Summary

The Bill, if passed, would:

- Extend compulsory income management to recipients of social security pensions or allowances who are referred by State and Territory regulatory authorities including the Northern Territory Alcohol and Other Drug Authority;
- Facilitate the extension of compulsory and voluntary income management to recipients of social security payments in five new regions outside the Northern Territory on referral from child protection authorities, or Centrelink social workers on the grounds of 'vulnerability'.
- Extend the suspension for parents of certain income support payments whose children are not enrolled or regularly attending school under the SEAM measure to additional communities in the Northern Territory and integrate the administration of this measure with the Northern Territory Government's 'Every Child Every Day' initiative.

We recommend that these measures be *opposed*, for the reasons outlined below.

The single most positive outcome from the Northern Territory 'intervention' is that national attention has focused on the complex and intractable social problems associated with high levels of intergenerational unemployment that are concentrated within communities – Indigenous or otherwise. Subsequently, the Government's social inclusion agenda and place-based social policy initiatives brought more rigour to the policy response to these problems.

In remote Indigenous communities in the Northern Territory, this means that for the first time in many years the Federal and Territory Governments have invested substantially in new educational facilities and extra teachers, new housing, and child protection, counselling and support services.

However the impact of these welcome investments has been blunted by the 'top-down' way in which the NTER was implemented, the undermining of local Governance structures, and the negative stereotypes about Indigenous people 'on welfare' that were strongly reinforced by measures such as the blanket imposition of Income Management, the signs at the entrance to communities, and media stories implying that Indigenous parents generally fail to care for their children properly. The message which these policies sent to the communities was that they had failed to resolve their problems and that Government must therefore step in and take control, including control of people's incomes.

While it is necessary to name problems so that they can be solved, these policies will fail unless Governments stop reinforcing negative stereotypes and work with individual communities to implement local solutions to problems owned by the communities. The imposition of compulsory income management upon broad categories of people contradicts the Government's stated aim – to make it available to communities as 'a tool' to help deal with entrenched social and financial problems.

When the blanket system of compulsory income management was extended beyond Indigenous communities in the Territory, the negative stereotyping of 'people on welfare' was reinforced for other groups – especially sole parents and unemployed people on income support – despite a lack of evidence that the groups targeted were unable to manage their financial affairs.

A further problem with both income management and SEAM is that there is no consistent hard evidence that they work, at least in the way they have been implemented so far. Yet public investment, policy energy and resources on the ground have been disproportionately devoted to them. They have been used as a first rather than a last resort, displacing other strategies including intensive case management and strengthening the relationship between schools and local communities.

We have nine specific concerns about the current Bill which are listed below, and elaborate on four issues in more detail in the body of the submission.

First, the Government has not consulted properly with the communities most affected by these measures: Indigenous communities in the Northern Territory and the communities of Bankstown, Shepparton, Rockhampton, Logan and Playford. Before compulsory income management and SEAM were first introduced as part of the NTER, and when the announcement was made in the Federal Budget that income management would extend to the five targeted communities, the communities were not asked whether they wanted these programs.

Income management was not included in the Government's agenda for this year's 'Stronger Futures' consultations in the Northern Territory. Participants at the Stronger Futures Consultations were asked about what would support school attendance and a range of views were expressed, but these responses do not constitute a mandate for an extension of SEAM. The Governments have not yet responded to other proposals raised by communities to improve school attendance, including incentive based measures and improvements to the educational environment.

Second, by opening up the prospect of almost unlimited extension of income management to new regions and social purposes, the Bill stands the normal process for developing social programs on its head. In place of the conventional policy approach where problems and target groups are clearly defined and policies are developed in response and then evaluated and adjusted, the Government is extending income management as a generic response to the complex problems afflicting poor communities, in the absence of hard evidence that it is cost effective.

If the Bill is passed, the Minister could potentially approve compulsory income management referrals by State or Territory Government authorities to deal with problems ranging well beyond child neglect or alcohol abuse, for example public housing rent arrears or unpaid traffic fines. The Bill would also facilitate the extension of income management to new regions nominated by the Minister, not only the five Local Government Areas announced in this year's Budget.

