

Performance Audit on the Administration and Management of Bus Fare Assistance through E-Ticketing for the School Children, Elderlies and Persons with Disability

ETransport





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OFFICE OF THE AUDITOR-GENERAL – REPUBLIC OF FIJI

Location	: Level 8, Ratu Sukuna House		
	2-10 MacArthur Street		
	Suva, Fiji		
Postal	: P O BOX 2214, Government Buildings		
Address	Suva, Fiji		
Telephone	: (679) 330 9032		
Email	: info@auditorgeneral.gov.fj		
Website	: <u>www.oag.gov.fj</u>		

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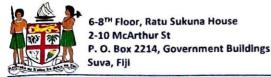
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10 July 2020

The Honorable Ratu Epeli Nailatikau Speaker of the Parliament of the Republic of Fiji Government Buildings Constitution Avenue SUVA

Dear Sir

AUDIT REPORT ON PERFORMANCE AUDIT ON THE ADMINISTRATION AND MANAGEMENT OF BUS FARE ASSISTANCE THROUGH E-TICKETING FOR SCHOOL CHILDREN, ELDERLIES AND PERSONS WITH DISABILITY

In accordance with section 152(13) of the Constitution of the Republic of Fiji, I am pleased to transmit to you my Performance Audit report on the Administration and Management of Bus Fare Assistance through E-Ticketing for School Children, Elderlies and Persons with Disability.

A copy of the report has been submitted to the Minister for Economy who as required under section 152(14) of the Constitution shall lay the report before Parliament within 30 days of receipt, or if Parliament is not sitting, on the first day after the end of that period.

Yours sincerely

Aiav Nand **AUDITOR-GENERA** Encl. FU

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The Auditor-General must submit a report on performance audits carried out to Parliament. In addition, a single report may include two or more audits. This report satisfies these requirements.

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Audit Overview

Our audit was carried out to ascertain the efficiency and effectiveness of government's Bus Fare Assistance program through E-Ticketing for the school children, elderlies and persons with disability. Given the sustainable development objectives of the Fiji Government as prioritised in the National Development Plan, the provision of bus-fare assistance through e-ticketing is a government initiative targeted at providing and promoting 'quality education for all', ' social inclusion and empowerment', 'youth development' and 'women and gender equality'.

Education is generally regarded as one of the fundamental factors of development. Countries continue to increase investments in human capital in order to achieve sustainable economic development. Education enriches people's understanding and improves the quality of life for themselves and the community in which they live. Education improves productivity, creativity and promotes entrepreneurship and technological advances. Such advancements promote economic and social progress and distribution of income.¹

Bus-fare assistance through e-ticketing to school children from low income families attempts to ensure that all school children have access to quality education.

We also looked at the administration of the program in terms of how the program is administered through the various policies and framework which governs its operations. However, the scope of this audit does not cover the acquisition of the services of the e-ticketing provider.

Our audit also covered the management of the program by examining the various functional roles undertaken by the Ministry of Education and Department of Social Welfare. Through this, we looked at how the program is managed by these two entities.

Finally, our audit looked at the monitoring and reporting of the program and how the information maintained by the e-ticketing service provider is scrutinised, analysed and reported upon by the Ministry of Education and Department of Social Welfare.

¹ Ilhan OZTURK 2001 THE ROLE OF EDUCATION IN ECONOMIC DEVELOPMENT: A THEORETICAL PERSPECTIVE Çağ University, Faculty of Economics and Administrative Sciences, Department of Economics, Mersin, Turkey. Email: ilhanozturk@cag.edu.tr

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Acronyms

Abbreviation	Meaning	
ACP	Annual Corporate Plan	
DSW	Department of Social Welfare	
FRCS	Fiji Revenue and Customs Services	
MEHA	Ministry of Education Heritage and Arts	
MoE	Ministry of Economy	
MOU	Memorandum of Understanding	
MWCPA	Ministry of Women Children and Poverty Alleviation	
M Paisa	E-ticketing service provider's Money Transfer Service	
NDP	National Development Plan	
PSEHA	Permanent Secretary For Education, Heritage and Arts	
SDG	Sustainable Development Goals	
SOP	Standard Operating Procedures	
TAU	Transport Assistance Unit	
VKB	Vola-Ni-Kawa Bula	

EXECUTIVE SUMMARY

The Bus Fare Assistance program through electronic ticketing was implemented in 2017 to assist school students from low income earning families to attend school, the elderly and the disabled to be able to travel when required. This program is aligned to the 5 Year and 20 Year National Development Plan. E-transport assistance was implemented for fundamental reasons; firstly for students to reduce the financial burden on parents who are unable to afford transportation costs involved in sending children to school while at the same time enable students to gain access to quality education and promoting equality; secondly to recognise the contribution of senior citizens and disabled persons in the country. A bid to support them and ensure that the elderly are able to commute at an affordable rate and also ensuring transport accessibility for the disabled.

The current stakeholders directly involved in the Bus Fare assistance program are the Ministry of Education Heritage and Arts (MEHA) who administer and manage student's bus fare assistance and the Department of Social Welfare (DSW) of the Ministry of Women Children and Poverty Alleviation which administers and manages the elderly and disabled's bus fare assistance program. The external stakeholder is the sole service provider of e-ticketing service machines and top-up platforms. The relationship between the Department of Social Welfare and the e-ticketing service provider is founded in an undated agreement which stipulates the duties and responsibilities of each party. The Ministry of Education is yet to formulate a similar agreement with the e-ticketing service provider.

A total of 88,579 students received transport assistance vouchers in 2009 when it started while 80,879 elderly and disabled persons received 50% concession voucher in 2011. In 2017, the e-ticketing process for bus fare was implemented and by Term 3 of 2019, a total of 66,674 students and about 51,444 ²senior citizens and persons with disability received e-transport cards to utilise e-ticketing.

The elderly and disabled persons received full 100% assistance for their fare at the maximum value of \$40 per month in 2018. Students living in rural areas that have no bus services still use vouchers to travel on carrier, minibuses and punts. Public funds amounting to \$100m³has been spent over 3 years since the assistance was delivered through the e-ticketing platform in 2017.

The Bus Fare Assistance program through e-ticketing has sufficient mandate under the constitution to enable it to be functional and effective in providing the required assistance to deserving school children, elderly and persons with disabilities. However, we determined that policies and procedures implemented to support the Cabinet decisions are outdated and need to be reviewed as they were prepared for the voucher system before the e-ticketing system was introduced. Similarly, the absence of an agreement between the external e-ticketing service provider with the Ministry of Education and undated agreement between the external e-ticketing service provider and Department of Social Welfare needs to be rectified to ensure that the interests of government are adequately protected.

Anomalies were found given the poor internal controls including lack of monthly reconciliations of records between the two government agencies and the e-ticketing service provider. There is also a need to work towards mitigating risks identified which can cause overpayment. These include the risk of over-payment of assistance through excessive top-ups, school fares paid beyond the school zones, payment of assistance to ineligible recipients, lack of declaration of interest by processing officers,

 ² https://www.fbcnews.com.fj/news/family-members-only-visiting-their-elderly-for-monetary-benefits/
 ³ Expenditure as extracted from FMIS on 25 Feb 2020

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and continued top-up of cards for deceased senior citizens. The risk of fraud for unused balances in cards also exist.

Generally, the system has been effective in providing bus fare assistance through the e-ticketing platform. However, utilisation of resources could be improved with an effective and accountable internal control system.

NA IVAKALEKA NI ITUKUTUKU

A sevu na Veivuke ni Vodovodo ni Basi (Bus Fare Assistance program) ena tikite livaliva (electronic ticketing) ena 2017, mera vukei kina na gonevuli mai na matavuvale dravuadravua mera lai vuli, kei ira na qase kei na vakaleqai vakayago. Qo e salavata kei na iTuvatuva ni Veivakatorocaketaki (National Development Plan) yabaki 5 kei na yabaki 20. E vica na vuna lelevu a caka kina na veivuke oqo: matai, me mamada kina na icolacola vei ira na itubutubu e dredre vei ira na saumi vodovodo, mera rawata talega kina na gone kece na vuli vinaka, se ra vakailavo se sega; karua, mera dokai kina na qase kei na vakaleqai vakayago ena nodra yaga e noda vanua. Kena inaki me tokoni ira, ka vakarawarawataka nodra veilakoyaki na qase ena ivodovodo era rawata, va kina vei ira na vakaleqai vakayago me rawa

Erau kauwai tiko ena Veivuke ni Vodovodo ni Basi na Tabacakacaka ni Vuli (Ministry of Education, Heritage and Arts, MEHA), nodra itavi na qarava na veivuke vei ira na gonevuli, kei na Tabana ni Veiqaravi Raraba (Department of Social Welfare, DSW) ni Tabacakacaka ni Marama (Ministry of Women, Children and Poverty Alleviation) ka qarava na veivuke vei ira na qase kei na vakaleqai. Dua talega na tabana mai tuba e kauwai kina, koya e qarava duadua na misini ni tikite livaliva kei na kedra tawani (top-up). Na veimaliwai ni Tabana ni Veiqaravi Raraba kei na tabana ni tikite e yavutaki ena veiyalayalati e virikotori kina na nodrau dui itavi. Se bera ni dua na veiyalayalati ni Tabacakacaka ni Vuli kei na tabana e qarava na tikite.

Se sevu e na 2009 na Veivuke ni Veilakoyaki (Transport assistance program) baleta na sala kece ni veilakoyaki, wili kina na basi, keria kei na boto. Ni sa cava na 2015, sa 88,579 na gonevuli era sa vukei 100%, qai 20,036 na qase kei na vakaleqai e soli nodra ivola (voucher) me musu e na 50% e na 2011. Ni sevu na veivuke ni vodovodo ni basi e na mua ni 2017, era le 51,109 na isevu ni itaba govenuli era vukei kina.

Ena ikatolu ni wasenivuli ni 2019, sa soli vei ira na le 66,674 na gonevuli kei na le 45,106 beka na qase kei na vakaleqai vakayago na tikite livaliva (e-transport card). Ena 2018 a soli kina vei ira na qase kei na vakaleqai nodra ivodovodo taucoko, me yacova na \$40 dua na vula. Na gonevuli era vakaitikotiko ena vanua e sega kina na basi era se vakayagataka tikoga na 'voucher' mera vodo keria kina se minibasi se boto. Sa yacova na \$115m na ilavo ni matanitu sa vakayagataki ena tikite livaliva ena yabaki va me tekivu ena 2017.

Me vaka ni vakadonui na Veivuke ni Vodovodo ni Basi ena Lawatu (constitution), e dodonu me mana ka maqosa ena nodra vukei kina na gonevuli, na qase kei ira na vakaleqai vakayago. Ia, keitou sa kunea ni kena ivakarau kei na icakacaka eso a vakaduri me muria kei na lewa ni Boseyaco era sa makawa ka dodonu me lesuvi, me vaka ni a vakarautaki me baleta na tikidua (voucher), qai sevu e muri na tikite livaliva. E leqa talega ni sega tu na veiyalayalati ni tabana ni tikite kei na Tabacakacaka ni Vuli qai sega na tikinisiga ena veiyalayalati ni tabana ni tikite kei na Tabana ni Veiqaravi Raraba, ia na leqa qo me wali me taqomaki kina na matanitu de yaco na leqa.

Sa kune na leqa eso, vu mai na malumalumu ni qaqarauni, wili kina ni sega tu na veidutaitaki (reconcile) vakavula ni itukutuku vakailavo ni tabana e rua ni matanitu kei na tabana ni tikite. E dodonu talega me sagai me wali na ririko eso sa kune ka rawa ni tini ena saumi ilavo vakasivia. Qo e wili kina na kena saumi vakasivia na veivuke baleta ni tawani sivia na tikite, saumi vodovodo ni gonevuli ena taudaku ni yalava ni koronivuli (zone), nodra vukei na sega ni dodonu me vukei, sega ni tusanaki na kauwai (declaration of interest), kei na kena tawani tikoga na tikite ni dua sa mate. E ririkotaki tale ga de tauri vakailavo na ilavo e vo tiko ena tikite.

Kena isoqoni, sa mana na veivuke ni rawa kina na vodo basi ena tikite livaliva. Ia, e rawa ni daumaka sara na vakayagataki ilavo ke toroi cake na itovo ni qaqarauni.

कार्यपालक सारांश

ई-टिकटिंग के द्वारा बस के भाड़े की कार्यक्रम 2017 में स्कूली छात्रों, कम धन कमाने वाले परिवार तथा बूढ़े तथा विकलांग लोगों को यात्रा की सहायता के लिए शुरु की गई थी। यह पाँच साल तथा बीस साल की राष्ट्रीय विकास योजना के अतिरिक्त है। कुछ मौलिक कारणों से ई-परिवहन सहायता लागू की गई थी; पहला स्कूली छात्रों के माता-पिता जो बच्चों को स्कूल भेजने की खर्च को सहे नहीं सकते उनकी आर्थिक दबाओ को कम करने के लिए तथा साथ-साथ में बच्चों को उत्तम्ता पढ़ाई तथा बराबरी देने के लिए; दूसरा बूढ़े नागरिकों तथा विकलांग लोग की देश के प्रति योगदान को सम्मान देने के लिए। एक सुरक्षित योजना जिससे बूढ़े लोग को सहायता दी जा सके ताकि वे कम मूल्य में घूम सके, तथा साथ में विकलांग लोगों को सवारी मिल सके।

बस किराया सहायता की कार्यक्रम के वर्तमान हिस्सेदार शिक्षा मंत्रालय, विरासत और कला (MEHA) जो बच्चों के भाड़े की सहायता की प्रशासन तथा देख भाल करते है और महिलाओं, बच्चों और गरीबी निवारण मंत्रालय की सामाजिक कल्याण विभाग (DSW) जो बूढ़े तथा विकलांग लोगों के भाड़े की सहायता की प्रशासन और देख भाल करते है। बाहरी हिस्सेदार जो इस में शामिल है वह ई-टिकेटिंग की मशीनों तथा टोप-अप मंच के एकमात्र सेवा प्रदान करने वाले है। सामाजिक कल्याण विभाग ई-टिकटिंग के सम्बन्ध इस समझौता पर आधारित है जो एक-एक हिस्सेदार की काम तथा जिम्मेदारी को निर्धारित करती है। शिक्षा मंत्रालय ई-टिकटिंग की सेवा प्रदान करने वाले के साथ अभी कोई समझौता पर नहीं आई है।

परिवहन सहायता कार्यक्रम हर यात्रा बस, केरिया तथा पंत जो 2009 में शुरु हुई थी को शामिल करता है। 2015 के अंत तक , कुल मिला के 88,579 छात्रों को 100% सहायता मिली जबकि 20,036 बूढ़े तथा विकलांग लोगों को 2011 में 50% छूट की वाउचर मिली। 2017 के अंतिम भाग में बस के भाड़े की ई-टिकटिंग काम को लागू की गई जिस में 51,109 छात्रों को पहिली बार सहायता मिली।

2019 की टेम 3 तक, कुल मिला के 66,674 छात्रों तथा 45,106 बूढ़े नागरिक तथा विकलांग लोगों को ई-परिवहन कर्ड्स ई-टिकटिंग को इस्तेमाल करने के लिए मिली थी। जिस में बूढ़े तथा विकलांग लोगों को 2018 में हर महीना \$40.00 याने की 100% सहायता मिली थी। बच्चे जो देहाती इलाके में रहते है जहां बस के सेवा नहीं है वह भी वाउचर का इस्तेमाल करते थे। यह बच्चे वाउचर केरिया, मिनी बस तथा पंत पर सवारी के लिए इस्तेमाल करते है। \$115 मिलियन सार्वजनिक धन पिछले चार सालो में ई-टिकटिंग मंच के द्वारा सहायता के लिए खर्च हुई है 2017 से।

ई-टिकटिंग के द्वारा बस के भाड़े की सहायता की कार्यक्रम के पास संविधान के नीचे योग्य स्कूली बच्चे, बूढ़े तथा विकलांग लोगों को जरूरी सहायता प्रदान करने के लिए कार्यात्मक तथा प्रभावी होने के लिए पर्याप्त अधिकार है। तथापि हमने यह विचार किया की जो नीतियाँ तथा प्रक्रिया को केबिनट के फैसले को निर्धारित करने के लिए लागू की गई थी वह कल ग्रस्त हो चुके है क्योंकि, वह वाउचर सिस्टम के लिए बनाये गए थे, ई-टिकेटिंग की आरंभ से पहिले। इसी तरह से कोई समझौता शिक्षा मंत्रालय तथा बहार के हिस्सेदार के बीच में न होना तथा सामाजिक कल्याण विभाग की बहार के हिस्सेदार के साथ की समझौता का कोई तारीख नहीं होना सरकार के भलाई के लिए सुधार होनी चाहिए।

सरकार के दोनों एजेंसी तथा ई-टिकटिंग सेवा प्रदान करने वाले के बीच में कमजोर भीतरी नियंत्रण के कारण खामियों को पीई गई थी। यहाँ यह भी जरूरी है की काम किया जाए आने वाले संकटों को रोकने के लिए जिससे अधिक भुगतान हो सकती है। इन संकटों में शामिल है ज्यादा टोप-अप के कारण अधिक भुगतान, स्कूली क्षेत्र से ज्यादा स्कूल भाड़े की भराई, अयोग लोगों को सहायता, हित कि घोषणा की कमी, तथा मारे हुए बूढ़े नागरिकों की काड पर टोप-अप। काड में बचे हुए पैसे को धोके से इस्तेमाल करने की संकट।

व्यापक रूप से, यह सिस्टम ई-टिकटिंग के माध्यम से बस के भाड़े को प्रदान करने में काफी प्रभावी रही है। लेकिन, उत्तरदायी भीतरी नियंत्रण प्रणाली से साधनों के इस्तेमाल को सुधारा जा सकता है।

Key Findings and Recommendations

Coverage

The audit on the Administration and Management of Bus Fare Assistance through e-Ticketing for school children, disabled and the elderly focusses on three areas; namely the 'Administration of the Program', 'Management of the Performance of the Program', and 'Data Analytics'.

