

Purpose

*This supplementary submission comments on the findings of the 2010 SEAM evaluation that was released on 2 February 2012 – after the due date for primary submissions to the Committee’s current Inquiry into the *Stronger Futures* legislation.*

Background: SEAM and the 2009 evaluation

Under the SEAM program, parents on working-age income support payments in certain regions are required to confirm with Centrelink the enrolment of their children at school and to take steps to improve school attendance where they do not meet attendance benchmarks. Their income support payments may be suspended for up to 13 weeks, and cancelled beyond that period, if they do not comply.

SEAM has operated since 2009 in 6 sites in the Northern Territory (NT) and 6 in Queensland, a total of 44 schools. The program’s target group and procedures have changed substantially since that time in the Northern Territory, and are different again in Queensland.

An evaluation was conducted by DEEWR of the program’s first year (2009) in the NT¹. This was publicly released late in 2011, along with a set of ‘early findings for 2010’.

During 2009, the program in the NT comprised the following elements:

- A requirement for parents whose children were in scope for the program (those of mandatory school age attending certain schools whose parents received income support) to provide Centrelink with their children’s enrolment details, after receiving a standard letter from Centrelink;
- School principals had discretion to refer parents to Centrelink if they considered a child’s attendance to be poor, after which Centrelink notified the parents that they were required to take reasonable steps to improve their child’s attendance within a 28 day period (usually as part of a Individual Attendance Plan developed with the school);
- Centrelink could offer support services such as social work assistance, suspend their income support payments until parents complied with these requirements, and/or find that the parent had a ‘reasonable excuse’ for their child’s non-attendance.

The 2009 evaluation found that:

- There was an increase in enrolments after parents were sent letters from Centrelink advising them of the enrolment notification requirement, but this was offset to a significant degree by lapses in enrolments (‘partial enrolments’) for the same children later in the school year.
- SEAM had no impact on attendance, in large part because school Principals referred very few parents to Centrelink for action to improve attendance. One

¹ DEEWR (2010) *SEAM evaluation report for 2009*.

reason for this was that Principals were wary of harming relationships between parents and the school.

Significantly, statistical analysis in Appendix “C” of the Report noted that:

- 90% of parents within scope for SEAM in the NT were of Aboriginal or Torres Strait Islander background;
- The implementation of the program was affected by considerable mobility among the families within scope for SEAM, so that of 1,658 children within scope during 2009, 483 were no longer within scope by the end of that year;
- In about one third of these 483 cases, the parent no longer lived in a SEAM trial site and in another third the parent no longer received income support.

These statistics raise important questions about the appropriateness of the targeting of the scheme: whether it was indirectly discriminatory against Indigenous people in the NT and whether it is efficient to target income support recipients (rather than *all* parents of children required to attend schools) for a program to improve school attendance. They also underline the challenge of maintaining school enrolment and attendance among students who are highly mobile.

In addition, the broader NTER Evaluation Report, which examined school attendance statistics for the Northern Territory over the period before and after the introduction of SEAM found that:

‘There has been no observable improvement in school attendance [in the NT] between 2006, before the NTER, and 2010.’²

The 2010 SEAM evaluation

The 2010 evaluation of the program by DEEWR dealt with the performance of the program during that year on both the NT and Queensland. It was released publicly on 2 February 2012³.

By that stage, the attendance component of the program had changed significantly *in the NT*:

- Parents within scope for SEAM were automatically referred to Centrelink where their child failed to reach a standard attendance benchmark of at least 5 unauthorised absences within a ten week period;
- Centrelink could either exempt the parents from the requirement, offer support services such as social work assistance, suspend their income support payments until parents complied with these requirements, and/or find that the parent had a ‘reasonable excuse’ for their child’s non attendance.

These changes substantially increased the number of parents required by Centrelink to take steps to improve their children’s attendance.

² Australian Government (2011), *NTER Evaluation Report*.

³ DEEWR (2012), *SEAM evaluation report for 2010*.

We understand that the new compliance arrangements and penalties in the NT Government's 'Every Child Every Day' strategy were not yet in place during 2010, so this evaluation would not have captured their impact, though other NT Government initiatives to improve school resourcing and community engagement with public schools may have commenced by that time.

In *Queensland*, unlike the NT by this stage, school authorities still had discretion whether to notify Centrelink of unsatisfactory school attendance among students within scope for SEAM. Thus, the attendance component of SEAM in Queensland operated along broadly similar lines to that in the NT in 2009. The SEAM 2010 Evaluation Report indicates that principals only referred parents to Centrelink after their own efforts to improve attendance were unsuccessful.

Importantly, awareness of SEAM among parents within its scope in Queensland was low, with only 40% reporting that they had heard about the program. This suggests that we should be wary of drawing firm conclusions about the program's impact in that State.

Combining the results for the *NT and Queensland*, the 2010 SEAM evaluation found that, in relation to *enrolment*:

- Two thirds of the 144 children in scope for SEAM who were not enrolled when their parents were sent an enrolment letter by Centrelink were enrolled a month later, though the evaluation was unable to determine the extent to which this was triggered by SEAM – one reason for this being lack of enrolment data from non-government schools (p25);
- On the other hand, the proportion of children who dropped out part way through the year in the NT increased from 31% in 2009 to 37% in 2010 so (consistent with the 2009 evaluation) improvements in enrolment rates were often not sustained (p23);
- 111 parents were sanctioned in 2010 for not providing enrolment information to Centrelink, however only 2 of them were not enrolled at the time (since the sanctions were imposed for not providing enrolment information to Centrelink, not for the failure to enrol a child, p26)

This last finding underscores the risk that compliance systems such as SEAM may divert resources and attention away from their original goals (in this case, school enrolment) and needlessly penalise people. In this case, it appears that many parents were penalised for breaching an administrative requirement of the SEAM program even though they met their obligation to enroll their child at school.

