the Period Ended 30 June 2013

Across Agencies

ANAO Audit Report No.14 2013–14

Explosive Ordnance and Weapons Security Incident Reporting

Department of Defence

ANAO Audit Report No.15 2013–14

The Indigenous Land Corporation's Administration of the Land Acquisition Program

Indigenous Land Corporation

ANAO Audit Report No.16 2013–14

Administration of the Smart Grid, Smart City Program

Department of the Environment

Department of Industry

ANAO Audit Report No.17 2013–14

Administration of the Strengthening Basin Communities Program

Department of the Environment

ANAO Audit Report No.18 2013–14

Administration of the Improving Water Information Program
Bureau of Meteorology

ANAO Audit Report No.19 2013–14

Management of Complaints and Other Feedback
Australian Taxation Office

ANAO Audit Report No.20 2013–14

Management of the Central Movement Alert List: Follow-on Audit
Department of Immigration and Border Protection

ANAO Report No.21 2013–14

Pilot Project to Audit Key Performance Indicators

ANAO Audit Report No.22 2013–14

Air Warfare Destroyer Program
Department of Defence
Defence Materiel Organisation

ANAO Audit Report No.23 2013–14

Policing at Australian International Airports
Australian Federal Police

ANAO Audit Report No.24 2013–14

Emergency Defence Assistance to the Civil Community
Department of Defence

ANAO Audit Report No.25 2013–14

Management of the Building Better Regional Cities Program
Department of Social Services
Department of the Environment

ANAO Audit Report No.26 2013–14

Medicare Compliance Audits
Department of Human Services

ANAO Audit Report No.27 2013–14

Integrity of Medicare Customer Data
Department of Human Services

ANAO Audit Report No.51 2013–14

The Improving School Enrolment and Attendance through Welfare Reform Measure

ANAO Audit Report No.28 2013–14

Review of Child Support Objections

Department of Human Services

Department of Social Services

ANAO Audit Report No.29 2013–14

Regulation of Commonwealth Radiation and Nuclear Activities

Australian Radiation Protection and Nuclear Safety Agency

ANAO Audit Report No.30 2013–14

Administering the Code of Good Manufacturing Practice for Prescription Medicines

Department of Health

ANAO Audit Report No.31 2013–14

The Australian Electoral Commission's Storage and Transport of Completed Ballot

Papers at the September 2013 Federal General Election

Australian Electoral Commission

ANAO Audit Report No.32 2013–14

Delivery of the Hearing Community Service Obligation

Department of Health

Department of Human Services

Australian Hearing Services

ANAO Audit Report No.33 2013–14

Indigenous Employment in Australian Government Entities

Across Agencies

ANAO Audit Report No.34 2013–14

Implementation of ANAO Performance Audit Recommendations

Department of Agriculture

Department of Human Services

ANAO Audit Report No.35 2013–14

Managing Compliance of High Wealth Individuals

Australian Taxation Office

ANAO Audit Report No.36 2013–14

The Administration of the Parliamentary Budget Office

Parliamentary Budget Office

ANAO Audit Report No.37 2013–14

Management of Services Delivered by Job Services Australia
Department of Employment

ANAO Audit Report No.38 2013–14

Establishment and Administration of the National Offshore Petroleum Safety and Environmental Management Authority
National Offshore Petroleum Safety and Environmental Management Authority

ANAO Audit Report No.39 2013–14

Compliance Effectiveness Methodology
Australian Taxation Office

ANAO Audit Report No.40 2013–14

Trials of Intensive Service Delivery
Department of Human Services

ANAO Audit Report No.41 2013–14

Commercialisation Australia Program
Department of Industry

ANAO Audit Report No.42 2013–14

Screening of International Mail
Department of Agriculture
Australian Customs and Border Protection Service

ANAO Audit Report No.43 2013–14

Managing Compliance with Environment Protection and Biodiversity Conservation Act 1999 Conditions of Approval
Department of the Environment

ANAO Audit Report No.44 2013–14

Interim Phase of the Audits of the Financial Statements of Major General Government Sector Agencies for the year ending 30 June 2014
Across Agencies

ANAO Audit Report No.45 2013–14

Initiatives to Support the Delivery of Services to Indigenous Australians
Department of Human Services

ANAO Audit Report No.51 2013–14

The Improving School Enrolment and Attendance through Welfare Reform Measure

ANAO Audit Report No.46 2013–14

Administration of Residential Care Payments
Department of Veterans' Affairs

ANAO Audit Report No.47 2013–14

Managing Conflicts of Interest in FMA Agencies
Across Agencies

ANAO Audit Report No.48 2013–14

Administration of the Australian Business Register
Australian Taxation Office
Australian Securities and Investments Commission
Department of Industry

ANAO Audit Report No.49 2013–14

Management of Physical Security
Australian Crime Commission
Geoscience Australia
Royal Australian Mint

ANAO Audit Report No.50 2013–14

Cyber Attacks: Securing Agencies' ICT Systems
Across Agencies

ANAO Audit Report No.51 2013–14

The Improving School Enrolment and Attendance through Welfare Reform Measure
Department of the Prime Minister and Cabinet
Department of Human Services

Better Practice Guides

The following Better Practice Guides are available on the ANAO website:

Administering Regulation	June 2014
Implementing Better Practice Grants Administration	Dec. 2013
Human Resource Management Information Systems: Risks and controls	June 2013
Preparation of Financial Statements by Public Sector Entities	June 2013
Public Sector Internal Audit: An investment in assurance and business improvement	Sept. 2012
Public Sector Environmental Management: Reducing the environmental impacts of public sector operations	Apr. 2012
Developing and Managing Contracts: Getting the right outcome, achieving value for money	Feb. 2012
Public Sector Audit Committees: Independent assurance and advice for chief executives and boards	Aug. 2011
Fraud Control in Australian Government Entities	Mar. 2011
Strategic and Operational Management of Assets by Public Sector Entities: Delivering agreed outcomes through an efficient and optimal asset base	Sept. 2010
Planning and Approving Projects – an Executive Perspective: Setting the foundation for results	June 2010
Innovation in the Public Sector: Enabling better performance, driving new directions	Dec. 2009
SAP ECC 6.0: Security and control	June 2009
Business Continuity Management: Building resilience in public sector entities	June 2009
Developing and Managing Internal Budgets	June 2008
Agency Management of Parliamentary Workflow	May 2008
Fairness and Transparency in Purchasing Decisions: Probity in Australian Government procurement	Aug. 2007
Implementation of Programme and Policy Initiatives: Making implementation matter	Oct. 2006