Key findings Administration of the Program

- The Ministry of Education is yet to review its policy which was due for review in 2016 whilst the Department of Social Welfare is yet to develop a policy framework for e-transport services.
- The Ministry of Education is yet to review its Policy on Transport Assistance and Standard Operating Procedures (SOPs) to include the responsibility of the e-ticketing service provider to outline the reporting responsibility as required under the Electronic Fare Ticketing Act 2014. SOPs prepared by the Department of Social Welfare are yet to be endorsed by the Permanent Secretary.
- There is no formal agreement (Service Level Agreement) between the Ministry of Education and the e-ticketing service provider.
- Review of the agreement between the Department of Social Welfare and the service provider highlighted gaps in the agreement that needs to be improved.
- Although complaints are recorded by the Units within the respective Ministry and Department, there is no clear process on the manner in which feedback is to be provided to the complainant.
- Policies and processes for declaration of conflict of interest for officers involved in the program have not been developed by the Ministry and Department to manage any conflicts.

Management of the Performance of the Program

- There has been an absence of acceptable data governance process where agreements are made to ensure that relevant information such as exception reports on the actual use of cards, travel patterns and behaviour of eligible students are captured and monitored.
- Regular reconciliation has not been carried out between the records kept by the Ministry and Department against the records kept by the e-ticketing service provider.
- The Department of Social Welfare does not have any mechanism within its processes which relates to exit of recipients from the bus fare assistance programs for senior citizens and persons living with disability.
- On 8 April 2020, the Monitoring and Evaluation Team of the Department of Social Welfare made eight recommendations as part of its evaluation of the program. As at May 2020, the Department had only addressed one recommendation.
- Our review of the MEHA internal audit report in May 2020 revealed six findings that are related to the Bus Fare Assistance program. For example,

inconsistencies were noted in the approval and rejection of applications on bus fare assistance provided on the zoning of students based on their residential address even though the head of school considerably monitors this limit. The TAU is working towards implementing the recommendations made in respect of these issues.

• A significant number of anomalies were noted in the student bus fare assistance application process which needs to be addressed by the Policy on Transport Assistance.

Data Analytics

- Other forms of ID were also accepted by the e-ticketing service provider apart from the ID issued by the Department of Social Welfare.
- In some cases, there were more than one user for one active ID.
- Monthly loading on Exempt and Concession cards, in some cases, were more than the approved monthly amount of \$40.
- There were also issues of funds being incorrectly transferred from one recipient ID to another.
- There were inconsistencies between the records maintained by the ticketing service provider and the Ministry of Education.

General

Recommendations

We recommend that the Ministry of Education reviews its Policy on Transport Assistance which was due for review in 2016 and also update the SOPs to address the risks associated with the Bus Fare Assistance program through eticketing, amend outdated information and incorporate the updated eticketing services application and guidelines.

Similarly, the Department of Social Welfare should develop a policy and finalise its SOPs which govern the operation of the Bus fare Assistance program for the elderly and persons with disabilities.

It is also recommended that the Ministry of Education enters into an agreement with the e-ticketing provider whilst the Department of Social Welfare should review the agreement with the e-ticketing service provider to ensure that the gaps identified in the current agreement is improved.

We also recommend that the processes of the Ministry of Education should be improved so that confirmation on income of parents of students applying for assistance under the program can be obtained from the Fiji Revenue and Customs Service. Similarly, the Department of Social Welfare should ensure that arrangements are made with the Registrar of Births, Deaths and Marriages to obtain timely confirmations on the age of senior citizens applying for assistance and those that are deceased.

We also recommend that the zoning policy is strictly adhered to for bus fare assistance given to school students.

The Ministry of Education and Department of Social Welfare should also take necessary steps to ensure the timely implementation of recommendations relating to the program made by the internal audit team and its Monitoring and Evaluations team.

Finally, there is a need for the Ministry and Department to regularly reconcile their records against the records maintained by the e-ticketing service provider to ensure that any anomalies are rectified on a timely basis to avoid wastage of funds. It is also recommended that the Ministry and Department obtain the detailed reports as required under the Electronic Fare Ticketing Act 2014.

OverallThe Bus Fare assistance program through e-ticketing for the school children, elderlies**Conclusion**and the disabled have positively impacted the lives of many people.

Based on our findings in this report, the delivery of the program can be improved through the development and update of policy framework and SOPs by both the Ministry of Education and Department of Social Welfare. Signed agreements which define the roles and responsibilities of the e-ticketing service provider and the government agencies involved in the delivery of the program would ensure that the interests of government are adequately protected. Access to specific reports from the e-ticketing service provider can enhance the reconciliation process based on which payments are made.

Therefore, whilst the program has been beneficial for the targeted population, more effort is still needed in terms of the overall governance to further improve the delivery of the program.

SOQONI NI MACALA KEI NA VAKATUTU

Dikevi

Na kena dikevi vaka daunifika na Qaravi ni Veivuke ni Vodovodo ni Basi ena Tikite Livaliva baleti ira na Gonevuli, Vakaleqai Vakayago kei na Qase e basogai tolu: 'Qaravi ni Porokaramu', 'Qarauni ni Cakacaka ni Porokaramu', kei na Dikevi ni Fika'

Kena macala Qaravi ni Porokaramu

- Na Tabacakacaka ni Vuli sebera ni lesuva na kena polisi, ka lokuci me lesuvi ena 2016, ia na Tabana ni Veiqaravi Raraba se bera ni bulia na kena polisi baleta na porokaramu qo.
- Na Tabacakacka ni Vuli se bera ni lesuva na kena polisi ni Veivuke ni Veilakoyaki kei na iTovo Tudei ni Cakacaka (Standard operating Procedure,SOP) me okati kina na itavi ni tabana ni tikite livaliva me dau tukutuku, me vaka e lavaki ena kena lawa (Electronic Fare Ticketing Act 2014). Na iTovo Tudei ni Cakacaka sa vakarautaka na Tabana ni Veiqaravi Raraba se bera ni vakadonuya na Vunivola Tudei.
- Sega tu na veiyalayalati (Service Level Agreement) ni Tabacakacaka ni Vuli kei na tabana ni tikite.
- Ni dikevi na veiyalayalati ni Tabana ni Veiqaravi Raraba kei na tabana ni tikite, a kune eso na tikina malumalumu ka dodonu me vaqaqacotaki.
- Dina ni a ciqomi na kudru ka vakai volataki ena kena tabacakacaka kei na Tabana, e sega tu na ivakatutu matata ni vakau ni kena isau vei koya a kudru.
- Sega tu na polisi se ivakarau ni tusanaki ni kauwai (conflict of interest) vei ira na vakalesilesi ni porokaramu ena Tabacakacaka se Tabana, de tubu na veibeitaki.

Qarauni ni Cakacaka ni Porokaramu

- E sega talega na ivakarau tudei e ganita me vu ni veiyalayalati baleta na kena vakaivolataki ka qarauni na itukutuku yaga eso, me vaka na itukutuku ni vakayagataki tikite, veilakoyaki ni pasidia,kei nodra itovo na gonevuli.
- Sega tu ni caka na veidutaitaki (reconciliation) ni itukutuku vakailavo ni Tabacakacaka kei na Tabana, kei na itukutuku vakailavo ni tabana ni tikite.
- Na Tabana ni Veiqaravi Raraba e sega kina na ivakarau me baleta nodra sa Vakacegu mai na porokaramu na qase kei na vakaleqai vakayago.
- Ena 8 Epereli 2020, eratou a dikeva na porokaramu na Mataveivaqaqai (Monitoring and Evaluation Team) ni Tabana ni Veiqaravi Raraba, qai walu nodratou vakatutu. Me yacova na Me 2020, sa cakacakataka na Tabana e dua walega na vakatutu.
- Neitou lesuva na itukutuku ni dikevi ni veika vakailavo ni Tabacakacaka ni Vuli ena Me 2020, a kunei kina e ono na leqa baleta ba Veivuke ni Vodovodo ni Basi. E dua, a kune ni duidui tu na kedra ciqomi se sega na kere veivuke ni vodovodo ni basi ni laurai vata kei na nodra tiko se sega ena yalava ni koronivuli, dina ni dau yadrava na tabana qo o qasenivuli liu. Sa saga tiko na Tabani Veiqaravi me cakacakataka na vakatutu ena vica na tikina qo.
- Vica toka na leqa a kune ena cakacakataki ni kere veivuke ni vodovodo ni basi, e dodonu me wali ena Transport Assistance Policy.

Dikevi ni Fika

• A ciqoma na tabana ni tikite e so tale na mataqali ivakadinadina (ID), sega ni o koya walega a solia na Tabana ni Veiqaravi Raraba.

- E so na ivakadinadina (ID) e sega ni vakayagataka wale ga e lewe dua.
- E so vei ira na vakatikite ni Vakaleqai se Qase era sivita na ilavo yalataki ni \$40 dua na vula.
- A kune talega ni so na ilavo e vakadewataki cala kina dua tale na ivakadinadina (ID)
- Rau veiveicalati na itukutuku maroroi ni tabana ni tikite kei na itukutuku ni tabacakacaka ni vuli.

Vakatutu Raraba

Keitou vakatura me lesuva na Tabacakacaka ni Vuli na kena polisi ni Veivuke ni Veilakoyaki, me a lesuvi ena 2016, qai vakavouya na itovo tudei ni cakacaka (SOP) me qarauni kina na ririko eso ni porokaramu ni Veivuke ni Vodovodo ni Basi ena tikite livaliva, veisautaka na itukutuku sa oti na kena gauna, ka vakavouya kina na sala ni kere tikite kei na idusidusi (guidelines).

Na Tabana ni Veiqaravi Raraba Talega me du ana kena polisi ka vakadeitaka na kena itovo tudei ni cakacaka (SOP) me baleta na porokaramu ni Veivuke ni Vodovodo ni Basi vei ira na qase kei na vakaleqai vakayago.

E vakaturi talega me dua na veiyalayalati ni Tabacakacaka ni Vuli kei na tabana tikite, ka me lesuvi na tabana ni Veiqaravi Raraba na veiyalayalati kei na tabana ni tikite me wali kina na leqa sa kune ena nodrau veiyalayalati.

Keitou vakatura talega me toroi cake na cakacaka ni Tabacakacaka ni Vuli me tauri kina mai na Tabana ni Vakacavacava (Fiji Revenue and Customs Service) na ivakadinadina ni kedrau isau na itubutubu rau kere veivuke ena vukui luvedrau. Me taura vaka talega kina na Tabana ni Veiqaravi Raraba na ivakadinadina ni nodra yabakai na kere veivuke ni qase, kei na nodra mate, mai na Valenivolavola ni Sucu, Mate kei na Vakamau (Registrar of Births, Deaths and Marriages).

Keitou vakatura talega me muria matua na lawa ni yalava ni koronivuli (zoning) baleta na Veivuke ni Vodovodo ni Basi vei ira na gonevuli.

Na Tabacakacaka ni Vuli kei na Tabana ni Veiqaravi Rararaba me vakadeitaka talega ni vakayacori taudonu na vakatutu ni porokaramu a vakatura na kena matavakadidike vakailavo (internal audit team) kei na kena matayadra (Monitoring and Evaluations team).

Kena itinitini, na Tabacakacaka kei na Tabana me dau veidutaitaka (reconcile) na nodratou itukutuku kei na nodratou na tabana ni tikite, me wali taudonu kina na leqa e kune, me kua kina na vakasabusabu. E vakaturi talega me rau taura na kena itukutuku matailalai, me vaka e lavaki vakalawa (Electronic Fare Ticketing Act 2014)

Soqoni Levu

Na porokaramu ni Veivuke ni Vodovodo ni Basi ena tikite livaliva baleti ira na gonevuli, vakaleqai vakayago kei na qase sa mai yaga vei ira na lewe levu.

Keitou sa kunea ena ivolatuktuku qo ni rawa ni toroi cake na qaravi ni porokaramu ke vakatorocaketaki ka vakavoui na polisi kei na itovo tudei ni cakacaka (SOP) ni Tabacakacaka ni Vuli kei na Tabana ni Veiqaravi Raraba. Me tiko na veiyalayalati sainitaki e virikotori kina na itavi ni tabana ni tikite kei na Tabacakcaka kei na Tabana ni matanitu e kauwai kina, me taqomaki kina na matanitu ka rawa na kena inaki. Me taurivaki na itukutuku matailalai mai na tabana ni tikite me maucokona kina na veidutaitaki ni tukutuku e yavutaki kina na saumi ilavo. Sa macala gona ni sa mai yaga na porokaramu vei ira na vukei ena kena inaki, se vo tiko me vaqaqacotaki na kena yadravi me uasivi kina.

खोज के मुखाए परिणाम तथा सुझाए

व्याप्ति

यह लेखा परीक्षा ई-टिकेटिंग के द्वारा बस के भाड़े की सहायता की शासन तथा प्रबंध स्कूल के बच्चों, बूढ़े तथा विकलांग लोगों पर तीन क्षेत्र पर निर्धारित थी , ' कार्यक्रम का शासन', कार्यक्रम का प्रदर्शन', और 'डाटा की विश्लेषण'।

खोज के मुखाए परिणाम कार्यक्रम का शासन

- शिक्षा मंत्रालय अपनी नीति को अभी भी आलोचना करने में बाकी है जिसकी सीमा 2016 में समाप्त हो गई है जब की सामाजिक कल्याण विभाग ई-परिवहन की नीति की ढांचा को तैयार नहीं कर पाई है।
- शिक्षा मंत्रालय अपने परिवहन सहायता नीति और मानक संचालन प्रक्रियाओं (SOPs) की आलोचना करने में बाकी है जिसमें ई-टिकटिंग सहायता को प्रदान करने वाले की जिम्मेदारी हो तथा उन जिम्मेदारियों की रूपरेखा दी जाए जैसे की सर्वग्राही एलेक्ट्रोनिक अधिनियम 2014 की आवश्यकता है। SOPs जो सामाजिक कल्याण विभाग ने तैयार की है उसको अभी भी स्थायी सचिव की समर्थन मिलनी बाकी है।
- शिक्षा मंत्रालय तथा ई-टिकटिंग सहायता प्रदान करने वाले के बीच में कोई आधिकारिक समझौता (सेवा स्तर समझौता) नहीं है।
- सामाजिक कल्याण विभाग तथा संहायता प्रदान करने वाले के बीच की समझौता की जांच के बाद खामी मिली जिसे सुधारने की जरूरत है।
- हालांकि शिक्षा मंत्रालय और सामाजिक कल्याण विभाग के पृथक भागों में शिकायत दर्ज की जाति है, किस प्रकार से शिकायत दर्ज करने वाले को कैसे प्रतिपुष्टि दी जाती है उस कि कोई स्पष्ट प्रणाली नहीं है।
- कार्यक्रम में काम करने वाले लोगों को अपनी व्यक्तिगत हित की घोषित करने के लिए शिक्षा मंत्रालय और सामाजिक कल्याण विभाग ने कोई भी नीति तथा प्रक्रिया को तैयार नहीं किया है।

कार्यक्रम का प्रदर्शन

- स्वीकार्य डेटा की शासन की प्रक्रिया अनुपस्थित है जहां समझौता बनाई जाती है जिस से सही जानकारी जैसे की कई की सही उपयोग की विवरण, यात्रा की प्रतिरूप तथा योग्य छात्रों की व्यवहार पर निगरानी रखी जा सके।
- शिक्षा मंत्रालय तथा सामाजिक कल्याण विभाग की रखी हुई अभिलेख तथा ई-टिकेटिंग सहायता प्रदान करने वाले के रखी हुई अभिलेख के बीच में मिलान नहीं की जाती है।
- सामाजिक कल्याण विभाग के पास ऐसी कोई भी क्रिया विधि अपने प्रक्रिया में बूढ़े तथा विकलांग लोग जो बस के भाड़े की सहायता की कार्यक्रम के प्रापक के बहार जाने से संबंध नहीं है।
- 8 अप्रैल 2020 को सामाजिक कल्याण विभाग के मोनिटरिंग तथा इवेलुआइशन टीम ने अपने कार्यक्रम की मूल्यांकन में आट सुझाए दी थी। मई 2020 तक डिपाटमेंट ने सिर्फ एक सुझाओ पर काम की थी।
- हमारी मई 2020 MEHA की भीतरी लेखा परीक्षा की समीक्षा ने छ जांच-परिणाम जो बस के भाड़े की सहायता से जुड़ी है को सामने लाई। जैसे की, बस के भाड़े की सहायता की अर्जी को स्वीकार या अस्वीकार बच्चों की रहने की जगह पर निर्धारित क्षेत्र के

अनुसार की जाती है जब की स्कूल के मुख्य अध्यापक इसकी निगरानी रखते है। TAU इस विषय पर सुझाओ को लागू कर रही है।

 छात्रों की बस के भाड़े की सहायता की आवेदन की प्रणाली में काफी ज्यादा संख्या में खामियों पाई गई जिन को परिवहन सेवा नीति को सुधारने की जरूरत है।

मूल्यांकन टीम

- ई-टिकटिंग के सहायता को प्रदान करने वाले ने विभाग से जारी की हुई ID के अलावा अन्य तरह की ID को स्वीकार किया।
- कुछ मामले में, एक सक्रिय ID पर एक से ज्यादा उपयोगकर्ता थे।
- कुछ मामले में एकज़म्प तथा कोन्सेशन कड़स पर महीने की \$40 मंजूरी से ज्यादा रकम थी।
- कुछ मामले ऐसे भी थे जहां एक ID से धन दूसरी पर गलती से दाल दी गई थी।
- शिक्षा मंत्रालय तथा टिकेटिंग सेवा देने वाले के अभिलेख के बीच में असंगति थी।