Third, the Bill proposes to delegate social security powers (the imposition of income management) to unspecified State and Territory authorities without providing a

legislative framework for fair decision-making. In one sense, greater reliance on specialised State and Territory Government agencies to assess individual circumstances is a positive development. Centrelink lacks specialist skills in areas such as child protection and alcohol and drug addiction. However, these State and Territory bodies lack expertise in social security law. In other cases where specialist expertise is used in income support assessments – such as Job Capacity Assessors in respect of DSP assessments and Job Services Australia providers in respect of benefit compliance - Centrelink maintains the discretion to accept or reject specialist advice.

The Bill makes no reference to guidelines under which these authorities will exercise their delegations (including the basis for decisions to refer individuals for income management, its duration, and when it stops) and does not provide for a review or appeals process to ensure that decisions are fair and natural justice is assured. This is already a problem with 'child protection' income management in the Northern Territory.

Fourth, both income management and SEAM have high opportunity costs. That is, the funds being invested in these programs could be more efficiently invested in initiatives to improve income support, employment assistance, housing, health, education and family services in poor communities.

The average cost per person assisted by income management in the Northern Territory is over $4,000 and the average cost per person assisted in the five 'new' regions is over $6,000. This includes the initial cost of setting up the program in a new region (such as registration of retailers) and the ongoing Centrelink resources required to interview and assess those assisted, and negotiate and manage budgets.

These average unit costs are approximately one third and one half respectively of the maximum single rate of Newstart Allowance. Thus, the program increases the cost to Government of social security payments for those assisted by one third to one half. Any program as expensive as this should be subject to rigorous cost benefit analysis. To date, there is no hard evidence that the program is achieving its goals and the objectives themselves are highly ambiguous.

The average cost of SEAM is $200,000 per school, which could be spent on intensive case management for families whose children do not regularly attend school.

Fifth, given the lack of clarity over the purpose of income management and its cost of implementation (especially in the early stages of introduction to a region), there is a high risk of 'function creep'. Having made such costly investments in the program, Ministers and officials will come under pressure to demonstrate its value by extending it to new groups and social problems. This is illustrated by recent discussions between FAHCSIA officials and state housing authorities over the referral of social tenants who are having difficulty paying their rent to Centrelink social workers to assess whether they should be compulsorily income managed as 'vulnerable' recipients, when existing Centrepay arrangements would fulfill the same policy goal (preventing homelessness) at a fraction of the cost.

Sixth, although in theory the Parliament could block such extensions of the scope of income management by disallowing the relevant Legislative Instrument, the Bill weakens

the authority of the Parliament to set the levels and conditions of social security payments by shifting key provisions from primary legislation to disallowable instruments. We submit that this should be of concern to Senators regardless of the content of the legislation.

Seventh, the extension of the scope of income management and the SEAM trials facilitated by the Bill would come despite a lack of hard evidence on whether these measures target the right people (the assumption that recipients of these particular payments are unable to properly manage their finances and care for their children) and whether it is improving social outcomes (such as financial management, community safety and children's well being and school attendance). We understand that one of the reasons the Government declined to include income management in its agenda for discussion in the Stronger Futures consultations was that the evaluation of income management in the Northern Territory was incomplete, yet the current Bill leapfrogs the release of the preliminary findings of that evaluation by extending the scope of income management in both the Territory and elsewhere.

The official evaluation of the SEAM trials is also incomplete and no reports have been publicly released from that evaluation. We note that a '2009 evaluation report' has been completed by DEEWR and ask that it be publicly released to inform this inquiry. Despite the trials, school attendance has been falling since 2009 in Indigenous communities in the Northern Territory. The evaluation report into the NTER concluded that:
'There has been no observable improvement in school attendance between 2006, before the NTER was introduced, and 2010, the last year for which data are available.'

The only previous official evaluation of a similar initiative – the Halls Creek trial, found that the linking of income support payments to school attendance did not improve attendance. It found that parents often had little control over whether their children attended school and that a major barrier to attendance was the local school's lack of engagement with the community, the importance of which has been emphasised repeatedly by Indigenous communities and educators.

While we acknowledge the increased investment in schools in Indigenous communities in the Northern Territory, the SEAM program in the Northern Territory started at the punitive and simplistic end of the range of potential solutions to a set of complex problems. It started with the imposition of a penalty, and then, in its various iterations, worked backwards to identify the causes of individual non-attendance through the use of social workers, and as proposed now (in conjunction with the *Every Child Every Day* initiative), via case conferencing and attendance plans. While these measures will help identify the underlying causes of non-attendance, they are unlikely to resolve them. That requires a combination of intensive case management and action to deal directly with the underlying problems including changes in school environments and their relationship to communities. The SEAM program is not evidence based policy - rather it has diverted attention and resources from programs that work.

