2

ABSTUDY

Introduction

2.1 The ABSTUDY Policy Manual, produced by the Australian Government Department of Social Services, states that:

ABSTUDY ... signals the Australian Government's recognition that education will be a key to the Government's objective of reconciliation with the Indigenous community, and a prime measure by which its overall performance in this area will be measured.

The main objectives of the ABSTUDY Scheme are to:

- encourage Aboriginal and Torres Strait Islander people to take full advantage of the educational opportunities available;
- promote equity of educational opportunity; and
- improve educational outcomes.¹
- 2.2 The scheme aims to address educational disadvantage by assisting with the costs associated with study, housing, living expenses and travelling to or from a place of study, if study must be away from home.
- 2.3 ABSTUDY is made up of a range of payment types which are supposed to respond to the particular needs of students and their families, and as such, 'there is no single per student ABSTUDY rate'.² The Scheme includes multiple supplementary payments and benefits that can affect the total

¹ Department of Social Services, ABSTUDY Policy Manual, available at <http://guides.dss.gov.au/sites/default/files/files/2016_ABSTUDY_Policy_Manual.pdf>.

² Department of the Prime Minister and Cabinet, Department of Education and Training, Department of Human Services, Department of Social Services, Department of Communications and the Arts, *Submission 43*, p. 12.

rate of assistance. These include living away from home allowances, travel allowances and additional incidentals.

- 2.4 In 2014-2015, nearly \$150 million was paid in secondary schooling ABSTUDY awards to 19 000 secondary school students alone. In the same year a further 9 500 students were in receipt of an ABSTUDY tertiary award.³
- 2.5 The provision and administration of ABSTUDY was of central concern to the Committee's inquiry. Indeed, a majority of participants in the inquiry expressed concern about the policies or administration arrangements of ABSTUDY, with many recounting very unfortunate personal experiences with the system.
- 2.6 This chapter does not recite ABSTUDY policy. Rather, the purpose of this chapter is to report the community's significant concerns about access to and implementation of ABSTUDY.
- 2.7 Broadly, concerns can be grouped into the following:
 - Concerns regarding the ABSTUDY arrangements for students who board, including:
 - \Rightarrow Census dates,
 - \Rightarrow Retention of students, and
 - \Rightarrow Ensuring quality outcomes
 - Administrative concerns, including language and literacy challenges when completing application forms, as well as significant time delays in processing forms, leaving children without access to a school.

Community concerns

Boarding and ABSTUDY

- 2.8 A principal concern related to ABSTUDY arrangements was for students who board. Students who live away from home in order to access schooling may stay with other family members, in group houses, in hostels, at boarding schools, or at residential schools. ABSTUDY can be paid in all of these circumstances, and assists with the costs of travel, accommodation and the associated costs of going to school.
- 2.9 The maximum amount a secondary school student can have approved for funding to live away from home is \$25,356.36 per annum (as of 1 July

³ Department of Prime Minister and Cabinet, the Department of Education and Training, the Department of Human Services, the Department of Social Services and the Department of Communications and the Arts *, Submission 43*, pp. 11-12.

2015).⁴ These payments may be paid to the hostel or boarding school directly on the students' behalf. Alternatively, students boarding privately usually receive payments fortnightly and can choose for them to be directed to the student, the parent, or the boarding provider.⁵

2.10 The community expressed concerns regarding school census dates, retention of students and the consequences for payments and ensuring quality outcomes. Each of these is addressed below.

Census dates

- 2.11 Where a student is boarding, ABSTUDY payments are made to the school at the beginning of the term, following the census date (the third Friday of the new term). Two issues were raised by the community about census dates.
- 2.12 The first of these concerns was the lack of flexibility in circumstances where a student moves after the census date from one school to another school. A student may commence a term at boarding school but due to the personal challenges, may soon leave. In such situations, the new school enrolling the student is not being appropriately resourced to supply that education for the remainder of a school term.⁶
- 2.13 In 2014, ABSTUDY benefits were paid to over 200 boarding schools and hostels on behalf of over 4 300 students.⁷ However, a joint submission from the Departments of the Prime Minister and Cabinet, Education and Training, Human Services, Social Services and Communications and the Arts noted that 'while many students thrive in the boarding school environment, some do not', and consequently 'around one third of ABSTUDY school students in formal boarding arrangements move on and off payments during a school year'.⁸ This in itself is a serious problem.