सामान्य

सुझाओ

शिक्षा मंत्रालय को हम ये सुझाओ देते है की वह अपने परिवहन सेवा नीति की समीक्षा करें जो 2016 में होनी थी तथा अपने SOPs को अपडेट करें ताकि बस के भाड़े की सहायता की कार्यक्रम से जुड़ी हुई खतरे को ठीक कर सके, ई-टिकटिंग के द्वारा, पुरानी जानकारी को बदले तथा नई टिकटिंग सेवाएं की अर्जी और नीति को जोड़ सके।

इसी तरह, सामाजिक कल्याण विभाग भी एक नीति बनाए तथा अपने SOPs को अंतिम रूप दे जो बूढ़े तथा विकलांग लोगों की बस के भाड़े की सहायता की संचालन पर शासन करें।

शिक्षा मंत्रालय को या भी सुझाओ दी जाती है की ई-टिकटिंग सेवा देने वाले के साथ एक समझौता बनाये जब की सामाजिक कल्याण विभाग अपने ई-टिकटिंग सेवा प्रदान करने वाले के साथ की समझौता की समीक्षा करें ताकि जो भी खामियाँ मिली है उसे सही कर सके।

शिक्षा मंत्रालय को हम या भी सुझाओ देते है की वह अपने प्रक्रिया को सुधारे ताकि जो बच्चे कार्यक्रम के नीचे सहायता की अर्जी लगाते है उनकी माता-पिता की आमदनी फीजी राजस्व और सीमा शुल्क सेवा से प्राप्त की जा सके। इसी तरह, सामाजिक कल्याण विभाग को चाहिए की वह जन्म, मृत्यु और विवाह रेगीस्टर के साथ व्यवस्था बनाये ताकि जो बूढ़े नागरिक अर्जी लगाते है उनकी उम्र सही समय पर मिल सके तथा साथ ही में जिनको सहायता दी जाती है उनकी मौत की भी समय पर जानकारी मिल सके।

हम ये भी सुझाओ देते है की छात्र की नीति को कड़ी तरह से लागू किया जाए बच्चों को बस के भाड़े की सहायता देते समाए।

शिक्षा मंत्रालय तथा सामाजिक कल्याण विभाग को अपने भीतरी हिसाब किताब की जांच, निगरानी, मूल्यांकन टीम के सुझाओ को समय पर लागू करने के लिए कदम उठाए जाए।

आखिरी में, शिक्षा मंत्रालय तथा सामाजिक कल्याण विभाग को नियमित तौर पर अपने

अभिलेख और ई-टिकटिंग सेवा प्रदान करने वाले के अभिलेख की मिलान को करने की जरूरत है ताकि कोई भी त्रुटि समय पर सुधारी जा सके जिससे अन-आवश्यक धन की बरबादी ना हो। यह भी सुझाओ दी जाती है की शिक्षा मंत्रालय तथा सर्वग्राही एलेक्ट्रोनिक किराया टिकट अधिनियम 2017 के नीचे विस्तृत अभिलेख को हासिल करें।

सम्पूर्ण निष्कर्ष

> बस के भाड़े की कार्यक्रम ई-टिकटिंग के द्वारा स्कूली बच्चे, विकलांग तथा बूढ़ों के लिए कई लोगों के जीवन में सकारात्मक प्रभाव लाई है। एक व्यापक अध्ययन को आयोग यह निर्धारित करने के कोशिश कर सकती है की कैसे लोगों को सहायता मिली है तथा आगे चल के कैसे इस सहायता को और मजबूत की जा सकती है। हमारे जांच पर आधारित जो इस अभिलेख में है, कार्यक्रम की वितरण दोनों शिक्षा मंत्रालय तथा सामाजिक कल्याण विभाग की नीति की ढांचा तथा sors को अपडेट करने से और सुधारी जा सकती है। हस्ताक्षर की हुई समझौता जो ई-टिकटिंग सेवा प्रदान करने वाले की तथा जुड़ी हुई सरकारी संस्थाओं की भूमिका तथा जिम्मेदारी को सही तरह से परिभाषित करें वह सरकार की हित को सुरक्षित रखेगी। ई-टिकटिंग सेवा प्रदान करने वाले से सही अभिलेख मिलने पर की हुई भुगतान की मिलान प्रणाली को और सुधार सकती है। इसलिए, जब की या कार्यक्रम लक्षित जनसंख्या के लिए लाभदायक है, और मेहनत पूरे शासन पर जरूरत है कार्यक्रम को और फलदायक बनाने के लिए।

1.0 INTRODUCTION

The 2013 Constitution of the Republic of Fiji⁴ contains the right of every person to have reasonable access to transportation. It further establishes the rights or persons with disability to have access to all places, public transport and information and the rights of every persons to early childhood education, primary and secondary education and further education.

In 2015, the Republic of Fiji adopted the 2030 Agenda for Sustainable Development that is aimed at improving people's lives economically, socially and environmentally. The 2030 Agenda for Sustainable Development is a United Nations (UN) global initiative containing 17 sustainable development goals and 169 targets. The 15 year Agenda came into effect from September 2015 following on from the expiry of the Millennium Development Goals (MDG).

In November 2017, the National Development Plan (NDP) was launched. The plan reiterates the national vision of Transforming Fiji which promotes widespread improvement in society. For example, more employment opportunities and a significant reduction in the levels of hardship, poverty and inequality.

The Bus Fare Assistance program through e-ticketing to students, elderlies and persons with disabilities is part of the governments' action towards providing access to better education and creating more opportunities for children from poor families and freedom of movement for all to reduce hardship, poverty and inequality.

⁴ Constitution of the Republic of Fiji, Section 34

PERFORMANCE AUDIT ON THE ADMINISTRATION AND MANAGEMENT OF BUS FARE ASSISTANCE THROUGH E-TICKETING FOR THE SCHOOL CHILDREN, ELDERLIES AND PERSONS WITH DISABILITY

1.1 Background

Within a period of three years from 2017 to 2019, the number of Fijian students relying on government for bus fare assistance has increased significantly.

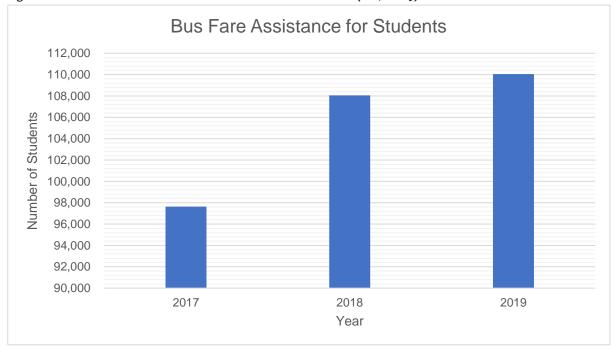


Figure 1.1: Students Provided with Bus Fare Assistance Initiative (2017-2019)

Source: Data provided by TAU

A similar trend within the same time frame was observed for the elderly citizens along with Fijians living with disability.

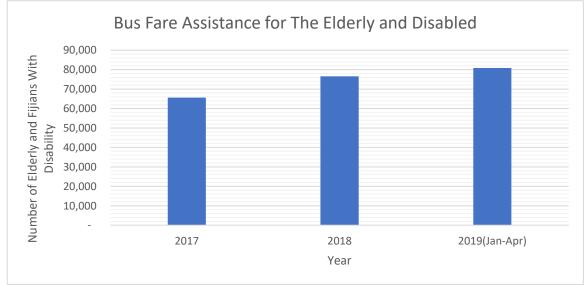


Figure 1.2: The Elderly and Fijians with Disability Supported with Bus Fare Assistance Initiative (2017-2019)

Source: Data provided by DSW

PERFORMANCE AUDIT ON THE ADMINISTRATION AND MANAGEMENT OF BUS FARE ASSISTANCE THROUGH E-TICKETING FOR THE SCHOOL CHILDREN, ELDERLIES AND PERSONS WITH DISABILITY This increased demand has placed additional pressure on resources available within government to deliver not only effectively but do so in an efficient and economical manner. Through Private Public Partnership between government's implementing agencies and the e-ticketing service provider, government was able to provide transport assistances through e-ticketing in 2017.

A total of 88,579 students received transport assistance vouchers in 2009 when it started while 80,879 elderly and disabled persons received 50% concession voucher in 2011. In 2017, bus fare assistance through e-ticketing cards was implemented and by term 3 of 2019, a total of 66,674 students and about 51,444^[1] senior citizens and people with disability received e-transport cards.

The elderly and disabled persons received full 100% assistance for their fare at the maximum value of \$40 per month in 2018. Students living in rural areas that have no bus services still use vouchers to travel on carrier, minibuses and punts. Public funds amounting to \$100m^[2] has been spent over 3 years since the assistance was delivered through the e-ticketing platform in 2017.

1.2 Reasons for the audit

Government's commitment towards certain clusters of the population is in line with government's commitment in the NDP on "Transforming Fiji" and the government's pledge of "Leaving No One Behind".⁵ This is also in line with the Sustainable Development Goals aim to end poverty, hunger and inequality, take action on climate change and the environment, improve access to health and education, build strong institutions and partnerships, and more. In Fiji, action has already begun. One such initiative is the government's bus fare assistance for the school children, elderlies and persons with disability.

Our audit has been undertaken to look into the efficiency and effectiveness of the Bus Fare assistance program provided by government which is targeted towards school children, the elderly and persons with disabilities.

^[1]https://www.fbcnews.com.fj/news/family-members-only-visiting-their-elderly-for-monetary-benefits/ ^[2] As at 25 Feb 2020 from FMIS

⁵ https://www.pacific.undp.org/content/pacific/en/home/presscenter/articles/2016/06/23/fiji-government-ngos-and-undpworkingin-partnership-to-fulfil-the-underlying-sdg-pledge-to-leave-no-one-behind-.html

PERFORMANCE AUDIT ON THE ADMINISTRATION AND MANAGEMENT OF BUS FARE ASSISTANCE THROUGH E-TICKETING FOR THE SCHOOL CHILDREN, ELDERLIES AND PERSONS WITH DISABILITY

2.0 AUDIT OBJECTIVE, SCOPE AND METHODOLOGY

2.1 The purpose of our audit

Our audit seeks to assess whether the Bus Fare Assistance program through E-Ticketing is being effectively managed, operated and monitored. Specifically, it examines whether governance and contractual arrangements including frameworks for monitoring and evaluation, ensures the efficient operation of the Bus Fare Assistance program and effectiveness in reaching the intended beneficiaries. Our audit covered the role of the Ministry of Women, Children and Poverty Alleviation and Ministry of Education, Heritage and Arts in working with the e-ticketing service provider to oversee the successful implementation of the Bus fare assistance program.

The target population covered in our audit are as follows:

- for School Children: enable students (whose combined parent's income < 16,000) gain equity and access to quality education facilities within their home zone schools⁶ (within 2km⁷ radius from the school).
- for Elderly and the disabled: empower underprivileged persons; reasonable access to transportation, food security and safe water, and social security schemes.

Sub-Objectives

The following are the sub objectives of the audit:

- To examine the adequacy of the relevant framework, legislations, policies, plans, funding and conditions upon which the initiative was established.
- To determine the operational effectiveness and efficiency of the bus fare assistance program administered by MEHA and DSW. These can be determined through the following:
 - Effectiveness of forward planning to advise the government soundly on the bus fare assistance program.
 - Effectiveness of controls to ensure the financial regularity of the bus fare assistance program.
 - Effectiveness of monitoring and reporting on the bus fare assistance program's performance against government objectives.

2.2 What we audited

This report focuses on the administration and management of the bus fare program by examining its implementation and actual operations of the units within the MEHA and DSW since November 2017.

⁶ Policy on Transport Assistance 2015

⁷ Policy on School Zoning

PERFORMANCE AUDIT ON THE ADMINISTRATION AND MANAGEMENT OF BUS FARE ASSISTANCE THROUGH E-TICKETING FOR THE SCHOOL CHILDREN, ELDERLIES AND PERSONS WITH DISABILITY

The Transport Assistance Unit (TAU) of the Ministry of Education Heritage and Arts administers the Bus Fare assistance to school children from low income earning families while the Department of Social Welfare (DSW) of the Ministry of Women, Children and Poverty Alleviation administers the bus fare assistances to the elderlies and persons with disabilities.

2.3 How we audited

Audit techniques used for gathering evidence and conducting our audit included the following:

- I. Interview of key personnel at the Ministry of Education, Heritage and Arts, Department of Social Welfare and the key responsible personnel of the e-ticketing service provider;
- II. Documentary review of legislation, policies, development plans, strategies, reports, media articles, and
- III. Analysis of data gathered, key performance indicators, measurement of outputs and performance information systems.

3.0 ADMINISTRATION OF THE PROGRAM

This section of the report examines the framework within which the Bus fare assistance program operates. The report looks at the legal framework, policies and other governance arrangements in place through which the program is being administered and whether they are effective in terms of how the Bus Fare Assistance program is being delivered.

Theme 1: Legal and Policy Framework

Audit Observation

The constitution emphasizes the importance of education, equality and inclusiveness of people living with disability as a priority for social and economic development. The National Development Plan has been developed in alignment to the Sustainable Development Goals (SDG). Government initiative to assist the poor and those receiving social benefits has been further enhanced with the provision of transport assistance.

The processing of the transport assistance has been greatly improved with the introduction of eticketing in 2017 whereby recipients are issued electronic bus cards to access the assistance as compared to the use of vouchers between 2010 and early 2017.

The Policy on Transport Assistance for the MEHA which was approved in 2015 has not been reviewed. It was developed before the introduction of the e-ticketing system and still refers to processes dealing with the issue of vouchers to students.

In addition, DSW does not have any policy on the provision of transport assistance to the elderly and people with disabilities.

Neither MEHA nor DSW conducted any risk assessment when the bus fare assistance through externally provided e-ticketing system was implemented.

Criteria

A person with any disability has the right to reasonable adaptation of buildings, infrastructure, vehicles, working arrangements, rules, practices or procedures, to enable their full participation in society. Everyone has the right to education; including (a) early childhood education; (b) primary and secondary education; and (c) further education. The state must take reasonable measures within its available resources to achieve the progressive realisation of the right—(a) to free early childhood, primary, secondary and further education; and (b) to education for persons who were unable to complete their primary and secondary education.⁸

A person with any disability has the right— (a) to reasonable access to all places, public transport and information; (b) to use sign language, braille or other appropriate means of communication; and (c) to reasonable access to necessary materials, substances and devices relating to the person's disability. (2) A person with any disability has the right to reasonable adaptation of buildings, infrastructure, vehicle, working arrangements, rules, practices or procedures, to enable

⁸ Section 31 of the 2013 Constitution of the Republic of Fiji

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their full participation in society and the effective realisation of their rights. (3) To the extent that it is necessary, a law or an administrative action taken under a law may limit, or may authorise the limitation of, the rights set out in this section.⁹

A policy is a formal statement of a principle that should be followed in an organisation. It is a written declaration of policy decisions which sets the direction or strategy for how the organisation should approach and address something.

Risk Management is the systematic application of management policies, procedures and practices to the task of identifying, analysing, assessing, treating and monitoring risk. It is not just about identifying risks, it is about learning to understand and weighing the level of risk or the criticality of the risk. Criticality is obtained by combining the likelihood of being exposed to a risk and the consequences of the risk. All section/unit heads shall be responsible for incorporating risk management into their standard management practices by identifying and determining appropriate actions to address operational and business continuity risks within their jurisdictions in accordance with MEHA policies and procedures. The MEHA shall recognise that risk management is an integral function of an effective service delivery and is not an isolated activity. All section/unit heads shall demonstrate a high level of awareness, acceptance and support risk management.¹⁰

Evidence and its Analysis

Cabinet in its special meeting held on 13th December 2009, approved the Ministry of Education's submission on the proposed Implementation Strategy of the Transport Assistance to Students.¹¹ Cabinet agreed on the following:

- (i) the criteria for eligibility to the transport assistance for students in 2010 as proposed under section 4.0 (A,B and C) of the memorandum; and
- (ii) the implementation strategy as proposed in section 5.0 and 6.0 of the memorandum.

Since the implementation of the Transport Assistance program in 2009, vouchers and coupons were the medium used to disburse the assistance when students board school buses, RSL carriers as well as the use of punts for school trips.

In 2017, government initiated and implemented a more robust and innovative means of disbursing the bus fare assistance through the electronic bus fare ticketing system. This was enabled though the Electronic Fare Ticketing Act 2014.

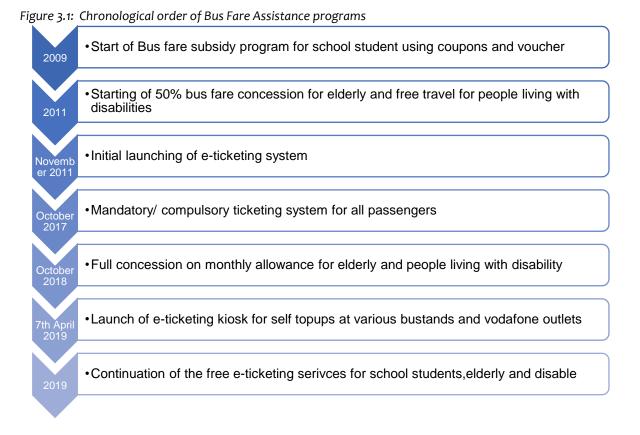
The Act requires the use of e-ticketing cards by all commuters which is to be swiped in all buses through e-ticketing machines. Electronic ticketing is limited to bus services only within areas that catches the telephone networks, students using RSL carriers and punt are still using vouchers and coupons till to date. Refer to the graph below for the chronological order of the bus fare assistance program.

⁹ Section 42 of the 2013 Constitution of the Republic of Fiji

¹⁰ http://www.education.gov.fj/wp-content/uploads/2019/04/Risk-Management-Policy-2015-Final.pdf

¹¹ Cabinet Paper CP (09) 334 of 13 December 2009

PERFORMANCE AUDIT ON THE ADMINISTRATION AND MANAGEMENT OF BUS FARE ASSISTANCE THROUGH E-TICKETING FOR THE SCHOOL CHILDREN, ELDERLIES AND PERSONS WITH DISABILITY



In 2017, government enacted the Omnibus Electronic Fare Ticketing (Budget Amendment) Act 2017 which makes reference to the Electronic Fare Ticketing Act 2014 as the principal Act. The principal Act regulates the use of electronic cards by all citizens including subsidized students, nonsubsidized students, senior citizens and people living with disability.