Many features of the SEAM compliance system closely resemble the compliance system for the activity test for unemployed people on income support. While it is important to ensure that unemployed people comply with those requirements, that system, with its complex array of penalties for failure to attend interviews with Centrelink or employment service providers, has diverted the attention and resources of service providers and jobseekers away from practical employment assistance towards mechanical

enforcement of attendance at meetings and the calibration of penalties for 'participation failures'.

The evaluation's findings on *attendance* include that:

- There was a 5% increase in attendance rates in SEAM schools in the NT from 2009 to 2010, compared to a 2% increase in non SEAM schools⁴;
- There was a 2% increase in SEAM schools in QLD, compared to no change in non SEAM schools (but note the low awareness of the program in Queensland);
- Improvements in attendance were often not sustained beyond a month or two;
- There was a high rate of exemptions from requirements for parents to improve their child's attendance (one third of those receiving attendance notices in the NT), suggesting that many barriers to attendance beyond the parent's control were identified;
- The number of non attendance sanctions was small (8 in all), and the report concluded that sanctions had no impact on reducing unauthorised absences (p52);
- On the other hand, in the NT, the support provided by social workers appeared to have a significant impact on school attendance (p47).

Limitations of the 2010 evaluation:

Contrary to the assertion in FaHCSIA's submission to the present Inquiry that:

*'The 2010 evaluation of SEAM showed that SEAM is having a positive effect on both enrolment and attendance'*⁵, the evaluation is cautious in drawing conclusions about the program's impact, especially on attendance. The Report states, in respect of school attendance in SEAM schools in the NT, that:

'Further comparative analysis planned for the final evaluation is necessary to be more definitive about the impact of SEAM'. (p36).

The evaluation Report makes it clear from the outset (p9) that its results are only indicative, rather than conclusive, about the effectiveness of SEAM because of the following limitations of the evaluation method and the available data:

- There was no comparison or control group, so we don't know to what extent improvements in outcomes measured (enrolments and improved attendance) would have occurred without SEAM;
- There was limited data available from non-Government schools, so, for example, we do not know whether parents who apparently 'failed' to enrol their child at a given school had in fact moved them to another;
- The families studied were very mobile, especially in the NT.

⁴ The Report refers to an 11% improvement in attendance (a reduction in unauthorised absences) after parents were referred to Centrelink to help resolve attendance problems. However, it is not clear to what extent this improvement was triggered by SEAM (or would have occurred anyway). The Report's comparison between changes in attendance rates for 'SEAM' and 'non-SEAM' children in SEAM schools is a more valid measure of the program's impact, though for reasons we outline later, even these data do not accurately capture the program's impact.

⁵ FaHCSIA 2012, Submission, p21.

Conclusions

For the reasons outlined above, it is not possible to draw definite conclusions about the impact of SEAM on enrolment and attendance from the 2010 evaluation. The following assessment, based on data presented in the evaluation Report, is therefore preliminary. *The 2010 evaluation cannot be relied upon to justify expansion of the program on the grounds the program has proved effective in the schools where it operated in the NT and Queensland during 2009 and 2010.*

Data presented in the 2010 SEAM evaluation suggests, but does not 'prove' by the standards usually applied to evaluation research, that SEAM had small positive impacts on school enrolment and attendance that were not, however, sustained in a substantial proportion of cases.

As with other compliance-based approaches to social problems, the impact of SEAM is likely to be superficial and temporary. This raises questions about its cost effectiveness, since any small gains from improved compliance must be offset against the costs. Those costs include the administrative cost of the program, the loss of income experienced by economically vulnerable families and their children, and (as the Committee has heard from many Aboriginal witnesses in the NT) the pervasive *fear* among parents that if their child does not attend school they will lose their income support. This could undermine efforts to increase community engagement with schools.

The Report also suggests that case management with social workers made a bigger difference to school attendance than sanctions. It is not clear from the evaluation whether such assistance is best provided by Centrelink or by other agencies (such as schools, or Aboriginal health services as one submission suggests). While this is not a criticism of Centrelink social workers (who seem to have risen to a difficult challenge), in our view SEAM extends the role of Centrelink social workers both 'above' and 'below' their field of expertise - by requiring them to act as education and child and family welfare specialists in complex cases, and home school liaison officers in others. This raises the important question (not addressed by the evaluation) whether Centrelink has the capacity to venture into specialised fields of social policy that are traditionally the preserve of State and Territory Government agencies. The assessment of applications for exemptions from Income Management on the grounds of 'good parenting' by Centrelink officers in the NT (not social workers) using a 'good parenting' checklist is another example of this problem.

On the other hand, the Report indicates that most of the sanctions applied in regard to enrolment were unwarranted and that sanctions for attendance were ineffective (though the samples in that case were small).

These findings support those of evaluations of similar programs overseas, that it is case management rather than sanctions that make the most difference to school attendance⁶.

The evaluation can only be regarded as inconclusive – but in our assessment it raises the following questions about the cost-effectiveness of SEAM:

- Whether the costs (fear, loss of family income, and administrative costs) are justified by the outcomes achieved;
- Whether outcomes achieved from compliance measures such as SEAM are deep and sustained, or superficial and temporary;
- Whether it would be more cost effective, as well as fairer, to apply the same compliance system for non-enrolment and attendance to all families, rather than singling out those on income support (and indirectly, Aboriginal and Torres Strait Islander families) for 'special treatment';
- Whether more investment in case management and community-school engagement within the ambit of holistic strategies such as Every Child, Every Day', would yield better results.

⁶ Campbell & Wright (2005), *Rethinking welfare school attendance policies*, Social Service Review, V79 No1, March 2005.