⁴ Department of Prime Minister and Cabinet, the Department of Education and Training, the Department of Human Services, the Department of Social Services and the Department of Communications and the Arts *, Submission 43*, p. 19

⁵ Department of Prime Minister and Cabinet, the Department of Education and Training, the Department of Human Services, the Department of Social Services and the Department of Communications and the Arts *, Submission 43*, p. 20.

⁶ Mr Anthony Gerard Bennett, Manager, Wiltja Boarding, Department for Education and Child Development, *Proof Committee Hansard*, 26 February 2016, p. 24.

⁷ Department of Prime Minister and Cabinet, the Department of Education and Training, the Department of Human Services, the Department of Social Services and the Department of Communications and the Arts *, Submission 43*, p. 11.

⁸ Department of Prime Minister and Cabinet, the Department of Education and Training, the Department of Human Services, the Department of Social Services and the Department of Communications and the Arts *, Submission 43*, p. 13.

- 2.14 The second concern raised by the community was that students may not be able to arrive at the school prior to the census date and therefore the school is required to absorb the costs for the remainder of the term.
- 2.15 The Association of Independent Schools of the Northern Territory commented that bad weather can prevent students from enrolling in school because they have no transport access between remote communities:

The conditions imposed by ABSTUDY having a census day in the third week of every term means that invariably a significant percentage of students are not counted and each boarding school is only funded for the time that a student is present. Almost always these delays in students arriving are not within the control of the schools. Yet the schools must have their full teaching and boarding staff in place from the beginning of term. We are unable to be flexible enough with staffing to meet the staggered return of students. Schools are punished due to circumstances that are beyond their control.

We have been advised that where the delay to a student commencing school is due to a weather or cultural event outside of the schools control the school can seek a waiver from DHS/Centrelink on the census date requirement. As yet no school has successfully achieved such a waiver.⁹

2.16 Responding to these concerns, the Department of Human Services advised the Committee:

The current policy that we adhere to is that we pay the term in advance to a boarding school or hostel on the basis that the student has commenced study by the third Friday of the school term. If there are some extenuating circumstances, we can look at those reasons or, similarly, if they could not commence in the first three weeks of term we can pay a pro rata amount to the school as well.¹⁰

2.17 The Committee asked the Department of Human Services to confirm whether any school had successfully received a waiver. In writing, the Department provided the following partial response:

The department does consider exceptional circumstances that lead to the late commencement of secondary studies and has paid

⁹ Association of Independent Schools of the Northern Territory, Submission 9, p. 7.

¹⁰ Mrs Melissa Ryan, Participation Division, Department of Human Services, *Proof Committee Hansard*, Canberra, 19 April 2016, p. 11.

ABSTUDY to education institutions for the full school term in these circumstances.¹¹

2.18 The Department did not provide any further details about these arrangements, or the numbers involved.

Retention of students

- 2.19 To ensure that ABSTUDY funding is provided to the school where the student is currently enrolled, Boarding Australia recommended that a 'retention supplement' or 'staged payments according to outcomes' could overcome these challenges.¹²
- 2.20 Boarding Australia also expressed frustration that existing ABSTUDY arrangements provide very little support to schools to ensure boarding students return to school after visiting home during school holidays or for leaving to attend cultural activities during the school term. Boarding Australia stated:

ABSTUDY at the moment provides a very perverse incentive. Each student is allowed two cultural trips per year. I am not saying that is a bad thing. There needs to be some mechanism, but at the moment the kids know and families know that twice a year they can go home for cultural reasons. It is often very unhelpful, and often the kids do not come back. When it is used appropriately, it is brilliant, but there is room there for a perverse outcome.¹³

- 2.21 The Departments did not respond to these concerns or suggestions at public hearings or in supplementary submissions to the inquiry.
- 2.22 One boarding facility, Wiltja, has now overcome the constant demands that students return home for extended family funerals by developing a formal letter of sympathy which has satisfied all parties.

Ensuring quality outcomes

2.23 As currently administered, ABSTUDY payments for boarding arrangements are not tied to engagement or retention of students nor the provision of quality of education and support. ABSTUDY 'simply provides access' to education.¹⁴ This was a concern for Boarding Australia:

¹¹ Department of Human Services, *Submission* 43.2, p. 1.