The government's plan and actions are aligned and implemented in accordance to the Sustainable Development Goals; Goal 1 to reduce poverty, Goal 4 to provide quality education for all and Goal 10 to eliminate inequality.

Part 3.1.5 of the NDP emphasises on the theme Quality Education for all. Quality education for all is essential to create a more skilled and adaptable workforce and create a knowledge based society. Further discussions state that with the free-education initiative, free bus fares and free textbooks, enrolment numbers have increased significantly. More teachers have been recruited, and continuous hiring of quality teachers will continue to improve the teacher to- student ratio for rural and urban areas.¹⁴

Under the NDP Goals and Policies, Goal Number 2 emphasises on ensuring every Fijian student has equal access to education at all levels including the provision of assistance towards students bus fare. The extract below from the NDP includes strategies such as continuation of free education initiatives and bus fare subsidy.

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Policies	Strategies
Ensure every Fijian Student has equal access to education at all levels.	Continuation of free education initiative, bus fare subsidy, free textbooks, toppers scholarships and tertiary loan scheme.
	 Improve infrastructure, facilities and learning materials for all schools. Timely provision of textbooks and building grants to schools. Provision of access for the physically challenged students. Updating of the Fiji Education Management Information System (FEMIS) to cover all aspects of school information. Development of an e-library or virtual library for all citizens.

Table 3.1: National Development Plan Policy and Strategies on Equal access to Education

Source: Fiji NDP12

The NDP has annual targets and total expected output projected to be achieved under the bus fare assistance program over a 5 year plan.

This also includes annual targets for number of students to be assisted. In the NDP extract below, it was targeted to provide transport assistance to 88,579 students in 2017-2018 period and thereafter 90,000 students each year.

Programme	Annual Targets				Total Output Expected	Lead Agency	
	2017 - 2018	2018 - 2019	2019 - 2020	2020 - 2021	2021 - 2022		
Quality Educatio	n						
Free bus fare scheme (No. of students assisted)	88,579	90,000	90,000	90,000	90,000	448,579	MEHA

Table 3.2: National Development Plan annual targets and total expected projected output

Source: Fiji NDP13

Under part 3.1.7 of the NDP on Social inclusion and empowerment, the policy statement requires the promotion of a caring environment where everyone is safe and protected and its strategies include implementation, monitoring and review of legislations relating to the principles on the Convention on Rights of Older Persons and Convention on Rights of Persons with Disability and

¹² 5 year and 20 year National Development Plan Theme 3.1.5_Education_"Quality Education for all", Pg 36.

¹³ 5 year and 20 year National Development Plan Theme 3.1.5_Education_"Quality Education for all", Pg 37.

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other relevant international instruments. The table below is an extract from the NDP Part 3.1.7 on Social Inclusion and Empowerment.

Table 3.3: Policy based on a Socially Inclusive Fiji

Goal: A socially inclusive Fiji and empowered Fijians.		
Policy	Strategies	
Promote a caring environment where everyone is safe and protected.	 Strengthen data gathering for baseline studies and analyses of the needs of children, elderly, people with disabilities and assessments of poverty. 	
	 Review state social protection systems for the protection and care of vulnerable groups. 	
	 Review and, if needed, enhance education, employment, trade, fiscal and other government policies as they impact vulnerable groups and social empowerment programs. 	
	 Implement, monitor and review legislation relating to the principles and provisions of the Convention on the Rights of the Child, Convention on the Rights of Older Persons, Convention on the Rights of Persons with Disability and other relevant international instruments. 	
	Encourage in-family support for the elderly.	

Under the NDP's Social Inclusion and empowerment program, the following were discussed for the next 5 years commencing from 2017:

- Government will ensure that every Fijian is provided with the basic amenities of life.
- Social inclusion programs such as the poverty benefit scheme, welfare graduation programme and social pension scheme will be maintained.
- Targeted assistance will be provided to the vulnerable, including children living in poverty, children in orphanages and foster care, people with disabilities and special needs, and the elderly.¹⁴

A Risk Management Policy was approved in January 2015 by the Minister for Education to provide procedures and guidelines to all sections of the Ministry with a standard process to identify, analyse, evaluate, mitigate and monitor the key strategic and operational risks impacting on the MEHA's vision. The aim is to manage the risks involved in order to maximise opportunities and minimise negative outcomes.

With the delivery of the bus fare assistance to eligible students now transferred from the manual ticketing system onto the e- transport platform in 2017; the operating environment and risks have also changed not only at certain risks points within the Ministry/Department but also an entirely new basket of risks externally with the engagement and interaction of systems and procedures practised by the external e-ticketing service provider.

Discussions with the MEHA on 13 March 2020 revealed that the e-ticketing service provider had refined and revised its procedures when deficiencies in reporting were observed during the audit conduct phase in February 2020 for the last school term of 2017, school terms in 2018 and first two

¹⁴ 5 year and 20 year National Development Plan _3.1.7_Social Inclusion and Empowerment Paragraph 3_Pg 49

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terms of the year 2019. By the last term of 2019, the e-ticketing service provider was able to provide an increased level of detailed reports when compared against those facilitated for preceding terms.

The Ministry of Education, Heritage and Arts also developed and implemented the Policy on Transport Assistance in 2015, which plays the dual role of systematic policy guidelines and standard operating procedures for the management of the student bus fare assistance program. The various role of the officers involved in processing bus fare assistance are described in the policy, which include the role of school heads, transport assistance officers and the MEHA.

The Policy on Transport Assistance has a review timeline of one year. The first review which was due on 20th January 2016, has not been carried out. The policy therefore has not been updated although it is still being used by the Ministry for the management of bus fare assistance. Audit noted the following components which indicate that the policy needs to be updated:

- The policy still recognises students whose parents earn below \$15,600 as eligible students for bus fare assistance while new amendments in the bus fare assistance application has raised the threshold to \$16,000.
- The policy is predominantly voucher and coupon driven, it recognises them as primary transaction modes instead of the e-ticketing platform, hence deliberations based on e-ticketing platform was lacking.
- The policy does not make provision for the proof of assessment made by the Transport Assistance Officer (TAO) to sign on the student bus fare applications after completing their assessment.

The audit noted that MEHA has not carried out any verification or independent confirmation of income declared by parents.

On the other hand, the Department of Social Welfare is yet to develop and implement a specific policy framework to guide the Bus fare Assistance program for the elderly and disabled. The department is using a draft standard operating procedure to guide the overall processing of applications, responsibilities of departmental staffs and the approving authorities.

Causes

The audit noted that the bus fare assistance program through e-ticketing was expeditiously implemented without proper planning and no proper assessments were done at the Ministry level. Therefore, the two units within MEHA and DSW that is responsible for the management of the bus fare assistance program through e-ticketing had a lot of work to do in implementing the program as the current practices were yet to be incorporated into the existing policy which facilitated the use of coupons and bus fare vouchers.

Risk assessment within the MEHA in particular by the Transport Assistance Unit was not undertaken to capture subsequent changes in the actual operations of the bus fare assistance. The change occurred when the delivery of the assistance was transferred from manual system to the e transport platform provided by the e-ticketing service provider.

The Policy on Transport Assistance was approved by the Minister for Education in January 2015 while the review date for the policy was 20th January 2016. The Policy on Transport Assistance was

not reviewed nor was any risk assessment carried out to determine the risks associated with the provision of e-ticketing services by an external service provider.

Delay in review of the Policy on Transport Assistance to amend and update it with current changes was attributed to the absence of formulated review schedules by the MEHA management. Similarly, the absence of a policy framework at Department of Social Welfare is an oversight of the Department's management whereas the draft SOP was designed to cover dual roles as a policy guideline and standard operating procedure.

Effect

The delay in review of the MEHA's Policy on Transport Assistance has adversely affected the smooth operation and management of the Bus Fare Assistance program as the policy still refers to the use of coupons and bus fare vouchers instead of e-transport cards. The two processes are quite different and e-ticketing systems is more complex as it also involves the engagement of an external e-service provider. The updated policy guidelines and procedure which is relevant and necessary to guide the operation is missing. On the same note there is absence of policy guideline to guide the Department of Social Welfare's operations, that outlines specific policy measures and cover areas of authority.

Given the lack of guidance and procedures to deal with the new e-ticketing system, both agencies did not carry out any checks on the operations of the external e-ticketing service provider. Reconciliations on the use of grants by recipients were also not carried out.

Good Practices

MEHA has commenced review of the Policy on Transport Assistance and were consulting their concerned stakeholders. The Ministry was targeting July 2020 for its approval and implementation. DSW has also committed to developing their policy which could be used as guidance for other assistance they provide.

Expected Benefit

A review of the TAU policy framework will ensure that relevant and appropriate guidelines are developed that supports the management and operation of the student's bus fare assistance program. Similarly, development of Department of Social Welfares' policy framework will ensure that policy measures, processes and procedures of the Department's bus fare assistance is properly governed in line with the government's objectives. Furthermore, the updating and review of the risk assessment for the TAU and DSW will enable them to identify gaps such as lack of guidelines and procedures and devise mitigation plans.

Recommendations

- The Ministry of Education, Heritage and Arts should review the policy framework for the program and align it to e-ticketing mode which is currently being used.
- The Ministry of Education and the Department of Social Welfare should update their risk assessment to incorporate risks associated with bus fare assistance through e-ticketing.

• The Department of Social Welfare should develop a policy framework that covers specific policy measures in relation to bus fare assistance provided to elderly and persons with disabilities and cover areas of authority not necessarily covered by the SOP

Theme 2: Standard Operating Procedure

Audit Observation

Standard Operating Procedures (SOPs) for bus fare assistance in the Ministry of Education and the Department of Social Welfare should be updated to prevent, detect and rectify unusual events that indicate unwarranted practices from the users of the assistance. In the case of Ministry of Education, there is no separate SOP. However, processes and procedures are incorporated within the Policy on Transport Assistance which is yet to be updated. The Department of Social Welfare has drafted a SOP but there is no clear indications as to when it would be finalized.

Criteria

A procedure provides detailed mandatory steps (sometimes in the form of a checklist) which can be followed to achieve a recurring task or comply with a policy. These can include step-by-step instructions or statements stating what needs to be done. A procedure informs employees how to carry out or implement a policy. Procedures usually contain written instructions in logical numbered steps and are also commonly known as SOPs in the public sector.

A solution provider must provide the:

- a) Ministry of Education with access to the data, including the reports generated from the data, on subsidized students; and
- b) Department of Social Welfare with access to the data, including the reports generated from the data, on subsidized senior citizens or persons with disabilities.¹⁵

Subject to subsections (1), (2) and (3), solution providers must ensure that the data and reports:

- a) are accessed by authorised persons of the various organisations and that secure logins are provided for the access of such information; and
- b) include, but are not limited to the following
 - i. all classes of passenger details;
 - ii. all classes of passenger travel details and bus card usage;
 - iii. revenue and loading reports;
 - iv. loading statistics and reports;
 - v. top up reports on all passengers;
 - vi. omnibus registration number and identification reports;
 - vii. blacklist and bus card status reports;
 - viii. reports of bus cards readers;

¹⁵ Electronic Fare Ticketing Act 2014, Section 19(3)

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ix. such other information as may be prescribed by Regulations.¹⁶

Evidence and its Analysis

The Ministry of Education does not have a specific SOP for student bus fare assistance program. However, the Policy on Transport Assistance is used for its standard operating procedures. The policy was prepared to play a dual role as a policy guideline while also detailing procedures for the management and operation of the bus fare assistance program. Review of the Policy noted that it only deals with internal stakeholders and does not cover the role of the external stakeholder which is the e-ticketing services provider. This has led to the absence of reporting between the Ministry and the e-ticketing service provider as required under the Electronic Fare Ticketing Act 2014. This has resulted in differences between the records of the Ministry and the e-ticketing service provider as proper reconciliations were not done.

Review of the draft Standard Operating Procedures for the Department of Social Welfare indicated that the draft is yet to be finalised and endorsed.

Although the Electronic Fare Ticketing Act 2014 enables the Ministry/Department to request for other reports in addition to those provided by the e-ticketing service provider, these provisions have not been applied.¹⁷

Causes

A specific SOP for student's bus fare assistance program was not prepared as the Policy on Transport Assistance includes detailed standard operating procedures that the Ministry is referring to for the management of the program. Furthermore, the management of the Department of Social Welfare has not endorsed the draft SOP for bus fare assistance.

Effect

The non-revision of SOP/TAU policy to include external stakeholders have resulted in nonfulfilment of obligatory engagement with the e-ticketing service provider to provide exception reports and issues pertaining to management of student bus fare assistance program. On the same note the non-endorsement of the Department of Social Welfare's SOP increases the risks of noncompliance that can hold the Department accountable for any mismanagement in providing social welfare services.

Good Practices

The Ministry of Education had informed audit that a review was currently being undertaken for the Policy on Transport Assistance and the Ministry was in the process of consulting with stakeholders. The Ministry also mentioned that it has drafted its Standard Operating Procedures for transport assistance. The revised Standard Operating Procedure will include requesting the e-ticketing service provider to provide detailed reports for each month including exception reports as requested by MEHA. The Ministry is targeting the end of July 2020 for the policies to be approved

¹⁶ Electronic Fare Ticketing Act 2014, Section 19(4)

¹⁷ Electronic Fare Ticketing Act 2014, Section 19 sub section 3 - 4

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and implemented. ¹⁸ A copy of the draft Policy on Transport Assistance and draft Standard Operation Procedures was provided to audit.¹⁹

Expected Benefit

Having policies and procedures that are up-to-date and aligned to applicable legislation would ensure consistency in application and remove any confusion or bias. This will assist the Ministry of Education and Department of Social Welfare in educating the target recipients of the assistance and expectations from other stakeholders including the e-ticketing service provider.

Recommendations:

- The Ministry of Education should review the Policy on Transport Assistance to include, amongst other things, the e-ticketing service provider as external stakeholder.
- The Department of Social Welfare should ensure that approval of the Standard Operating Procedures is obtained as soon as possible and to include analysis and evaluation of eticketing data

Theme 3: Service Agreement between Ministry of Education Heritage and Arts and E-Ticketing Service Provider for Students fare

Audit Observation

Contract agreement plays an important role because it is useful in assigning the terms and conditions of services which is to be provided by the contracted party. It was noted during our audit that since the start of the program, the Ministry of Education, Heritage and Arts (MEHA) still does not have any agreement with the external e-ticketing service provider for the bus fare assistance scheme for eligible school students.

Criteria

A written contract or agreement must be entered into with the approved bidder for the supply of the goods, services or works tendered. Legal advice must be sought on the draft contract or agreement.²⁰

Evidence and its Analysis

After enquiring with the TAU of Ministry of Education, Heritage and Arts, it was revealed that no formal agreement exists between the Ministry and the e-ticketing service provider for the delivery of the Bus Fare Assistance Program to eligible students. During the last quarter of 2017 calendar

¹⁸ Ministry's unsigned comments e-mailed to audit on 12/05/20

¹⁹ Provided via e-mail on 19/05/20

²⁰ "Consideration and Evaluation of Tenders", Ministry of Education Finance Manual 2017, Pg 8.

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year, the e-ticketing card system was expeditiously implemented. The policy on bus fare assistance for school students was also not amended to cater for the change in method of providing the assistance from coupon and vouchers to e-ticketing cards. Similarly, internal control mechanisms for the new e-ticketing system was not developed. The Ministry continued to place total reliance on the system of the external e-ticketing service provider to distribute the assistance to beneficiaries.

Causes

Limited consultation and poor project management can be attributed for the oversight of failing to sign agreements with vendors especially for the IT related matters.

Effects

The absence of an agreement between the Ministry of Education Heritage and Arts and the eticketing service provider will make it difficult to create, identify, outline and agree on roles and responsibilities of the two parties. When these have not been clearly done, unrealistic expectations and misunderstandings can arise.

Good Practices

The Ministry of Education informed audit that they were in the process of drafting an agreement from the point of view of the Ministry and would consult their stakeholders with the e-ticketing service provider being the main stakeholder. We were also informed that the responsibilities of both the e-ticketing service provider and the Ministry will be clearly outlined in the agreement which will be aligned to the revised Policy on Transport Assistance and the Standard Operating Procedures²¹ Audit was provided with a draft copy of the revised Policy on Transport Assistance, draft Standard Operating Procedures and the draft Memorandum of Understanding between the Ministry and the e-ticketing service provider at the time of the audit.²²

Expected Benefits

The benefits of having an agreement are as follows:

- Provides effective communication and good record keeping.
- Serves as a guide for duties to be performed by concerned parties. It will provide a clear understanding of what is expected from each other.
- > Clearly demarcates line of duties and terms and conditions between the two parties.

Recommendations

The Ministry of Education should enter into an agreement with the e-ticketing service provider to safeguard the interest of government and users of the bus fare assistance.

²¹ Ministry's unsigned comments e-mailed to audit on 12/05/20

²² Provided via e-mail on 19/05/20

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Theme 4: E-ticketing Agreement for the Department of Social Welfare

Audit Observation

The contract agreement that was signed does not contain the date on which it was signed even though the Department of Social Welfare entered into an agreement with the e-ticketing service provider for the bus fare assistance program for the elderlies and persons living with disability. The agreement is yet to be renewed for extension after expiry in October 2019. The agreement plays an important role because it is useful in assigning the terms and conditions of services which is to be provided by the contracted party. The agreement also provides other details such as duration of the contract, the services which is to be rendered and other relevant factors.