Eighth, the Northern Territory Government's '*Every child, Every day'* initiative already imposes hefty fines (for example starting at $1,995 and as high as $2,600) on parents whose children consistently do not attend school. This arguably renders the SEAM program redundant. It is not clear how the suspension of income support interacts with

these penalties, but the imposition of fines on top of payment suspensions would also be exceedingly harsh.

Ninth, and perhaps most importantly, the legislation discriminates directly against people on low incomes who are the recipients of income support payments, and indirectly against Indigenous Australians, since the majority of those affected by compulsory income management and SEAM are Indigenous people.

1. Consultation and partnership with communities

In considering these measures, an important threshold issue for ACOSS is the extent to which those most affected – the local communities targeted – and representative bodies with a long standing interest in Indigenous and social security policy were consulted in their development.

The importance of getting consultation right is underscored by the Government's evaluation of the NTER, released this month, which concluded that:
'blanket imposition of Income Management —in combination with other changes, such as local government reform, shire amalgamation and loss of local councils; changes to the Community Development Employment Projects (CDEP) program; the loss of the permit system; and changes in land tenure, contributed to people's feeling of a loss of freedom, empowerment and community control.'

In regard to the measures contained in the Bill, the Government's recent 'Stronger Future' consultations were flawed.

The consultations did not explicitly include income management, partly on the grounds that the evaluation was incomplete and partly on the grounds that that it is now a national policy. This ignores the fact that most people affected by income management are Territorians (and most of those affected in the Territory are Indigenous people), and that the blanket system of Income Management that applies to long term recipients of income support payments only applies (so far) in the Northern Territory.

Submissions were not sought from representative organisations in the Northern territory or nationally, and to our knowledge there was been no national consultation on the proposed extension of Income Management to new regions – including with the communities themselves - before this was announced in the Budget.

We note that Aboriginal Peak Organisations Northern Territory (APONT), a coalition of key representative body of Indigenous organisations in the Territory, recommended in its 'Stronger Futures' submission that compulsory income management based on the duration of receipt of income support be repealed and replaced by a voluntary system based on behavioral triggers, to be negotiated with each community.

We understand that Northern Territory Indigenous communities who participated in the Stronger Futures consultations advanced a number of concrete measures to improve school attendance, including introducing Aboriginal culture into the curriculum, involving elders and parents more in school activities, developing mentoring programs for parents, and doing more to attract and retain good teachers. By extending the SEAM measure, the Government has so far responded to community concerns and proposals around school attendance in a one sided and punitive way.

On these grounds alone, these measures should not be passed.

On 23 November, ACOSS released a media statement (attached) in conjunction with 24 organisations and representative bodies. The groups argued that instead of extending

the punitive approach the Government should take a new road. It should withdraw the current legislation and engage with communities and their organisations and peak bodies on whether they want to replace policies such as SEAM and income management that were imposed on them compulsorily, with voluntary or 'opt in' income support arrangements and support services tailored to the needs of each community.

2. Compulsory income management referrals from State and Territory authorities

The Bill proposes to extend compulsory income management to recipients of all pension and allowance payments who are referred by State and Territory regulatory authorities including the Northern Territory Alcohol and Other Drug Tribunal.

The power that would be vested in State authorities to compulsorily refer individuals to Centrelink for income management is substantial, and of concern. It does not appear that Centrelink would have discretion to refuse a referral after undertaking its own assessment of individual circumstances. Further, payment recipients who disagree with a decision would not appear to have access to the normal social security review and appeals system. This greatly increases the risk of unfair and inconsistent decision making and denial of natural justice.

This is the case with the operation of Child Protection Income Management (CPIM) in the NT, where Centrelink is afforded no discretion in relation to the implementation of the notification received from the Department of Children and Families (DCF). This means that Centrelink has no oversight over the decision making process at DCF, and therefore is unable to determine whether the decision has been made properly under DCF policies or in accordance with the objectives of CPIM. Even if Centrelink were allowed to view the DCF decision making process, the legislation does not give Centrelink any discretion in the implementation of the notice.