¹² Boarding Australia, Submission 7, p. 2.

¹³ Mr Anthony Gerard Bennett, Manager, Wiltja Boarding, Department for Education and Child Development, *Proof Committee Hansard*, Adelaide, 26 February 2016, p. 26.

¹⁴ Mr Anthony Gerard Bennett, Manager, Wiltja Boarding, Department for Education and Child Development, *Proof Committee Hansard*, Adelaide, 26 February 2016, p. 24.

ABSTUDY, as great a facilitator as it is, has not made that jump yet to say, 'We will pay for the outcome of that access, not just the access.'¹⁵

The ABSTUDY system simply provides access to secondary education. It is not linked or tied to engagement or retention. None of that is factored into the current system. My belief is that the system basically has not been reviewed since the 1970s, when it was set up to provide access. It is a laudable notion, but it needs to be linked very clearly to engagement and, therefore, retention and outcomes. There are a number of policy settings at the minute within ABSTUDY which in fact encourage the revolving door of Indigenous boarding and cherry picking.¹⁶

2.24 Furthermore, the absence of enforced standards has meant that a number of informal boarding arrangements operate with very little or no regulation. Boarding Australia stated that it was aware of a number of providers of 'pseudo-boarding' – 'private individuals who offer accommodation to Indigenous students in return for payments provided by ABSTUDY'. Boarding Australia reflected that 'the quality and safety of these operations, delivered outside of any formal scrutiny or accreditation, cannot be assured'.¹⁷ The organisation commented:

At the minute anybody can make application to ABSTUDY to acquire funding. There is no audit; there is no check—nothing. There are no standards upon which a check could be made.¹⁸

2.25 The Committee raised the issue of 'informal' boarding arrangements with the Department of Social Services. The Department advised it was aware of approximately 300 such arrangements and that:

> We do not have any role in looking at the quality of that particular arrangement. It is the parent who decides to direct the funding that goes to that family. They decide to direct a portion of that to another party. Then there is an administrative arrangement

. . .

¹⁵ Mr Daniel Cox, Chief Executive Officer, Boarding Australia, *Proof Committee Hansard*, Adelaide, 26 February 2016, p. 22.

¹⁶ Mr Anthony Gerard Bennett, Manager, Wiltja Boarding, Department for Education and Child Development, *Proof Committee Hansard*, Adelaide, 26 February 2016, p. 24.

¹⁷ Boarding Australia, Submission 7, p. 2.

¹⁸ Mr Anthony Gerard Bennett, Manager, Wiltja Boarding, Department for Education and Child Development, *Proof Committee Hansard*, Adelaide, 26 February 2016, p. 23.

through Human Services to make that happen. But, from a quality standard point of view, no, we do not.¹⁹

2.26 The Department further reported that while some states have regulations to ensure police checks and/or working with children checks, not all states and territories had such arrangements.²⁰ The Department informed the Committee that it was aware of the concerns about informal boarding arrangements that had been raised during the inquiry, and that it was 'certainly something that we are thinking about'.²¹

Administrative concerns

- 2.27 A large number of participants in the Committee's inquiry stated that many families have difficulty completing ABSTUDY forms,²² with some recommending better support be provided by government to assist families seeking to access ABSTUDY for their children.²³
- 2.28 For example, the Association of Independent Schools of the Northern Territory stated:

the ABSTUDY process in the Northern Territory is asking people who are partly nomadic, marginally literate in the English language and with negligible understanding of the use of money or its value to operate within the ABSTUDY application process and its ongoing processes. No matter how the process is modified within the requirements of [the Department of Human Services] DHS, the processes will still be designed for the dominant user group and remain mystifying for the vast majority of remote Indigenous families. Even with support offered by DHS officers and the Principals of local government primary schools, applications are still rejected because they are not correctly completed to DHS requirements.²⁴

2.29 More specifically, the community also reported difficulties to the Committee because birth certificates and permanent street addresses were

- 20 Ms Emma-Kate McGuirk, Branch Manager, Work and Study Payments, Department of Social Services, *Proof Committee Hansard*, Canberra, 19 April 2016, p. 11; Mr Andrew Whitecross, Branch Manager, Rates and Means Testing Policy Branch, Department of Social Services, *Proof Committee Hansard*, Canberra, 19 April 2016, p. 11.
- 21 Ms Emma-Kate McGuirk, Branch Manager, Work and Study Payments, Department of Social Services, *Proof Committee Hansard*, Canberra, 19 April 2016, p. 11.
- 22 For example: Catholic Agricultural College, *Submission 5*, p. 1; Association of Independent Schools of the Northern Territory, *Submission 9*, p. 6.
- 23 For example: Catholic Agricultural College, *Submission 5*, p. 1.
- 24 Association of Independent Schools of the Northern Territory, Submission 9, p. 6.