Criteria

A written contract or agreement must be entered into with the approved bidder for the supply of the goods, services or works tendered. Legal advice must be sought on the draft contract or agreement.²³

Clause 2 of the agreement read as follows:

- 2. TERM
 - 2.1 Initial Term
 - The initial term of this agreement commences on the Commencement Date²⁴ and continues for an initial term of 12 months ('Initial Month')
 - 2.2 Extension of Initial Contract

The Government may extend the Term:

- (a) untilOctober 2018 by giving written notice to the Supplier at any time before the end of the initial Term; or
- (b) to such other date as agreed between the parties²⁵

In the Bus fare Assistance e-Ticketing agreement, the supplier agrees that the supplier will send automated senior citizen and persons with disabilities card usage reports on a particular day of the month (as nominated by the Government).²⁶

Evidence and its Analysis

It is commendable that as part of its socially responsible goals, the e-ticketing service provider has been providing the e-ticketing platform to carry out its duty to facilitate movement for senior citizens and persons living with disability.

²³"Consideration and Evaluation of Tenders", Ministry of Education Finance Manual 2017, Pg 8.

²⁴ Commencement Date as October 2018

 ²⁵ Agreement between the Ministry of Women, Children and Poverty Alleviation and E-ticketing service provider, Section 2 (2.2)
 (a) and (b)

²⁶ Agreement between the Ministry of Women, Children and Poverty Alleviation and E-ticketing service provider, Section 2 (3.1) (d)

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The Permanent Secretary for Women, Children and Poverty Alleviation signed the agreement with the Chief Operating Officer and the Company Secretary of the external e-ticketing service provider to enable the provision of bus fare assistance through e-ticketing to the elderlies and persons with disabilities.

Review of the agreement noted that it does not specify the date on which the agreement was signed by the two parties. Instead the agreement specified the commencement month as October 2018 for a period of 12 months with no date clearly identified. As at the date of the audit²⁷, it was noted that the agreement has not been renewed after expiring in October 2019.

Even though the contract has provision in clause 3.1 for the Ministry to request and be provided reports in the manner it requires for its monitoring and evaluations, the Ministry has not submitted its request on reports for monitoring and evaluations each month.

Causes

Having monitoring and evaluation function in a system is an important component of good governance and it assists in improving the system. Incomplete and ambiguous agreements poses a high risk that conditions within the agreements would not be fully complied with.

The agreement in relation to DSW was not properly checked by the signatories as the commencement and end date for the contract was not clearly stated.

Effects

Not having a specific date under the signature will make it difficult to determine the exact date the agreement became effective ("effective date"). The absence of a particular date on the commencement date section will make it difficult to identify when the obligations of the e-ticketing service provider commences. Not extending the contract in writing can end up creating misunderstanding between the parties as resources dedicated from either parties to the program can change over a certain period of time.

Provision of services without an agreement is risky as there is no binding agreement for the service provider to continue with the provision of the service.

Good Practice

The DSW has commenced the review of the agreement and is using the audit findings to improve its management of the system. Acceptance of the audit finding by the DSW management is a positive step towards improving the administration and management of the Bus Fare Assistance program.

²⁷ As at 21 November 2019

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Expected Benefit

Including critical dates in agreements can assist the Ministry to better manage the services provided. Obtaining reports every month will strengthen monitoring and evaluation of the program and also reduce risks of fraud and misappropriation.

Recommendations

- DSW should review the agreement to ensure that any gaps noted in the agreement are addressed, vetted for legal compliance and renewed.
- Monthly reports should be obtained for monitoring and evaluation.

Theme 5: Management of Feedback and Complaints

Audit Observation

Both the MEHA and DSW keep records of complaints from the general public including comments received in relation to any issues they experienced or observed. However, there is no documented procedure on the manner the complaints would be managed by the two agencies and response provided to the complainant on any actions taken.

Criteria

The immediate priority is to ensure effective, efficient and accountable delivery of Ministry and Department outputs, i.e. the delivery of public services and implementation of public programmes and projects under the 5-year and 20 year National Development Plan and measuring national development targets, which are aligned to regional and international indicators like the SDGs.²⁸

The objective of bus fare concession cards is to assist senior citizens and disabled persons in their travel when using bus as their mode of transport.²⁹ Government is committed to providing an accountable and transparent service as such all the social welfare clients have the right to enquire about their cases.³⁰

Therefore, in the execution of our service delivery, whether through telephones, e-mails, fax, letters, minutes, and or face to face, MEHA officers shall strive to offer excellent customer services that are friendly, efficient and accurate at all times.³¹ During 2019 and 2020, MEHA will establish School Support Hubs and District School Support Centres. These will focus on improving support services to schools, rather than having administrative and control function.³² MEHA provides the structures, human resources, budgets, and administrative and management support to ensure that the quality of service delivery is maintained at a high level.

³⁰ Minister's Statement 2012- https://www.fiji.gov.fj/Media-Centre/News/MINISTRY-COMMITS-TO-EFFICIENTSERVICEDELIVERY

²⁸ 5 year and 20 year National Development Plan, Section 4.0, Page 134

²⁹ Objective of Busfare/Taxi Fare Concession Cards- http://www.mwcpa.gov.fj/index.php/social-welfare/otherassistance.html

³¹ Customer Service Policy 2013 Policy Objective 1

³² MEHA Strategic Plan 2019-2023

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Evidence and its Analysis

Although complaints are recorded by the Units within MEHA and DSW, there is no procedure on how to deal with the complainant up to providing feedback to complainants.

Although the policy³³ has dedicated two paragraphs on complaints, outline of the procedures on how to process each complaint has not been documented. Therefore, it is not clear as to what role each player plays from head of schools to District Education Officer before moving the issue through the TAU Unit. There is no feedback or survey done to assess how the Unit had performed with respect to handing complaints from its users.

DSW maintains a book for recording of any issues or complaints with respect to any feature of the program that the general public wishes to raise. However, there was no evidence to indicate that actions were taken on the compliant and feedback was provided to the complainants. We were also not able to determine if any survey was carried out to determine the efficiency and effectiveness of the complaints system. DSW also indicated that most complaints are made through telephone calls or they show up at their office.

Causes

Proper care in handling complaints and feedbacks from the point of receiving, recording through to resolving them has not been exercised by either Units in the two Ministries.

Lack of documented procedures or SOPs to deal with complaints is an indication on the priority of customer care and service in both agencies.

Another contributing factor highlighted by the DSW is absence of an IT system which can automate its critical processes in order to improve service delivery. Apart from the accounting function, all processing in DSW is carried out manually. No budget has been provided for the acquisition of a computerised system.

Effects

Customer satisfaction can diminish if their concerns are not handled properly and timely feedback is not provided. There is a high possibility that critical operational matters affecting customers are not identified and rectified.

Good Practices

The MEHA informed the audit that there is a section in the revised draft Policy on Transport Assistance titled "Complaints on Transport Assistance" which incorporates the engagement of customers and outlines details relating to handling of complaints and providing feedback to improve services. This was to be aligned to the draft Standard Operating Procedures.³⁴ The revised draft Policy on Transport Assistance and draft Standard Operating Procedures was provided to audit.³⁵

³³ Policy on Transport Assistance

³⁴ Ministry's draft comments e-mailed to audit on 12/05/20

³⁵ Provided via e-mail on 19/05/20

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Expected Benefit

An effective feedback system helps to identify opportunities for valuable engagement by providing means to allow their users to create insights and facilitate views from sources outside of the two Ministries. At the same time helps civil servants better understand the needs of students, senior citizens and people with disability.

A computerised data base will greatly improve automation of the many manual processes currently done which would also greatly enhance and improve the services provided by MEHA and DSW.

Recommendations

- MEHA and DSW should improve their engagement with customers in handling of complaints and providing timely feedbacks at the same time addressing any operational issues identified through the complaints.
- MEHA and DSW should consider automating its complaint management system and other critical operations which are carried out manually.

Theme 6: Conflict of Interests

Audit Observation

The audit did not find any documentary evidence to confirm that officers of both MEHA and DSW that are engaged in the delivery of the program had declared any conflict of interest that may exist or which can compromise the public service values and their roles and responsibilities when providing services to the targeted beneficiaries.

Criteria

The values and principles of State Service include:

- a. high standards of professionalism, including professional ethics and integrity;
- b. being free from corruption;
- c. efficient, effective and economic use of public resources;
- d. prompt response to requests and questions from the public, and delivery of service to the public, in a manner that is respectful, effective, impartial, fair, and equitable;
- e. accountability for administrative conduct; ³⁶

Evidence and its Analysis

Upholding integrity and values in public service is crucial. Especially for staffs of both the MEHA and DSW as they are officials serving the public, the vulnerable and weak. Dealing with government assistance also has risks such as fraud which needs to be carefully managed and mitigated.

³⁶ Constitution of the Republic of Fiji Section 123

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Discussions with the system analyst in DSW revealed that the Officers have not signed any declaration of conflict of interest. This ethical element is captured, transferred to each of its officer and acknowledged when he or she signs his or her contract. Similarly, the teachers in schools have not signed any forms to declare any conflicts of interest that may arise when assessing application for assistance that comes from the students.

Documentation of policies and procedures on values and conflict of interests are important in order for positive actions to take place. The Permanent Secretary for Women, Children and Poverty Alleviation expressed similar sentiments and noted this as one of her initial observations upon assuming office. She also emphasised the need to undertake awareness on conflict of interest in the Ministry to promote an efficient implementation and understanding from all officers.

Causes

Lack of awareness and understanding on the need to document policies and procedures for values and conflict of interests and actions taken for it is the main stumbling block in upholding integrity and values in public service. Lack of awareness and understanding of values and conflict of interests can be strengthened through training and workshops organised for staff to freely discuss and be able to fully identify actual and potential conflicts and how to mitigate them.

There have been no refresher training to the TAU at the start of this program. Whilst the contract renewal is reviewed at a minimum of three years, not having an annual declaration for conflict of interest signed by staffs will not help in maintaining the level of values expected in public service.

Effects

Absence of policies and procedures or guidance on values and conflict of interests within MEHA and DSW can lead to conflict of interest not being promptly detected and mitigated. These may also lead to increase in cases of favouritism, nepotism and fraud. Some examples of such incidents are discussed below.

Officers assessing an application can manipulate the form if he or she knows (not excluding obtaining incentives) the applicants to ensure that it is processed first from those that have been submitted earlier. In addition, processing officers who are known to the relatives or friends of an applicant that does not qualify for the assistance can get their applications approved. This means that the assistance is left open to misuse from students whose parents earn more than the maximum level of combined annual income.

Failure to recognise conflict of interest can give the impression that the Ministry/ Department is not being prudent and could potentially lead to decisions being subjective which can be challenged by applicants. This can damage reputation and undermine public confidence in the MEHA and DSW.

Good Practices

The Ministry of Education has included conflict of interest in the revised draft Policy on Transport Assistance under a section on "Fraud and corruption in relation to Transport Assistance" which requires that all officers involved in the application and processing of Transport Assistance to sign a Conflict of Interest declaration.³⁷ A copy of the revised draft Policy on Transport Assistance and draft Standard Operating Procedures was provided to audit³⁸

Expected Benefits

Implementation of the policies, procedures and/or guidelines on values and conflict of interest can assist in greatly improving the integrity and reputation of the MEHA and DSW.

Recommendation

It is recommended that policy and process for declaration of conflict of interest and values should be developed and implemented by the MEHA and DSW in their respective processes.

³⁷ Ministry's unsigned comments e-mailed to audit on 12/05/20

³⁸ Provided via e-mail on 19/05/20

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4.0 MANAGEMENT OF THE PERFORMANCE OF THE PROGRAM

This part of the report focuses on the actual delivery of the program through the efforts and actual work carried out by the respective Units within the MEHA and DSW. Accordingly, issues discussed forthwith are identified with how the assistance have been delivered.

Theme 1: Reports from the E-Ticketing Service Provider

Audit Observation

Reports provided by both the MEHA and DSW from the e-ticketing service provider for our review was not of the desired quality (including various formats) of reports as required under Section 19 of the Electronic Fare Ticketing Act 2014. It was noted that MEHA has not received any exception reports from the e-ticketing service provider to be included as part of the 23 monthly reports since the bus fare program was transferred over to the e-transport platform in October 2017. Similar observation was also noted for the Department of Social Welfare where monthly reports provided for senior citizens and people with disability only stated the amount loaded into each card for each month.

Criteria

A solution provider must provide the:

- a. Ministry of Education with access to the data, including the reports generated from the data, on subsidised students; and
- b. Department of Social Welfare with access to the data, including the reports generated from the data, on subsidised senior citizens or persons with disabilities.³⁹

Subject to Section 19, subsections (1), (2) and (3) solution providers must ensure that the data and reports:

- a. are accessed by authorised persons of the various organisations and that secure logins are provided for the access of such information; and
- b. include, but are not limited to the following
 - i. all classes of passenger details;
 - ii. all classes of passenger travel details and bus card usage;
 - iii. revenue and loading reports;
 - iv. loading statistics and reports;
 - v. top up reports on all passengers;
 - vi. omnibus registration number and identification reports;
 - vii. blacklist and bus card status reports;
 - viii. reports of bus card readers;

³⁹ Electronic Fare Ticketing Act 2014, Section 19(4

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ix. such other information as may be prescribed by Regulations.⁴⁰

Under Output 1 of the Annual Corporate Plan for 2017-2018, the Ministry of Education had identified monthly reports on students receiving bus fare assistance as one of its sub output.

The contract agreement provides the following clauses which states the obligation of the eticketing service provider:

- ✓ properly advise its officers, employees, agents and contractors regarding the requirements for transactions utilising the senior citizens and persons with disabilities fare subsidies and ensure that these requirements are followed;⁴¹
- exercise all reasonable care and skill in the performance of its obligations under this agreement and comply with all relevant laws and regulations in the conduct of its business;⁴²
- notify the Government immediately of any malfunction or discrepancies in the use of the senior citizen and persons with disabilities fare subsidy services or any suspicious transaction activity ⁴³

Data Governance is the exercise of decision making and authority for data-related matters. It is a system of decision rights and accountabilities for information related processed, executed according to agree upon models which describes who can take what actions with what information and under what circumstances using what methods.⁴⁴

Evidence and its Analysis

Review of reports received by TAU on 11 December 2019 revealed that the e-ticketing service provider did not provide any exception reports on the actual use of blue student cards to indicate travel behaviour patterns and of each eligible student. MEHA also did not request for any such report. Table 4.1 provides the types of reports generated for each month since November 2017.

Month	MEHA	Dept. of Social Welfare	Month	MEHA	Dept. of Social Welfare
Nov-17	No	No			
Jan-18	No	No	Jan-19	No	No
Feb-18	No	No	Feb-19	No	No
Mar-18	No	No	Mar-19	No	No
Apr-18	No	No	Apr-19	No	No
May-18	No	No	May-19	No	No
Jun-18	No	No	Jun-19	No	No

Table 4.1: Monthly reports provided to MEHA and DSW by the E-Ticketing Service Provider

⁴⁰ Electronic Fare Ticketing Act 2014, Section 19(3)

⁴¹Agreement between the MWCPA and the e-ticketing service provider, Section 4 (4.1) (a)

⁴² Agreement between the MWCPA and e-ticketing service provider, Section 4 (4.1) (c))

⁴³ Agreement between the MWCPA and e-ticketing service provider, Section 4 (4.1)(f)

⁴⁴ https://profisee.com/data-governance-what-why-how-who/#a11

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Month	MEHA	Dept. of Social Welfare	Month	MEHA	Dept. of Social Welfare
Jul-18	No	No	Jul-19	No	No
Aug-18	No	No	Aug-19	No	Amount loaded for each card
Sep-18	No	No	Sep-19	No	Amount loaded for each card
Oct-18	No	No	Oct-19	No	Amount loaded for each card
Nov-18	No	No	Nov-19	No	Amount loaded for each card

Review of reports provided by DSW indicated that only the amount loaded into each card for that particular month was shown. The report did not indicate the amount used; the amount redeemed and the balance available for each card throughout the 23 months since the commencement of the e-ticketing mode of assistance.

Causes

There has been no clear guidelines on the types of reports to be provided by the e-ticketing service provider to MEHA and DSW since the program delivery was transferred to the e-transport platform in October 2017. Furthermore, the MEHA did not develop Standard Operating Procedures to guide the Unit when working with reports provided by the e-ticketing service provider.

As a result of reports not being provided, regular reconciliation was not carried out by the funding agencies on the transfer of funds by the e-ticketing service provider to beneficiaries of the e-ticketing Bus Fare Assistance program.

Effects

Independent analysis and verification have not been made by the Ministry on the payments and top up of cards by the e-ticketing service provider. Any difference that may arise between records of each user kept by the e-ticketing service provider and that of each Ministry has not been identified and rectified. Therefore there is a high risk of fraud, errors and omissions in the payments made to the e-ticketing service provider.

Data analytics carried out during audit confirmed that in some instances the loaded amounts were more than the maximum approved limit. There was continuous acceptance of a wide range of identification cards for applications with more than one active card having references to the same identification. Section 5 of this report, under Themes 1 and 2 comprehensively details these findings with respect to differences noted when comparing data sets amongst the e-ticketing service provider and those of the two Ministries.

Good Practices

As at the time of the audit SOPs were still being developed by the MEHA and DSW.

It was noted that the DSW⁴⁵ had just started to receive detailed reports from the e-ticketing service provider including cards that have been blocked as well as those that have duplicates. In addition, the Department have now been provided access for funds tracking.

The Ministry of Education had informed audit that reports from the e-ticketing service provider will be incorporated in the draft Service Level Agreement. This section of the agreement is aligned to the revised draft Policy on Transport Assistance and the draft Standard Operating Procedures whereby the type of reports to be provided by the e-ticketing service provider will be clearly outlined.⁴⁶ This is currently in draft stages as consultations with the e-ticketing service provider was yet to be undertaken. A copy of the draft Policy on Transport Assistance and draft Standard Operating Procedures was provided to audit.⁴⁷

Expected Benefit

The clear understanding and communication of reports expected or required by the Ministry/Department and the e-ticketing service provider would be beneficial for monitoring, analysing and reconciling of data for quality feedback to management to assist in decision-making. For example, having a Service Level Agreement would improve data governance, processes for data quality practitioners to establish procedures for data quality control, which enables the identification of emerging data issues and the workflows for remediation.⁴⁸

Recommendations

- The MEHA and DSW should sign a service level agreement which includes reporting requirements with the e-ticketing service provider.
- The MEHA and DSW should obtain the required reports and ensure that procedures are in place on how to use the information in the reports and when exception reports should be obtained.