This has implications for a person's ability to review the decision because, as there is no discretion for Centrelink, there is no point in seeking review under Centrelink administrative procedures. Instead, the person must seek internal review through DCF. In the Territory, this is a particular problem as there is have no external administrative review body that is able to review decisions of Government departments or personnel. Once the internal appeal mechanisms are exhausted, the choices are the Ombudsman (who does not have decision making powers) or judicial review (with its associated costs and risks).

This also raises concerns about the expertise of external organisations in social security administration and the implications for social security law of future amendments to the relevant State or Territory legislation (which could dramatically alter the scope of referrals without any legislative input from the Parliament of Australia). For these reasons, the automatic referral of social security powers to bodies outside the Australian Government is unusual and should be used very sparingly. For example, although Job Capacity Assessment panels are used to advise Centrelink on a Disability Support

Pension applicant's work capacity, the decision on pension eligibility is still made by a Centrelink officer in their capacity as delegate of the Secretary.

It is therefore of concern that this power is extended to other State and Territory bodies in such an open ended way in the Bill. Rather than simply name the organisation to which the Government intends to extend this power at the present time - the Northern Territory Government Alcohol and Other Drugs Tribunal - the Bill allows the Minister to extend this power to other State and Territory bodies named by Legislative Instrument. This delegation is not limited to a single social policy objective (such as control of alcohol abuse), by geography (to particular locations) or the nature or purpose of the State authority.

The only constraint on the scope of such delegation of powers appears to be the requirement that the Minister name the authority in a Legislative Instrument. The increasing reliance on Legislative Instruments in social security policy in recent years has reduced the transparency of the legislative process and the ability of the Parliament to steer the course of important policy changes in this area.

The Bill opens up the possibility that in future, Ministers could approve the use income management by State authorities as a means to enforce compliance with a wide range of requirements from the payment of public housing rents to the collection of traffic fines. This would be discriminatory as it would only apply to recipients of social security payments.

This proposed delegation to State authorities also highlights the risks of 'function creep' in the administration of income management. Having invested substantial funds to establish income management systems in a region (including the registration of local retailers), Governments will find it hard to resist the temptation to extend its use well beyond the original purpose, especially given that this is so poorly defined in the first place. The 'purpose' of income management has already extended from child protection to a reduction in spending on alcohol and gambling, improved nutrition, and reducing 'welfare dependency'. If the Bill is passed, 'function creep' could also extend from Australian Government to State Government policy objectives (well beyond child protection).

Where a State or Territory authority is relied upon as a source of expert assessment for social security purposes, or the Australian and State Governments are partnering to address a social problem that touches on the social security system, the policy objectives should be clearly expressed, the State Authority should be specifically named in the primary legislation, and its powers in relation to social security payments should be strictly outlined and circumscribed, Centrelink should maintain its discretion to make the final decision, and the standard social security review and appeals process should apply.

In any event, income management should only apply with the agreement of each individual or community concerned. The proposed delegation of power to State or Territory authorities to refer people compulsorily for income management would apply nationwide.

3. Extension of income management to new regions

ACOSS does not support the extension of income management to any region unless there is a consensus in the community that it is needed to resolve social problems of concern to that community, and the system is tailored to community requirements through an inclusive consultation process.

Our general views on income management were outlined in our previous submission to the Committee in response to the Bill in 2009 and there is no need to elaborate on them here.

It is clear that the Government did not undertake thorough-going consultations with any of the five communities who are now being targeted for the further extension of 'child protection', 'vulnerable' and 'voluntary' income management, before announcing its decision in this year's Budget. We are not aware of calls from community organisations within those communities for the introduction of income management prior to the Budget announcement. As with the Northern Territory Intervention, income management is being imposed on these communities by Government.

For this reason, we recommend that those parts of the Bill that facilitate its imposition in these (and potentially many other) regions be opposed.