¹⁹ Ms Emma-Kate McGuirk, Branch Manager, Work and Study Payments, Department of Social Services, Proof Committee Hansard, Canberra, 19 April 2016, p. 11.

required by ABSTUDY application processes, and in some cases this had made application processes much more difficult for students and their families.²⁵ The Department of Human Services informed the Committee that birth certificates are no longer required where the student is under 16 years of age. Where the student is over 16, alternative identifications are accepted by the Department.²⁶

2.30 At a public hearing, the Department of Human Services was eager to promote its 'staff-assisted claim' process whereby ABSTUDY applications could be made completely over the phone:

a parent can phone a 1800 number, and our trained staff can help them, with the aid of interpreters as well, work through and answer the relevant questions to fast-track the processing of that claim. There may be some delays in processing, usually because we need a customer declaration form to come back, to certify that the information that we have collected on behalf of that parent is actually correct. But we will do follow-up calls as well to say, 'Send this declaration in, and then we can finalise your claim.' We have agents and we have Indigenous service officers around Australia to help facilitate the processing of those claims. The latest advice I have is that the majority, in excess of 80 per cent, of the claims are now done through staff-assisted claims over the phone.²⁷

- 2.31 The Department of Human Services informed the Committee that it promotes the 'staff-assisted claim' process and the 1800 number online and on the front page of the ABSTUDY form.²⁸
- 2.32 Following the hearing, the Department advised the Committee in writing that in the current financial year to date, 76.2 per cent of ABSTUDY claims have been processed via the staff-assisted channel. However the Department advised that it could not provide the geographical location of these applications as the data was not captured.²⁹ No evidence taken from

²⁵ For example, Mr Greg Cousins, Co-ordinator, Wiltja Secondary College, Windsor Gardens, *Proof Committee Hansard*, Adelaide, 26 February 2016, p. 5.

²⁶ Mrs Melissa Ryan, Participation Division, Department of Human Services, *Proof Committee Hansard*, Canberra, 19 April 2016, p. 9.

²⁷ Mrs Melissa Ryan, Participation Division, Department of Human Services, *Proof Committee Hansard*, Canberra, 19 April 2016, p. 8. See also Department of Prime Minister and Cabinet, the Department of Education and Training, the Department of Human Services, the Department of Social Services and the Department of Communications and the Arts, *Submission 43*, p. 13.

²⁸ Mrs Melissa Ryan, Participation Division, Department of Human Services, *Proof Committee Hansard*, Canberra, 19 April 2016, p. 9.

²⁹ Department of Human Services, Submission 43.3, p. 1.

parents indicated they were aware of or had used the staff assisted channel.

- 2.33 In addition to these challenges, the Committee repeatedly heard that the time taken to process ABSTUDY forms had meant that children were not able to commence the 2016 school year. For example, the Committee heard on Thursday Island that secondary school students were prevented from commencing the new school year because ABSTUDY application processes had not been finalised by the Department of Human Services. The Committee heard this evidence in week five of the school year, meaning that students had missed a considerable part of the first term.
- 2.34 These concerns were echoed by Boarding Australia:

we also have a situation at the moment, which has been going on for quite some years, that the administrative structure, the bureaucracy of ABSTUDY, is causing extremely long delays in the processing system. The details do not matter, but it effectively means that many kids are being denied access to secondary ed[ucation] for periods of up to six months.³⁰

- 2.35 The Department also advised that the average number of days to process a claim has been 21 days in the current financial year to date.³¹
- 2.36 At a public hearing in April, the Departments of the Prime Minister and Cabinet, Human Services and Social Services reported that they were working collaboratively to rectify some of these issues.³² The Departments' joint submission similarly stated:

The Departments of Social Services, Human Services and the Prime Minister and Cabinet are currently looking into ways to further simplify ABSTUDY as part of the Government's response to recommendations in the Creating Parity and McClure Welfare Review reports.³³

³⁰ Mr Anthony Gerard Bennett, Manager, Wiltja Boarding, Department for Education and Child Development, *Proof Committee Hansard*, Adelaide, 26 February 2016, p. 28.