Theme 2: Regular Monthly Reconciliation

Audit Observation

We noted that regular reconciliations has not been carried out by the MEHA to reconcile its records against the records kept by the e-ticketing service provider through its electronic fund transfer payment platform. Similarly, the DSW did not reconcile funds used against the funds that have been loaded into each card including the balances available in each card.

⁴⁵ Comments received during Audit exit meeting with MWCPA on 28 April 2020

⁴⁶ Ministry's unsigned comments e-mailed to audit on 12/05/20

⁴⁷ Provided via e-mail on 19/05/20

⁴⁸ https://www.sciencedirect.com/topics/computer-science/data-governance-process

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Criteria

Each agency must have in place a cost effective system of internal controls which safeguards money and property against loss; avoids or detects accounting errors; and avoids unfavourable audit reports.⁴⁹

The Accounting head of an agency is responsible to the Permanent Secretary for the effective design and operation of internal controls across the agency.⁵⁰

Evidence and its Analysis

Enquiries carried out during audit⁵¹ with the Senior Accounts Officer revealed that reconciliation has not been carried out between the records kept by MEHA and the e-ticketing service provider since Nov 2017 till end of Term 1 for 2020.

The e-ticketing service provider has facilitated the Ministry with an electronic fund transfer system which allows the Ministry to keep track of the funds which have been disbursed to the students.

Although the electronic fund transfer system allows the Ministry to extract data relating to assistance provided in excel format there has been no periodical summarised statement at each month or end of each term from which reconciliation could be carried out.

Since the assistance was offered through the e-transport platform in 2017, no reconciliation has been carried out by the DSW with respect to 51,444⁵² records to compare against the records maintained by the e-ticketing service provider.

Causes

There has been no Standard Operating Procedures approved by the MEHA to guide the officers within the TAU Unit when receiving, evaluating and monitoring reports received from the e-ticketing service provider.

The Department of Social Welfare is yet to appoint someone as the reconciliation officer to carry out reconciliation for the program.

Effects

In the absence of regular reconciliations, the MEHA and DSW will not be able to proactively identify differences in the use of funds beyond conditions that have been approved. For instance, MEHA and DSW will not be able to trace the use of funds that takes place when each card is used after 5pm or before 6am for school children or higher than average use of cards for each elderly citizen.

⁴⁹ Finance Instructions 2010 Part 10 Internal Control, s59(1)

⁵⁰ Finance Instructions 2010 Part 10 Internal Control, s59(2)

⁵¹ As at 19/05/2020

⁵² As per file for loading in January 2020 provided on 8 Jan 2020.

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Good Practices

The MEHA had informed audit that requirements for monthly reconciliation is now incorporated in the Standard Operation Procedures which is currently in draft stages and will be implemented once it is approved.⁵³ A copy of the draft Policy on Transport Assistance and draft Standard Operating Procedures was provided to audit ⁵⁴

Expected Benefit

Proper reconciliation procedures would ensure that there is better awareness on the part of staffs who manage or administer the program. There would also be better management of funds including control on funds used to enable prudent accounting of public funds for students and elderly together with people with disability.

Recommendation

Standard Operating Procedures should be approved as soon as possible so that internal controls on use of public funds can be improved and any loss or misuse detected on a timely basis.

Theme 3: Initial Listing of Eligible Students

Audit Observation

There was no evidence to indicate during our audit that proper independent verification was carried out on the income of parents for students who have been assisted under the Bus Fare Assistance program either at the Ministry or school levels.

Criteria

All students whose parents' combined salary or income of \$16,000 and below are eligible to apply for assistance.⁵⁵

Evidence and its Analysis

The TAU does not have any documentary evidence that supports the assistance provided to each student in the listing of beneficiaries. It was noted that these are kept at respective schools with the school head teachers.

The approval given by schools is based primarily on the submissions and declarations of students and parents about family income. No independent verification of income is carried out.

⁵³ Ministry's unsigned comments e-mailed to audit on 12/05/20

⁵⁴ Provided via e-mail on 19/05/20

⁵⁵ Policy on Transport Assistance Clause 2 Approved by Minister on 21 January 2015 has been revised from \$15,600

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A review of application forms kept by two schools have been discussed in detail under Theme 8: Student Bus Fare Concession Application Process.

Causes

There are no established procedures in place to confirm the combined annual income of parents prior to approving applications under the program. Supporting documents indicating level of income earned submitted together with the application forms at school level are not independently verified with a third party. These includes salary slips and statutory declarations.

Effects

The lack of independent checks on declared income by parents at school level increases the risk of misuse of the assistance under the program by students whose parents have a combined income that is more than the approved threshold.

Good Practices

Audit was informed that the IT Unit of MEHA has commenced discussion with Fiji Revenue and Customs Services (FRCS) to verify the household income eligibility of parents for students assisted under the program. The Ministry has also reviewed its transport assistance application form which now has new provisions whereby the TIN of parents/guardian is to be filled in order to facilitate the data sharing and verification process with FRCS. In the absence of TIN, a signed statutory declaration form will act as a confirmation of income⁵⁶. A copy of the revised transport assistance application form was provided to audit.⁵⁷

Expected Benefit

An effective verification process will enable the Ministry to properly justify the listing for all the students that are currently being assisted through the program. This will ensure value for money as the assistance is only provided to those students that really need the assistance. Such controls will also reduce the risk of abuse of the program.

Recommendation

MEHA should enter into an agreement with FRCS to obtain regular confirmation of parents of students assisted under the program. Following confirmation, students who do not fall within the defined category should be excluded.

⁵⁶ Ministry's unsigned comments e-mailed to audit on 12/05/20

⁵⁷ Provided via e-mail on 19/05/20

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Theme 4: Exit by Elderly from the Bus Fare Concession Card

Audit Observation

E-ticketing bus cards for elderlies and disabled persons are topped up with \$40 credit every month. However, the audit noted that the current process did not have any control mechanism in place to stop direct reimbursement of e-ticketing bus cards for beneficiaries when they are deceased.

Criteria

The proper management of expenditure is fundamental to ensuring value-for-money in delivering services to the community. Having cost-effective internal controls within the purchasing and payments system plays an important part in ensuring that waste of funds, over-expenditures and corruption do not occur. ⁵⁸

Evidence and its Analysis

The DSW does not have any procedure or guideline to cease reimbursement of e-transport cards for senior citizens and people living with disabilities when they are deceased.

Discussions held with the Senior System Analyst and Assistant Director revealed that currently there are no agreements with the Registrar of Births, Deaths and Marriages. This will make it difficult to keep track of deceased beneficiaries who are assisted under the program.

In the absence of such controls, there is a high risk of assistance being continued to be provided to deceased beneficiaries which can also encourage persons who have access to the bus cards to continue to use the assistance provided without being detected resulting in wastage of funds.

Good Practices

The MWCPA⁵⁹ on 28 April 2020 revealed the need for life certification of elderlies that are still living. The Director of Social Welfare highlighted that the total registration included those living in the rural and maritime areas hence these members present a challenge when trying to classify those that are not active as no longer needing the assistance. There were some cards that are not frequently used as they would not be using the e-transport cards. Whilst verification of these beneficiaries could be carried out at village levels through the Turaga-ni-Koro, communication challenges has been identified by the department as an obstacle for this process. However, this can be rectified if the department liaises through the i-Taukei Affairs Board which deals directly with all provinces and Turaga-ni-Koro.

Since exception reports could now be provided by the e-ticketing service provider, genuine applicants who continue to live would find the time and resources to visit the Department and confirm themselves as they are still able to travel and make use of the transport assistance. The department was considering a time frame of five years as the periodical cycle for life certification of current beneficiaries.

⁵⁸ Ministry of Women, Children and Poverty Alleviation, Finance Manual 2017 Part 2: Expenditure, p 10
⁵⁹ Exit Meeting Minutes dated 28/04/20 with the Ministry of Women, Children and Poverty Alleviation

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Causes

Adequate resources for the program in terms of personnel have not been approved thus hindering the DSW's ability to carry out proper exit of senior citizens from the program. Due to the high pace in which the program was implemented, the Department had gone straight to providing the bus fare assistance program so that it could facilitate the beneficiaries through the bus cards.

Effects

Not having proper procedures and controls for the exit from the bus fare assistance-program will make it difficult to track e-cards which is not required to be in circulation and can lead to wastage of taxpayer funds. In addition, funds can be unnecessary held in the accounts of deceased beneficiaries.

Expected Benefit

Having an agreement with the Registrar of Births, Deaths and Marriages to advise the DSW upon the death of a recipient will help track those cards which are not supposed to be in circulation. Proper management of accounts of deceased recipients will reduce wastage of funds due to abuse or non-utilisation of the assistance provided under the program.

Recommendations

DSW should consider using life certification of beneficiaries or other methods such as confirmation from to Registrar of Births, Deaths and Marriages to ensure that deceased beneficiaries are promptly detected and assistance provided is withdrawn. DSW should also consider using its existing database for social welfare beneficiaries to detect such cases and vice versa.

Theme 5: Review of Transport Assistance Implementation for Senior Citizens and People with Disability

Audit Observation

Out of the eight recommendations made by its Monitoring and Evaluation Team, DSW has implemented only one recommendation with the remaining seven yet to be firmly resolved.

Criteria

The findings of the survey and the positive responses supports the continued use of the bus fare assistance program being implemented with tighter controls, enforcement, proper checks and balance in place with regular monitoring and evaluation.⁶⁰

⁶⁰ Busfare Concession Program Monitoring and Evaluation Report Conclusion-Pg. 19

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Evidence and its Analysis

As part of its annual action to improve the implementation of the program, the Department of Social Welfare produced a report prepared by its Monitoring and Evaluation Team in 2018. The report made eight recommendations as follows:

- (i) After comparing the two data sets, it has been noted that both sets are not reconciling, there seems to be more cases registered with DSW as compared to the payment list submitted by the e-ticketing service provider, a difference of 17,412 cases. This is quite a significant number so attempts must be made to find out the reason for these inactive cases because these numbers will continue to distort the figures, not giving the accurate picture of those actually assisted under this program.
- (ii) On the same note strategies must be developed and reviews conducted to identify those recipients that have passed away so that cases can be closed in the system.
- (iii) In regards to the different ID cards used in the issuance of the electronic bus fare cards, the only valid ID card to be used is the one issued by the Department, which is a photo ID with yellow colour for elderly and red for disabled persons. The e-ticketing service provider must ensure that their entire staffs issuing the electronic cards are made aware of this requirement.
- (iv) For ease of reconciliation, the e-ticketing service provider to provide the Department of Social Welfare with the monthly top up list, however, prior to that they must ensure that the data is updated and cleaned before submission.
- (v) Beneficiaries should produce their Social Welfare Bus Fare ID cards when using the bus services. This will need to be discussed with the relevant stakeholders.
- (vi) In regards to the information relayed by LTA on the abuse of the system, there is a need for the Committee to be setup to look into this. This will comprise of relevant stakeholders to monitor the progress of this program, likewise, develop strategies to minimize the abuse of the system. Committee to include MWCPA, Fiji Bus Operators Association, LTA & e-ticketing service provider. The committee to meet on a monthly basis and then phase out into a quarterly meeting. The committee to have a Terms of Reference (TOR) for better management and validation of processes.
- (vii) Due to the volume of information that needs to be reconciled, a dedicated officer is required to be appointed to carry out these monthly data reconciliations.
- (viii) Cards need to have expiry date and photo identification.

The Department has positively addressed the third recommendation with remaining seven recommendations representing work in progress and yet to be completed. No specific date has been set for full implementation of recommendations. Feedback from the Department to each of the above is as follows:

• The e-ticketing service provider is only updating active cards.

- The MWCPA data is accumulated from 2011 and are yet to conduct consistent reviews and termination of especially deceased cases.
- There may also be applications that had met the eligibility criteria cases and had obtained the cards. However, they are unable to use it in the Maritime areas or just keeping it as a form of ID.
- Ministry rarely receives information specifically on the deceased cases under this program. One of the strategies as highlighted by the district offices is to check against the list of deceased cases for other programs like Social Pension Scheme.
- The e-ticketing service provider has informed all its stores to use the MWCPA Bus fare ID cards to generate the electronic card for the recipients under this program.
- The e-ticketing service provider provides the list of cards topped up on the 1st day of the month. Further discussions will be held to obtain the list of all cards topped up during the month.
- It was highlighted in one of the meetings with Land Transport Authority and yet to be discussed with the Fiji Bus Operators Association.
- Committee yet to be established.
- Officer to work on reconciliation yet to be appointed.
- Card expiry with photograph is yet to be discussed with the relevant stakeholders.

Causes

There has been no thorough evaluation of the program in its implementation phase to ensure that an all-inclusive impact of the program is captured given limited economic resources.

Effects

An absence of a thorough review would result in the following:

- Compromises accountability and the department's commitment to improving its services to the senior citizens and people with disability.
- Contribute to lack of actions on current opportunities to improve workflow in providing services to the senior citizens and people with disability.
- Leads to the inability to identify and work on actions in its operations that provides the most value to its clients and is not realistic (creating superficial approach given the program objectives and its limited resources i.e. budgetary allocations).
- The Department would not be able to identify areas of learning which would in turn be applied to any of its current or upcoming programmes.

Good Practices

The MWCPA is working closely with the e-ticketing service provider and Land Transport Authority to deliver this program efficiently and effectively. The MWCPA ensures that only eligible applications are approved. The e-ticketing service provider issues e-transport card using the MWCPA bus fare ID card and the LTA team conduct spot checks and confiscates cards that are used by those that are not eligible to receive it.

Expected Benefits

Having a review would bring about improvements in accountability and strengthen the Departments commitment to improving its services to senior citizens and persons with disability.

Recommendations

It is recommended that the DSW:

- Should continue with its current efforts in reviewing the implementation of the recommendations by addressing the remaining recommendations as noted by its Monitoring and Evaluation team.
- Review the program to include updates or refinements as part of continuous improvement.

Theme 6: Review of the Students Bus Fare Assistance

Audit Observation

The audit noted that the Transport Assistance Unit was yet to take appropriate action on the findings of the Internal Audit team of the MEHA for assistance provided under the Transport Assistance Program.

Criteria

Each month, the Accounting Head must provide a signed and dated report to the Permanent Secretary to advise the current status of any unresolved external or internal audit issues.⁶¹Accounting Heads muse ensure all officers of the agency who are responsible for particular controls are aware of their responsibilities, including the need for managers to regularly rotate duties between staffs to a maximum of 3 years, where practical, to minimise and detect the possibility of fraud. These internal checks must be made in addition to any that are carried out by internal audit.⁶²

Evidence and its Analysis

A review of the draft Internal Audit report covering the year 2018 to Quarter 3 of 2019 revealed that six out of the 12 findings were related to the use of cards.

They are listed as follows:

- 1. Abuse of e ticket cards.
- 2. Control of subsidised cards.
- 3. Staff establishment.
- 4. Risk of loading ineligible students at input stage.

⁶¹ Finance Instructions 2010 Section 60(b)

⁶² Finance Instructions 2010 Section 61

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- 5. Proper documentation at input loading stage with schools.
- 6. Clear articulation of eligible conditions.

Update from the TAU revealed the following actions taken to address the above findings:

1. A 15-minute interval before second tap from the same card is allowed.

2. Limiting time when cards could be used term wise to term dates and daily from 6am to 5pm.

3. New TAU organisation structure has been approved but a copy was yet to be provided for audit review.

- 4. Currently with Head of respective school.
- 5. Currently with Head of respective school.
- 6. Ministry has signed a MOU with FRCS but a copy was yet to be provided to audit.

The report also focused on safety of transport but there were no reports for certain trips where bus with students inside have been involved in accidents.

Causes

The findings of the Internal Audit team have not been given due consideration by the management of MEHA.

Effects

Risk and control exposures highlighted in the report prepared by the Internal Audit team have not been addressed by the management of MEHA which can lead to wastage of funds and continued abuse of the program.

Good Practices

The audit was informed that the Ministry was currently reviewing and drafting its Policy on Transport Assistance, Standard Operating Procedures and Service Agreement with the e-ticketing service provider. The Ministry was also working with refining and making changes to FEMIS Transport Assistance reports and aligning it to the required reporting of the draft Standard Operating Procedures. The Ministry was also liaising with the e-ticketing service provider to align and merge its data reporting structure to FEMIS reporting.⁶³

Expected Benefits

Having a review done would bring about the improvement in accountability; enhances the Ministry's commitment to improving its services to students in future. Current remedial actions will be an inspiration to improve workflow and identify actions in its operations that enhances its value to the future of Fiji. It will also capture realistic scenarios to match the program objectives within its limited resources. This will also help to identify areas of learning which would in turn be applied to any of its current or upcoming programmes.

⁶³ Ministry's unsigned comments e-mailed to audit on 12/05/20

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Recommendations

It is recommended that the MEHA:

- Should ensure that recommendations in reports prepared by the Ministry of Economy's Internal Audit and Good Governance team are implemented on a timely basis; -and
- Review the program to include updated or refinements as part of continuous improvement

Theme 7: School Zoning

Audit Observation

A decade after the Cabinet ⁶⁴approval, students have been accepted and enrolled in schools outside of the 2km school zone. Funding of the program could be minimised if the Bus Fare assistance program enforces the school zoning policy requirements. More money is paid out when bus fare assistance to students are not restricted as per the school zoning policy.