We also have specific concerns about the proposed extension of the 'vulnerable income management' measure, according to which individuals on pensions or allowance payments can be compulsorily referred to income management where they are assessed as 'vulnerable'. The Legislative Instrument which sets out the scope of this measure states that:

'For the purposes of this instrument, an indicator of vulnerability is one of the following:

- *Financial hardship. For the purposes of this instrument, a person is defined as experiencing financial hardship where they are unable to access or engage in activities that meet their priority needs and the priority needs of their children, partner and other dependents, due to a lack of financial resources. The receipt of income support payments in itself does not define a person as experiencing financial hardship, rather a lack of skills or ability to manage limited resources may result in financial hardship. For the purposes of income management, priority needs are those defined in Section 123TH of the Social Security Administration Act 1999 (Cth).*
- *Financial exploitation. Where a person is subject to undue pressure, harassment, violence, abuse, deception or exploitation for resources by another person and/or people, including other family members and community members.*
- *Failure to undertake reasonable self care. This may be due to factors including, but not limited to substance abuse, problem gambling, and/or mental health issues.*

- *People who are homeless or at risk of homelessness.'*

The scope of this 'vulnerable' classification is potentially very broad. There is a risk that the Centrelink social workers who undertake the assessment will be bound by administrative guidelines to include a growing number of social security recipients within its scope. Possible examples include:

- Public housing tenants who are behind in their rent (as a result of agreements entered into with State Housing authorities as discussed above);
- Individuals who request urgent payments or loans from Centrelink;
- Individuals with drug or alcohol addictions generally;
- Victims of domestic violence (who are often financially exploited by the perpetrator).

As we have noted previously, there is a risk that people will be more reluctant to disclose such problems to Centrelink social workers, as they become aware of the risk that they may be income managed.

4. Extension of the SEAM trials in the Northern Territory

ACOSS has raised concerns about the SEAM program in a previous comprehensive submission to this Committee regarding the Social Security and Veterans' Entitlements Legislation Amendment (Schooling Requirements) Bill 2008, so there is no need to revisit all of the arguments here.

However, one of our key points still stands: there is no evidence to suggest that punitive measures such as the suspension of income support will significantly improve school attendance or learning outcomes for children.

In our previous submission we cited a 2005 study of seven US welfare school-attendance programs that made use of financial sanctions. This found that 'sanction-only' programs had a negligible effect on school attendance.[1] Those which combined sanctions with individual case management also saw no positive increase in the attendance rates. Only programs which combined sanctions, case management, support services and financial incentives for attendance or graduation saw limited but positive results, with case management seen as a the critical variable. Even in these cases, the reported gains were in enrolment rates, rather than longer term improved attendance patterns or other indexes of wellbeing. The critical finding of this study was that 'case management services are critical to the ability of welfare school-attendance programs to achieve their objectives' with most evaluations crediting improvements in attendance to 'the ability of case managers to convey information about support services and potential bonuses or to provide those services directly'.

[1] David Campbell and Joan Wright, 'Rethinking Welfare School Attendance Policies', Social Service Review, Vol. 79(1), March 2005.

That study also found that sanctions-based models spent disproportionate resources monitoring attendance rather than addressing the underlying causes of non-attendance, including social exclusion factors.

The official evaluation of the SEAM trials is incomplete and preliminary reports to Government have not been publicly released. Despite the trials, school attendance has fallen since 2009 in Indigenous communities in the Northern Territory. The evaluation report into the NTER concluded that:
'There has been no observable improvement in school attendance between 2006, before the NTER was introduced, and 2010, the last year for which data are available.'

The only previous official evaluation of a similar initiative in Australia – the Halls Creek trial - found that the linking of income support payments to school attendance did not lead to a sustained improvement in school attendance. On the contrary, the evaluation found that parents often had limited influence over their children's attendance which was affected by factors such as bullying, and that a major barrier to attendance was the school's lack of engagement with Indigenous communities. The importance of close engagement with communities and cultural relevance has been emphasised repeatedly by Indigenous communities and educators.

Factors associated with non-attendance at school among Indigenous children include:

- Frustration and low self-esteem due to poor performance;
- Lack of identification with educational values and expectations;
- School failure to respect and validate cultural and self-identity and supply experiences that are relevant to life's circumstances.
- The level of education of a child's carers;
- The risk of clinically significant emotional or behavioural difficulties;
- The occurrence of a high number of stressful events;
- Language barriers;
- Inadequate sleep;
- A history of attending day-care (with those who had never attended day-care more likely to have low attendance rates).[2]

We understand that Northern Territory Indigenous communities who participated in the Stronger Futures consultations advanced a number of concrete measures to improve school attendance, including introducing Aboriginal culture into the curriculum, involving elders and parents more in school activities, developing mentoring programs for parents, and doing more to attract and retain high quality teachers.