³¹ Department of Human Services, *Submission* 43.3, p. 1.

³² Ms Liz Hefren-Webb, First Assistant Secretary, Schools, Information and Evaluation, Department of the Prime Minister and Cabinet, *Proof Committee Hansard*, Canberra, 19 April 2016, p. 7.

³³ Department of Prime Minister and Cabinet, the Department of Education and Training, the Department of Human Services, the Department of Social Services and the Department of Communications and the Arts *, Submission 43*, p. 13.

Reviews of ABSTUDY

- 2.37 Gains in Indigenous educational outcomes are subject to regular monitoring through the annual Closing the Gap reporting. While the stated objective of ABSTUDY is to improve Indigenous educational outcomes, there has been little change to its eligibility criteria or administration, and little analysis of its effectiveness over the last decade.
- 2.38 Several Australian National Audit Office reports have addressed broader issues such as Indigenous service delivery and the provision of boarding facilities by the Commonwealth.³⁴ These reports make mention of the ABSTUDY scheme but evaluation of its administration is not part of the audit inquiry.
- 2.39 There have been a number of Departmental reports which have reported on Indigenous education outcomes and included a review on some aspects of the ABSTUDY scheme. For example, in 2006 the Department of Finance and Administration released the report *Evaluation of the Indigenous Education Strategic Initiatives Programme*³⁵ which considered ABSTUDY in the context of reviewing the effectiveness of providing travel allowances and fares to Indigenous students participating in distance education.
- 2.40 Similarly, in 2006 the Department of Education, Science and Training released its review into the impact of ABSTUDY policy changes that came into effect in 2000.³⁶ Also in 2006, the Department of Education, Science and Training released a further report *Improving indigenous outcomes and enhancing indigenous culture and knowledge in Australian higher education.*³⁷
- 2.41 These reports do not appear to have resulted in any significant changes to ABSTUDY to improve its administration or outcomes.
- 2.42 In 2012, the Department of Industry, Innovation, Science, Research and Tertiary Education released the *Review of Higher Education Access and*

- 35 Department of Finance and Administration, Evaluation of the Indigenous Education Strategic Initiatives Programme - Away-from-Base for 'Mixed-Mode' Delivery (IESIP-AFB), Office of Finance and Audit, Report No. 1-2006, Canberra, 2006.
- 36 Department of Education, Science and Training, *Review into the impact of ABSTUDY policy changes that came into effect in 2000*, Strategic Analysis and Evaluation Group, Department of Education, Science and Training, Canberra, 2006.
- 37 Department of Education, Science and Training, *Improving indigenous outcomes and enhancing indigenous culture and knowledge in Australian higher education: report to the Minister for Education, Science and Training, Indigenous Higher Education Advisory Council, Canberra.*

³⁴ ANAO, Audit Report: Initiatives to Support the Delivery of Services to Indigenous Australians, June 2014, available at <https://www.anao.gov.au/work/performance-audit/initiatives-supportdelivery-services-indigenous-australians>; ANAO, Audit Report: Indigenous Secondary Student Accommodation Initiatives, October 2011, available at <https://www.anao.gov.au/work/performance-audit/indigenous-secondary-studentaccommodation-initiatives>.

Outcomes for Aboriginal and Torres Strait Islander People. While not considering ABSTUDY in detail, this report did find that:

Changes to ABSTUDY with the aim of aligning the means tests and payment rates with those of Youth Allowance and Newstart took effect from 1 January 2000. There was a sharp decline in higher education Indigenous enrolments in 2000 and ABSTUDY recipient numbers in higher education declined significantly in 2002 and 2003 (DEST, 2004). It is likely that both the means test and the payment rates need urgent reconsideration.³⁸