Criteria

School home zone refers to a zone or area between residences of students or children located within 2 kilometres radius from the school. Urban schools are schools located in the urban, suburban and peri-urban areas less than 15 km from the nearest urban centre.⁶⁵

It shall be the responsibility of the PSEHA, in concurrence with the Honourable Minister for Education (hereinafter referred to as HME) to approve and determine the school home zones with clear boundaries for schools under the enrolment scheme. The PSEHA shall define the school home zone geographically for each urban and secondary school to clearly demarcate school boundaries. Such boundaries shall be furnished to each respective school so that it can be included in their enrolment scheme. This approval for school zoning to be done was seen as complementary to balancing limited resources to the right of parents to educate their children as per their wishes.⁶⁶

All schools shall formulate an enrolment scheme, aligned to the school home zone scheme as formulated by the MEHA, which shall outline a home zone with clearly defined boundaries that must be approved by the Permanent Secretary for Education.⁶⁷

In rare cases, attending out of zone schools shall only be approved under the discretion of the Minister or Permanent secretary for Education.⁶⁸

⁶⁴ Cabinet Special meeting held on 13th December 2009, Cabinet Paper CP (09)334

⁶⁵ Ministry of Education, Heritage and Arts, Policy on School Zoning in Fiji_3.0 Definitions, Page 3

⁶⁶ Ministry of Education, Heritage and Arts, Policy on School Zoning in Fiji_6.1 Enrolment Scheme, Page 6

⁶⁷ Ministry of Education, Heritage and Arts, Policy on School Zoning in Fiji_5.0 Policy, Page 5

⁶⁸ Policy on Transport Assistance, Section 6.11, Page 6

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Evidence and its Analysis

In 2010, a Cabinet approval was given to the Ministry of Education, Heritage and Arts for school zoning with the underlying principle that zoning will ensure that schools are adequately inhabited and there will be no overcrowding in schools as free choices in school environment will be restricted.

As clearly defined in the school zoning policy that the primary purpose of developing the policy is to provide a framework to guide the Ministry of Education, Heritage & Arts (MEHA) to address access, quality and equity in all schools in Fiji. The primary purposes of school home zoning constitute the following as below:

- (a) To avoid overcrowding, or the likelihood of overcrowding, at the school; and
- (b) To ensure that the selection of students for enrolment at the school is carried out in a fair and transparent manner; and
- (c) To enable the MEHA to make the best use of existing network of schools and educational resources;
- (d) To improve the performance by all schools and ensure equal distribution of high, average and low achieving students in all schools;
- (e) To ease traffic congestion and reduce travelling costs incurred unnecessarily by parents;
- (f) To enable proper and fair administration of provision of transport assistance to students;
- (g) To remove social stratification such as parents occupation, socio economic status, ethnicity and religious affiliation and encourage parents within the same zone to work together to improve the school.⁶⁹

All parents/guardians of students/children who opt to enrol their children "outside their school home zone" as per section 6.3 may not receive any transport assistance from MEHA.⁷⁰

A student's application form dated 27 May 2019 which was reviewed during the audit indicated that it was not approved by the Head of School on 10 June 2019. Application to attend the school was rejected as bus fare coverage and travelling time would be expected to be high. Audit verification with the FEMIS database noted that the student's name was listed as eligible and approved for student bus fare financial assistance.

Iai	Table 4.2: Student application in FEMIS disapproved by Head of School					
	ID Number	VF Number	Home Address	Head of School FEMIS Record	Verification	
8	332589	19815846027	Galoa Serua	Approved	Approved and loaded with bus fare assistance.	

Table 4.2: Student application in FEMIS disapproved by Head of School

Inconsistency was noted in this instance where an assistance was provided as shown on FEMIS even though the Head of School records show that the application had not been approved.

 ⁶⁹ Ministry of Education, Heritage and Arts, Policy on School Zoning in Fiji_1.0 Policy Objective, Page 2
 ⁷⁰ Policy on School Zoning in Fiji Approved by Minister for EHA in September 2017. Section 6.9.3

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Since the schools are isolated in the city boundaries far from large residential areas, the school needs to have its own demarcating policy to demarcate the acceptable zoning of residential areas accepted to attend its school.

ID Number VF Number		Residential zone to location of school (km)
1034291	0547351242(3)	27km
1046032	772652330	27km
888233	19889290771	23km
974467	24073578346	20km
833413	2156383002 1	46km

Table 4.3: Student application approved by head of school staying in far zone area

Other instances of students assisted beyond the required school zone can be found in Table 6.3 and Table 6.4 under the Appendix section.

On the other hand the policy outlines the following 10 exceptions that enable students to enrol out of the zone schools. The acceptable provisions for which students is allowed to enrol in out of zoning schools include the following:

- (a) The schools offers a program or subject combination that is not offered by the near zoning schools.
- (b) The student is enrolled in to a special program offered by the school such as special vernacular languages such as Vosa Vaka-Viti, Hindi, Urdu, Tamil, French or others.
- (c) The PSEHA has agreed and directed with the concurrence of the Minister that the student be enrolled in to the school; or
- (d) Preference of certain combination that are not offered by the school in the student home zone.
- (e) Preferences for vernacular subject such as Hindi, Na Vosa Vaka Viti, Urdu, Tamil, Telugu, Chinese languages such as Mandarin, French or Cantonese which may not be offered by a school within the school home zone.
- (f) One or both of the child parents is a teacher at the same school
- (g) One or both of the child parents work within the school zones
- (h) One of the child biological sisters or brothers are enrolled or teaching in the same school.
- (i) One or both of the child parents are school board members or school board employees.
- (j) Under special circumstances if a student require transfer from another school, the head of the school in which student wishes to enrol, agreed by agreement with the head of student previous school, to enrol the student, and the PSEHA endorses the proposal.⁷¹

The exceptions listed above are susceptible to manipulation enabling students from outside the 2km area to enrol in schools beyond the distance identified in the policy.

⁷¹ Ministry of Education, Heritage and Arts, Policy on School Zoning in Fiji_1.0 Policy Objective, Page 2

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Causes

The lack of enforcement of school zoning and poor controls and checks on the application processing has led to the non-compliances to the Policy on Transport Assistance and procedures discussed above.

Effects

The above exceptions has contributed to the primary objective of the zoning policy not being met. Consequently, the practice of enrolling students in schools out of their home zones contradicted the expected economical goal of accessing the same level of quality education at the nearest school. A sample of 2 schools within the Central Division revealed that more than 90% of the students receiving the assistance travelled daily to schools beyond the 2km school zoning policy. Generally, the seven primary purposes of the zoning policy have not been completely met as a large number of students continue to be assisted to attend schools outside the zoning policy.

Good Practices

We noted that it will be ideal for applications to have fields in the application form to factor in changes that have taken place during the school year. These include change of school; change of address; distance to nearest school by the shortest trafficable route; lodge by group that is by family instead of being on a one by one basis; include advocate details (respond to questions from TAU on behalf of the applicant); signed passenger student code of conduct to influence behaviour when riding buses; informing eligible students of processing time for each application when the form is completed.

Expected Benefits

Enhance the integrity level of declaration from parents and their students contributing to the Ministry not only being able to meet its original policy objectives but do so in an economical manner.

Integration of the school zoning policy with the Policy on Transport Assistance will allow the benefits of school zoning to accrue and at the same time save excessive assistance currently being paid which in some cases have not been properly authorised.

Recommendations

- MEHA should consider integrating the requirements of the school zoning policy into the Bus Fare Assistance program so that objectives of policies can be realised and the reduce expenditure incurred in funding of the program
- MEHA should also review applications for assistance outside zoning area and remove applicants which do not meet the criteria.

Theme 8: Student Bus Fare Assistance Application Process

Audit Observation

There is no provision in the Policy on Transport Assistance or its accompanying form for the Transport Assistance Clerk to sign and confirm that s/he has scrutinised and vetted the form before submitting it to the head of school. Furthermore, the policy does not have any provisions for an independent or third-party confirmation of the income source declared by parents.

Criteria

All students whose parents' composite salary/income of \$16,000⁷² or less is eligible to apply for assistance. It is mandatory for the applicants to provide all requested information in the Transport Assistance Application form. Salary slips of working parents shall be attached with the form. For applicants whose parents are without salary slips, a statutory declaration form shall be filled, witnessed by the relevant authorities and supported by the applicant's school teacher. Head Teachers / Principals shall carefully scrutinise the application forms and endorse them only if all the information are in order and complete. Application forms shall be distributed to all eligible students on the 1st day of school and shall be completely filled and returned to the school head by the end of the 2nd week of term.⁷³

Subsidised Fare

A student qualifies for 2 coupons if he or she travels on a direct bus or school bus, and 4 coupons if the child changes buses to and from school of the correct stage as per the approved list. The maximum fare per trip is \$0.80c; parents will have to pay fare exceeding \$0.80c per trip. At no time may a child be given more coupons than what has been assessed as per approved list. Head teachers and Principals shall adhere to this.⁷⁴ All students who wish to be assisted has to apply using the bus fare assistance application forms and submit them to transport assistance officer in their respective school, who shall stringently vet applications before submitting it to the head of school for approval. In rare cases, attending out of zone shall only be approved under the discretion of the Minister or Permanent secretary for Education.

E-ticketing Card

In cases where the smart cards is not recognized by the bus machines, students are kindly requested to note the message from the machine and lodge the problem to the school. Schools should be notified immediately in cases where the card goes missing.⁷⁵

Evidence and its Analysis

Since the implementation of the bus fare assistance program, changes have emerged that has enhanced and developed the program to align it with the government's initiative of technological

⁷² Revised to \$16,000 from \$15,600

⁷³ Policy on Transport Assistance, 6.0 Procesure_6.1 Application, Page 3

⁷⁴ Policy on Transport Assistance, Section 6.11, Page 6

⁷⁵ Policy on Transport Assistance, Section 6.12,p 6

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improvement. These also coincide with the three intended objectives of the program introduced in October 2017 which is to:

- (a) ensure improved collection of revenue and reduce fare evasion and the risks for passengers carrying cash;
- (b) remove revenue losses for omnibus operators and the State; and
- (c) Prescribe conditions and enforcement powers in relation to the use of bus cards and bus card readers.

In 2017, the government through the MEHA implemented e- transport cards for students travelling by bus, while those using carriers and boats transportation in rural areas are still using coupons, as network connection and installation of machine is a challenge.

There is no provision in the Policy on Transport Assistance with its accompanying form template to request each transport assistance clerk to sign on it to show that he or she has scrutinized and vetted the form before submitting it to the head of school.

The Policy on Transport Assistance and the application template does not make provision for an independent or third party confirmation of the income source declared by parent's e.g. Application forms for student whose parents are earning fixed annual income are not verified with other stakeholders such as FRCS through the parent's TIN number and FNPF to confirm the actual gross salary from FNPF deductions.

In addition, no provisions existed to enable each transport assistance officer or head of schools to demand for declaration of other sources of income of parents apart from the employment income declared.

Not all the clearly marked sections and fields on each form were completely filled. This included complete data not entered in to FEMIS, data entry checked as well as student ID number and student e-transport number. These are important fields that identify each student and determined whether a student's information have been included in FEMIS transport assistance modules or not.

Audit visited two prominent schools in the Suva district from 17th to 19th January 2020 to assess how the applications have been processed. The audit verified the processing of bus fare assistance applications and secondly noted the subsequent approval procedures to harness the processes and procedures.

The audit noted that some applications were not properly assessed, not approved according to the policy guideline during field visits.

It was noted that application for assistance of some students whose parents earned more than the \$16,000 income threshold were approved. Refer to table below for examples.

Student ID No.	E-transport Card No		Parents Income Recalculated
1034291	0547351242(3)	16,000	16,725.28

Table 4.4: Students with parents earning more than \$16,000 threshold assisted by the program

Student ID No.	E-transport Card No		Parents Income Recalculated
1046032	772652330	16,000	16,725.28
1083959	19930570452	15,000	16,244.80

Recalculations carried out during audit revealed that income declared in the applications do not correspond with the supporting evidence provided as proof of annual income.

It was also noted from the field visits that applications were approved although evidence supporting the information stated in application forms was not attached. Applications for a number of students whose parents were employed were endorsed by the head of school without payslip or other evidence of income. Similarly, applications for a number of students whose-parents were endorsed by the head of school even though statutory declaration forms were neither filled nor witnessed by authorized officers.⁷⁶

Student ID No.	E Transport Card No	Working Parents	Declared Parents Income	Payslip Attached
753740	19921	yes	10,000	no
1001197	1213149	yes	15,000	no
1118612	0547576842(9)	yes	5,000	no
873721	0548052906(3)	yes	11,090	no
959195	0551957482(5)	yes	8,000	no
925866	19823708532	yes	10,400	no

Table 4.5: Endorsed Applications of students with working parents

Student ID No.	E Transport Card No	Non- Working Parents	Declared Parents Income (Casual Income from Informal employment)	Statutory Declaration attached and witnessed by relevant Authorities	Application and scrutinized endorsed
974282	2156854282	yes	8,000	no	yes
Not known	Not known	yes	1,500	no	yes
1084379	5481270980	yes	n/a	no	yes
NF	0547576842(9)	yes	5,000	no	yes

Our review also noted that Heads of School did not endorse or stamp some applications forms before these were entered in to FEMIS. The FEMIS showed that these students have been approved to receive the assistance. Refer Table 6.1 in Appendices showing instances where this deficiency was observed.

⁷⁶ Administrative Officer, Education Officer, Medical Officer, Welfare Officer, Justice of the Peace, Labour Officer, Roko Tui, Provincial Administrator or Minister of Religion.

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The non-endorsement of application forms indicates non-compliance to the Policy on Transport Assistance. Therefore not all applications approved and loaded in the FEMIS database have been completely endorsed and verified.

Records in the FEMIS were not updated with names of the students that have been assisted under the bus fare assistance program. When reconciling the FEMIS records to the schools record quite a few numbers of students were yet to be updated in FEMIS. Refer to table 6.2 under Section 6 of this report for details of students name not updated in to FEMIS.

Causes

Periodical review of the policy was not been carried out . This includes related forms such as the template for application forms and internal checklist document by the MEHA.

Approval of bus fare assistance applications for students whose parent's income is more than the \$16,000 threshold indicates the lack of thorough assessment and absence of independent recalculation of parents' income using the payslips submitted.

The endorsement of unsupported application forms indicates that applications were not properly scrutinised prior to approval.

Non-verification of details in each form had resulted in approval of applications forms that have not been properly supported by a payslip and statutory declarations. Such approvals inspire boldness to partake in fraud and collusion between the assessing officers and parents.

Lack of regular updating of school file records into the FEMIS has resulted in differences in information reflected in school records when compared with the records generated from FEMIS.

Effects

The lack of review of the Policy on Transport Assistance and template and the lack of strategic direction have led to the above provisions not being integrated in to the Policy and related application template.

Including applications of parents earning above \$16,000 creates additional demand not only on direct funding but also on related administration costs.

The Transport Assistance Unit within the Ministry of Education loads eligible student's details for bus fare assistance in to the e-ticketing system based on the FEMIS records. Lack of procedures to guide the processing of applications and loading of reimbursements of assistance could result in improper procedures being undertaken in the provision of assistance to students.

Good Practices

The Ministry had informed audit that the draft Standard Operating Procedures section on "Application process for transport assistance" outlines the duties and responsibilities of the School Administration Officers and School Heads. It requires that the School Administration Officer (or similar) to conduct checks on all applications to confirm the forms have been filled correctly and that the documentation provided is complete. Any incomplete forms without the required documentation will be returned to the applicant. If all is in order, the School Administration Officer will sign the application form to confirm this is ready to be passed to the School Head. It also requires the School Head to review all applications and if they are satisfied all information is correct, they will endorse and stamp the application. The Ministry's IT Section is in process of verifying the incomes in liaison with FRCS. The Ministry further stated that the eligibility for transport assistance is mostly for those students whose families are in the informal employment sector. However, the Ministry will consider obtaining parent's contracts as basis of determining the annual incomes feedback on this will be obtained as well during the consultation process for the policy.⁷⁷ A copy of the draft Policy on Transport Assistance and draft Standard Operating Procedures was provided to audit⁷⁸

Expected Benefits

Proper processing of applications for assistance will ensure that each request for assistance is processed consistently and transparently. This can be brought about if there are sound controls in place for the program. It also contributes to identifying areas of improvement to reduce risk of abuse of the program.

Having a more systematic and controlled operation would improve efficiency in the operation and better service delivery in updating student records in FEMIS to reliable top up of e-transport cards.

Recommendations

The Ministry of Education should consider reviewing the Policy on Transport Assistance and application form to incorporate the following provisions:

- Transport assistance officer to sign off applications after checking and vetting them.
- The Transport Assistance Officers vetting and checks of applications to include recalculation of total income of parents and checking attachment of the required documents including the parents TIN and other sources of income.
- Confirmation of students information updated on FEMIS.

⁷⁷ Ministry's unsigned comments e-mailed to audit on 12/05/20

⁷⁸ Provided via e-mail on 19/05/20

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5.0 DATA ANALYTICS

This part of the report focuses on data analytics of information in the records maintained with the Ministry of Education and DSW together with the data collated from the e-ticketing service provider. This analytic approach is done for comparison purposes to obtain a viewpoint highlighting issues found when examining data integrity and integration. It also seeks how records can be further improved to allow for more reliable and accurate reporting for decision making purposes.

Theme 1: Data on Elderly and Fijians with Disability

Depicted below is the total population of the Elderly and People with Disability for the years 2011 to 2019 that were assisted by the Department of Social Welfare (DSW) under the Bus Fare Assistance program.