The relevance of such measures is reinforced by existing evidence which suggests that successful measures to improve attendance may be better achieved by the introduction of:

- Breakfast and lunch programs;
- Programs that bring the Aboriginal community, especially Elders, into the schools;

[2] The Western Australian Aboriginal Child Health Survey: 'Improving the Educational Experiences of Aboriginal Children and Young People', Curtin University of Technology and Telethon Institute for Child Health Research, 2006, p 115.

- Aboriginal teacher's aides and Aboriginal teachers;
- Curriculum that engages Aboriginal children; and
- Programs that blend the development self-esteem and confidence through engaging with culture with programs that focus on academic excellence[3].

These factors are present in a range of successful community-school driven projects including Augusta Primary School in South Australia, Cairns West State School in Queensland, Darlington Public School in New South Wales, the Deadly Ways to Learn project in Western Australia, the Ganai project in Victoria, the Merredin Senior High School in Western Australia, Narrabundah Primary School in the ACT, Nidia Noongar Boodjar Noonook Nyininy materials, the Kimberley (WA), the Rosetta Primary School in Tasmania and Yarrabah State School in Queensland.

Many positive measures have been implemented by schools over the years to engage families and improve educational outcomes, often in the face of limited resources. However, as with early childhood and youth services, and the provision of housing, there is still much work to be done and significant funding required to appropriately resource all schools in the Northern Territory. The funding which will be spent on the new SEAM measure, (averaging $200,000 per year per school) could instead be spent on the above measures and others which will improve educational outcomes– such as attracting and retaining teachers; increasing teaching numbers; increase bilingual educational opportunities; and hearing-modified classrooms (given that more than 50% of Aboriginal children have hearing problems),

Governments should also facilitate access to quality early education and care and parenting centres and home visiting programs, which are critical to overcome barriers to subsequent school attendance. It is vital that there are measures in place which work with families when their children are in the 0-3 age group, given that it is now clear that important and rapid cognitive and emotional growth happens very early in life. If we wait until age 3 or 4 to enrol the most vulnerable children in education, they will enter far behind.[4]

We note the following recommendation made by the Central Australian Aboriginal Congress (2011):
"That high quality child care centres be established for all children aged 1 to 3 from disadvantaged households in Alice Springs and surrounding communities. That these centres implement the Carolina Abecedarian early intervention approach to build school readiness and maximise potential for positive educational and social outcomes in young adulthood. That these children transition into 2 years of pre-school." [5]

We support the provision of qualified, culturally trained social workers in communities to assist parents and caregivers to understand and act on their responsibilities to ensure their children attend school regularly and access other positive school initiatives. This is an improvement on the original SEAM regime where school principals effectively had to

[3] Larissa Behrendt http://morethanluck.cpd.org.au/more-than-luck-ebook/rethinking-closing-the-gap/.
[4] Central Australian Aboriginal Congress, Rebuilding Family Life in Alice Springs and Central Australia: the social and Community dimensions of change for our people, 2011
[5] Central Australian Aboriginal Congress, Rebuilding Family Life in Alice Springs and Central Australia: the social and Community dimensions of change for our people, 2011

act as case managers of high needs families. It would be desirable to locate social workers within organisations, including Aboriginal organisations, who already provide a family support service.

Suspensions are likely to impose hardship on families already living at poverty levels. The cancellation of a payment where someone has income management deductions in place, such as rent or utilities payments, would compound this hardship and could lead to homelessness. We note that the Northern Territory Government's 'Every child, Every day' initiative already imposes hefty fines (for example starting at $1995 and as high as $2,600) on parents whose children consistently do not attend school. It is not clear how the suspension of income support interacts with these penalties, but the imposition of fines on top of payment suspensions would be exceedingly harsh.

It is not clear if discretion will be available to Centrelink in circumstances where all children bar one in a family are attending school regularly. It would be harsh to suspend a caregiver's payments under such circumstances

It is also not clear what consideration will be given to individual family circumstances, such as mobility and or/homelessness and language and literacy issues.

We submit that rather than extend the SEAM trials in conjunction with penalties imposed as part of the Northern Territory Government's '*Every child, Every day'* strategy, both Governments should enter into dialogue with Indigenous communities to implement measures to improve school participation that are based on local community consultation, engagement, and solid evidence.