Committee comment

- 2.43 For a program whose objective suggests it is an integral component of the Government response to addressing Indigenous educational disadvantage, it is concerning that there has been no serious comprehensive evaluation of the scheme's administration, eligibility criteria, delivery or outcomes.
- 2.44 Although this Committee has not been able to complete its full inquiry, the repeated concerns raised by the community in relation to ABSTUDY are of such critical importance that the Minister's consideration of these issues should not be postponed.
- 2.45 The Committee is extremely concerned that government programs are preventing children from attending school for up to six months. The seriousness of this situation is magnified when considering the national efforts from governments and communities alike to increase attendance at school under the Closing the Gap targets.
- 2.46 The Committee also believes that ABSTUDY should not just facilitate access to schooling. Rather, the Committee fully supports the comment made by Boarding Australia that ABSTUDY has the potential to be 'a lever for quality'.³⁹ The Committee is concerned that current ABSTUDY arrangements leave the program open to private, informal or 'pseudo-boarding' facilities with little assurances offered to parents as to their quality or safety despite receiving public funds from the Commonwealth. This problem is exacerbated by the absence of regulations of boarding facilities in some states and territories.

³⁸ L Behrendt et al, Review of Higher Education Access and Outcomes for Aboriginal and Torres Strait Islander People: Final Report, Department of Industry, Innovation, Science, Research and Tertiary Education, Canberra, 2012 p.16

³⁹ Mr Daniel Cox, Chief Executive Officer, Boarding Australia, Proof Committee Hansard, Adelaide, 26 February 2016, p. 22.

- 2.47 The Committee notes positive initiatives such as outreach services and telephone assisted application service, and appreciates that this services is being used by over 76 per cent of applicants. However, it is clear from the Committee's travel to numerous urban, regional and remote locations around Australia, that many communities and schools are not aware of the service and may not be submitting applications due to complexity of forms and language barriers.
- 2.48 It is the view of the Committee that the success of this and other outreach services should not be measured by the percentage that use assisted services. These figures do not capture those unaware of the services, those intimidated by the application process and language barriers, or lack of information technology skills or those utilising teachers or other private assistance to aid completion.
- 2.49 The Committee sought further information from the Department which would have shown the geographical location of those using the telephone assisted and outreach services. The Department advised the Committee that it did not hold this data. The Committee believes that such data would not only show where the Department's initiatives were having the greatest effect, but also show where more concentrated awareness raising and assistance should be focussed.
- 2.50 Furthermore the Committee finds it absurd that when Departmental officers were advised that numerous remote communities and regional schools appeared unaware of these services, their response was to reiterate that the provision of specialist assistance (including language and translator support) is promoted online and on the cover of the 63 page application form. Clearly, promotion of these vital assisted services needs a more targeted and appropriate delivery.
- 2.51 The Committee notes that officers from Department of the Prime Minister and Cabinet chair an interdepartmental committee with representatives from the Department of Social Services, the Department of Human Services and the Department of Education and Training. This interdepartmental committee has been meeting for the 'last six to nine months' and has been working to follow up with issues that have been raised by the community through this inquiry process.⁴⁰ Importantly however, there is no certainty, transparency or community consultation about the outcomes or timeframes of initiatives that might address the concerns raised.

⁴⁰ Ms Liz Hefren-Webb, First Assistant Secretary, Schools, Information and Evaluation, Department of the Prime Minister and Cabinet, *Proof Committee Hansard*, Canberra, 19 April 2016, p. 7.

- 2.52 ABSTUDY has proved to be an important facilitator for access to education, and secondary and tertiary education in particular. Yet, as noted above, significant problems exist and no formal, targeted review of the system has been undertaken in recent memory. The Committee notes that some of the issues raised relate to the administrative complexity of the scheme, others suggest that the scheme is not responsive to actual need and circumstances of students, and some issues reflect community perceptions, misunderstandings or lack of awareness regarding assistance available.
- 2.53 While acknowledging the existence of the interdepartmental committee and that it has monitored the issues raised to date in this inquiry, the Committee considers that the scope of failings of ABSTUDY demands a more formal review and redesign of how Government successfully assists with the costs associated with study away from home and addresses Indigenous educational disadvantage.
- 2.54 Therefore the Committee recommends a formal review and overhaul of ABSTUDY, with a view to the program being redesigned and submitted to Government for approval. Following the Government's approval, a six month implementation and public education period should commence, with the new system being fully operational by at least 30 June 2017.

Recommendation 1

The Committee recommends that the Department of Human Services undertake an independent review of ABSTUDY with a view to the program being redesigned and the new system being fully operational at the latest by 30 June 2017.