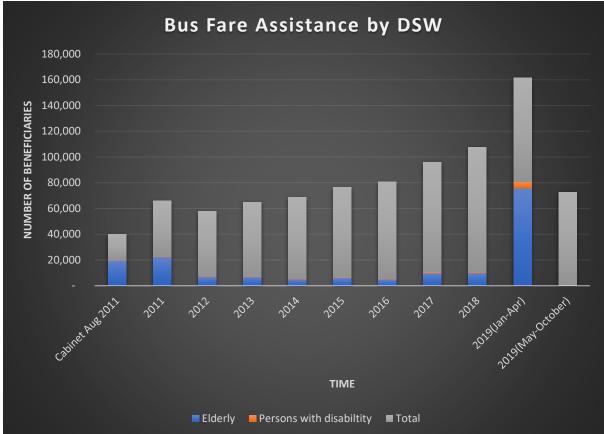


Figure 5.1: Number of Elderly and People with disability Assisted

Audit Observation

Scrutiny of the data on Bus Fare Assistance Program revealed the following observations that can be summarised as follows:

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- Other forms of ID was being accepted by the e-ticketing service provider apart from the normal ID issued by the DSW. We noted use of incorrect ID Type for registration of card users. Concession & exempt card holders should be registered using Social Welfare ID. However, during the audit we noted the use of birth certificates, drivers licence and many other IDs for registration purpose.
- 2. There were more than one user for one active ID. There were more than one card assigned to the same ID.
- 3. In some cases, Monthly loading on Exempt and Concession Cards was more than the monthly approved limit of \$40.
- 4. We also noted instances where funds were being incorrectly transferred to incorrect cards.

Further details are provided in the discussion below.

Evidence and its Analysis

Forms of Acceptable Id for Registration

We noted the use of incorrect ID type for registration of card users. Although concession & exempt card holders should be registered using Social Welfare ID, we noted that other non-social welfare cards (birth certificates, driver's license and many other IDs) were used for registration purpose.

Figure 5.2: ID Used for Registration



Source: OAG analysis based on information from service provider.

As shown in the pie chart above, the Social Welfare ID Cards issued by the DSW accounted for 88% of the applications registered while the remaining 12% made up of 19 other forms of secondary identifications.

Further review of the other IDs accepted for registration revealed that the Ministry has allowed for 19 different secondary types of IDs when processing around 93,003 applicants.

These included the following:

- 1. Voter registration
- 2. Driver's License

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- 3. FNPF Card
- 4. Passport 5. Birth Certificate
- 6. FIRCS
- 7. Others
- 8. FNPF/FRCS Card
- 9. Student ID
- 10. Photo
- 11. Citizenship Certificate
- 12. Employee ID
- 13. Reference Letter
- 14. Marriage Certificate
- 15. Police ID Card
- 16. VKB Certificate
- 17. Military ID Card
- 18. Extract Proof of Registration (Vola-ni-Kawa Bula)
- 19. Payslip

Same ID with More Than One Active Card

We identified events where more than one active card was registered to the same ID. Further review of the ID number noted that more than one card was activated for three ID users.

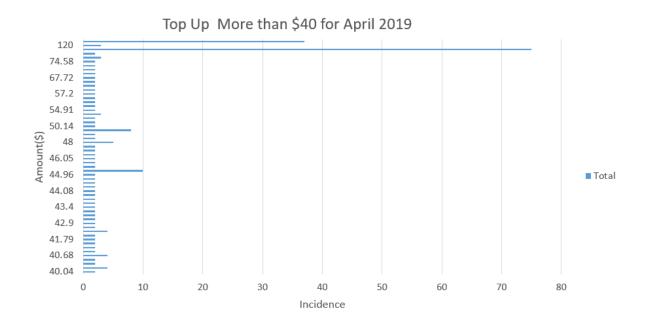
ID_NUMBER	CARD NUMBER	STATUS
2769	13932779468	ACTIVE
2769	23248171086	ACTIVE
58	18918045545	ACTIVE
58	5162864531	ACTIVE
70	1382139739	ACTIVE
70	5163266777	ACTIVE

Loading More Than Maximum Amount

Our audit found that monthly loading on Exempt and Concession Cards in some cases were more than \$40 in a month and funds were loaded more than once within a particular month. These observations were noted when reviewing cards loaded for the months of April, June, August and December during 2019.

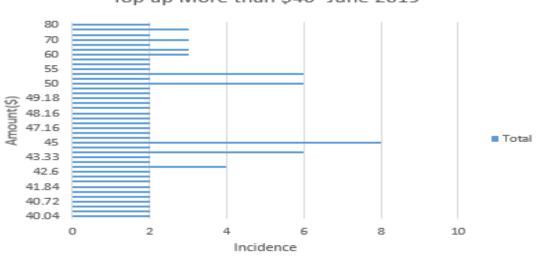
April 2019

The range of amounts topped-up was between \$40.04 to \$1,442.72; one particular card was topped- up 37 times with the total top-up amounting to \$1,442.72; \$80 was the most common amount when 37 cards were topped-up twice within the same month.



June 2019

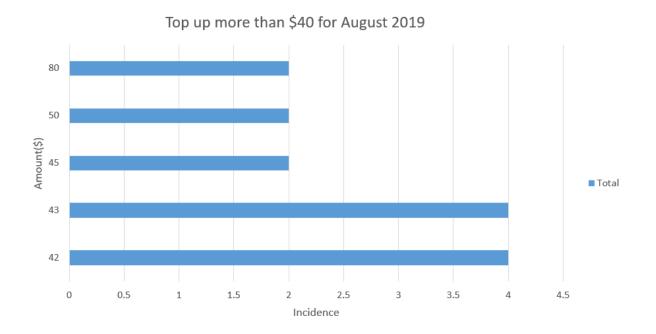
The range of top up recorded over the approved amount was from \$40.04 to \$80; one particular card was topped- up three times with the total top-up amounting to 237.33. Top-up amount of \$45 was the most common amount where four cards were topped-up twice.



Top up More than \$40 -June 2019

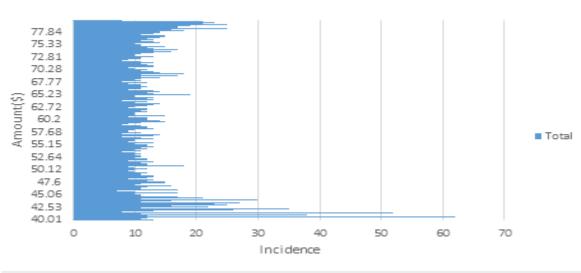
August 2019

The range of amounts recorded was between \$42 up to \$80; with two amounts (\$42 and \$43) recording the highest number of the amount topped-up.

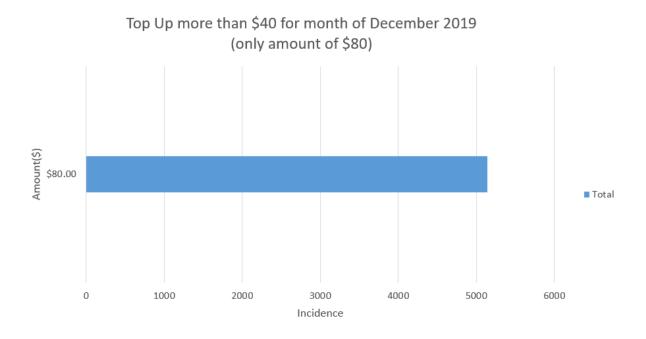


December 2019

When the amount of \$80 was removed the range was from \$40.01 up to \$110.00; the amount of \$40.68 recorded the highest number of top-up when 62 different cards were topped-up twice.



Top Up more than \$40 for month of December 2019 (excludes amount of \$80) It was further noted that the amount of \$80 was recorded as highest number of top-up where 5,144 different cards were topped-up twice as shown in the graph below.



Causes

The primary reason for the issues highlighted above is the lack of proper control over the program. Moreover, regular reconciliation has not been carried as this task has not been assigned to a responsible staff.

Accuracy has not been maintained on records retention with card numbers not streamlined to match the number of recipients. The total number of active cards should be equal to the number of recipients that currently receive the assistance.

At administration level, the Standard Operating Procedures has not been finalised to clearly specify the activities and acceptable level of input, process and performance from officers assigned to the program.

Effects

The contract agreement with the e-ticket service provider has been breached whereby only \$40 should be topped up on to the Concession & Exempt Cards.

It would be difficultly to identify the Social Welfare recipient since registration details have been incorrectly entered into the system. The Department will effectively account for any change when beneficiaries no longer need the assistance reducing the risks of leakages within the assistance.

There is high risk of misuse of funds and fraud as the same recipient will be receiving more when compared to other recipients.

Analysis carried out on the four months revealed that a total of 26,091 top ups with related value of \$1,652,027 have been incorrectly funded.

Expected Benefits

Better management of data can result in better monitoring of outcomes of the program. It also allows for better accountability to facilitate better decision-making when information from data is accurate. This will also ensure efficiency of the program by allocating limited resources available to achieve program output as identified in its objective.

Recommendations

- The DSW should carry out monthly reconciliation on the amounts loaded onto the cards of Welfare recipients against the amount used.
- Registration accuracy is a very significant issue, therefore the DSW should work with the e-ticketing service provider to identify incorrectly registered recipients and rectify the issue.
- The DSW should identify the cards that need to be blocked. It must constantly make sure that no recipient has more than one active cards registered to their name. Responsible party as per the agreement should be made accountable for amount(s) that have been incorrectly loaded these amounts should be refunded back to the correct party.

Theme 2: Data on Students

Details of students that were assisted on the Bus Fare Assistance program through e-Ticketing is depicted below:

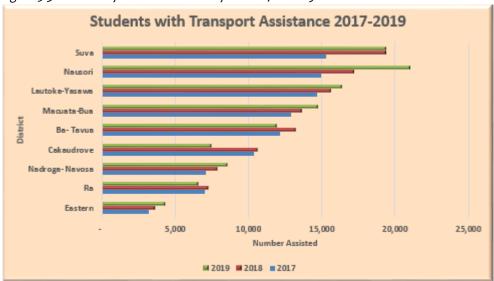


Figure 5.3: Number of Students Assisted from 2017 to 2019

Source: OAG analysis based on information from TAU

Audit Observation

A detailed comparison carried out on data as of 6 February 2020 between records maintained by the e-ticketing service provider and that of the Ministry highlighted the following gaps in data governance as indicators for areas of improvements:

- 1. A total of 148,893 Inactive cards have balances totalling \$2,972,684.40. Refer to table 6.5 under Appendix 6.0 for details
- 2. A total of 87,294 cards with funds that were incorrectly transferred amounted to \$745,318.73. The card holders of the new cards are not same as the previous card holder. Refer to table 6.6 under Appendix 6.0 for details
- 3. Validation of correct top-up could not be established as we were not provided with the relevant data needed to carry out this test. The data provided was incomplete. In the absence of required data, audit was unable to determine the manner in which the Ministry determined that the correct amounts were topped- up and how reconciliations are carried out. Data detailing the movement of funds within each card is not provided to MEHA. Instead the Ministry relies solely on data maintained by the e-ticketing service provider. Please refer to table 6.7 under Appendix 6.0 for details of incorrect transfers.
- Duplicate student ID was noted on active student cards although a student should have only one subsidized card registered under their names. Refer to table 6.8 under Appendix 6.0 for details.
- 5. Duplicate card numbers were also noted. Refer to table 6.9 under Appendix 6.0 for details.
- 6. The audit noted incomplete & missing data since MEHA is yet to update & maintain complete data sets.
- 7. The audit also noted incomplete data for student details. Due to incomplete data it was not possible to carry out reconciliation for amounts topped-up as MEHA did not disclose the total amount that is supposed to be topped-up on the student cards.
- 8. The audit noted improper registration and incorrect ID numbers being registered on to the system. Student ID numbers were not properly recorded including instance of duplicates noted within the service provider system. E.g. one particular student ID number was recorded 214 times. Refer to table 6.10 under Appendix 6.0 for details
- 9. Proper data management is not practiced by MEHA. The annual fare estimated by MEHA is not equal to the total amount topped up by the service provider.
- 10. The MEHA data shows the amount to be loaded onto the cards for 2019 should have been \$11,486,032 while the total value loaded for 2019 by the e-ticketing service provider was \$4,984,000 indicating an excess amount of \$6,502,032. Refer to table 6.11 under Appendix 6.0 for details

The issues noted above points out that these two data sets have not been properly matched off or if done but not so in a complete manner. All differences noted between the records kept by the service provider and those kept by the TAU of MEHA should be identified, interrogated, validated and cleared.

Evidence and its Analysis

Please refer to tables 6.5 to 6.11 reflected in Appendices 6.0 for further details of the audit findings.

Recommendations

- MEHA and DSW should work with the e-ticketing service provider to cleanse data by respective parties.
- Data governance framework including expected level of data quality should be included in the agreement between the MEHA and DSW and the e-ticketing service provider.

6.0 APPENDICES

Student ID Card	VF Card No	Year	Application Stamped and Signed
89221	19400257010	1004	No
1076617	2156791562	1004	No
786783	2404600090(7)	1004	No
882658	21560236586	1002	No
978909	1992803013 (9)	1301	No
901290	1983329925(8)	1105	No
NF	2156808938(3)	1105	No
1001197	None	1301	No
NF	NF	1102	No
NF	1982589733(3)	103	No
NF	NF	1303	No
888458	2156217002(3)	1002	No
NF	0547576842(9)	1003	No
873721	0548052906(3)	1001	No
978861	01151437173	1104	No
NF	NF	NF	No
881341	1939588549(4)	1004	No
892407	1939083845	1002	No
963809	0547189722(2)	901	No
959195	0551957482(5)	1303	No
925866	19823708532	1303	No

Table 6.1:: Students with unauthorised and unstamped applications

Table 6.2: Students list not updated in FEMIS

Student ID Card	VF Card No	Year	Updated in FEMIS
740736	24073933384	1301	No
755464	unknown	1302	No
756199	13937530189	1301	No
756424	18587334980	unknown	No
756424	18587334980	1202	No
762216	5477881122	1301	No
773549	19823746292	1203	No
789889	18587443948	1303	No
789889	18587443948	1303	No
793578	unknown	1206	No
815149	1154602138	1103	No
816703	19395884372	1106	No
816707	19398107730	1106	No
820218	21568451625	1006	No
827314	21562742508	unknown	unknown
827314	21562742508	1201	No
831467	1940052035	1203	No
838289	7724790980	1104	No
842361	19939090296	1006	No

Student ID Card	VF Card No	Year	Updated in FEMIS
849274	5481192580	1003	No
850040	1150661013	1006	No
861453	6010185863	unknown	unknown
861453	6010185863	1202	No
861973	19813027141	1302	No
863084	unknown	906	No
881352	2151993863	1006	No
881564	4954054930	1002	No
882806	7732599308	1104	No
888495	19927109819	1005	No
895988	1157257815	1005	No
895993	5171775579	1006	No
896062	21563316427	1001	No
896066	21560287944	1005	No
906409	19829305978	1103	No
926849	19828839894	1102	No
938137	5164001975	1206	No
954121	unknown	903	No
959092	19827190612	904	No
964737	unknown	904	No
983266	5472787620	1304	No
995520	2155947418	906	No
1009380	19832776850	1102	No
1014523	18899144424	1102	No
1040194	unknown	1004	No
1066832	19890163736	1302	No
1077872	13937978347	1303	No
7790126	5476505861	1205	No
8960854	5476099469	1004	No
919941353	19927704379	1002	No

SCHOOL 1							
Student	School class	Zoning Policy (KM)	Travelled (KM)	Excess KM			
1	10	2	60.1	58.1			
2	9	2	53.9	51.9			
3	10	2	42.5	40.5			
4	11	2	33	31			
5	9	2	33	31			
6	13	2	32.4	30.4			
7	9	2	32	30			
8	13	2	32	30			
9	9	2	29.1	27.1			
10	10	2	28.4	26.4			
11	10	2	28.3	26.3			
12	10	2	28.3	26.3			
13	10	2	27.7	25.7			
14	9	2	26.4	24.4			
15	9	2	26.3	24.3			
16	11	2	24.8	22.8			
17	13	2	24.8	22.8			
18	12	2	24.8	22.8			
19	11	2	24.8	22.8			
20	10	2	24.8	22.8			
21	10	2	21.4	19.4			
22	10	2	21.4	19.4			
23	12	2	21	19			
24	12	2	21	19			
25	9	2	21	19			
26	9	2	20.7	18.7			
27	10	2	20.7	18.7			
28	9	2	19.7	17.7			
29	12	2	19.5	17.5			
30	11	2	18.3	16.3			
31	10	2	18.1	16.1			
32	10	2	16.7	14.7			
33	9	2	16.7	14.7			
34	10	2	16.5	14.5			
35	12	2	16.3	14.3			
36	12	2	16.3	14.3			
37	11	2	16.3	14.3			
38	10	2	16.3	14.3			
39	13	2	16.3	14.3			
40	10	2	16.3	14.3			
41	9	2	16.3	14.3			
42	10	2	16.3	14.3			

Table 6.3: Incidence of Students beyond the Required Zoning Policy Area-School 1

SCHOOL 1				
Student	School class	Zoning Policy (KM)	Travelled (KM)	Excess KM
43	11	2	16.3	14.3
44	9	2	16.3	14.3
45	12	2	16.3	14.3
46	12	2	15.5	13.5
47	12	2	14.4	12.4
48	12	2	14.1	12.1
49	11	2	14.1	12.1
50	9	2	13.3	11.3
51	11	2	13	11
52	12	2	12.9	10.9
53	12	2	12.9	10.9
54	10	2	12.6	10.6
55	13	2	12.6	10.6
56	12	2	12.6	10.6
57	10	2	12.4	10.4
58	13	2	12.2	10.2
59	10	2	11.8	9.8
60	11	2	11.8	9.8
61	12	2	11.8	9.8
62	9	2	11.8	9.8
63	10	2	11.8	9.8
64	12	2	11.6	9.6
65	13	2	11.6	9.6
66	12	2	11.3	9.3
67 68	10 9	2 2	11.3	9.3 9.3
69	9	2	11.3 11.3	9.3
70	10	2	11.3	9.3
70	10	2	11.3	9.3
71	10	2	11.3	9.3
72	12	2	11.3	9.3
73	13	2	11.3	9.3
74	10	2	11.3	9.3
76	10	2	11.2	9.2
77	10	2	11.2	9.2
78	9	2	11.2	9.2
79	11	2	11.2	9.2
80	9	2	11.2	9.2
81	9	2	11.2	9.2
82	10	2	11.2	9.2
83	9	2	11.2	9.2
84	9	2	11	9
85	12	2	10.9	8.9

SCHOOL 1 Zoning class Zoning Policy (KM) Travelled (KM) Excess KM 86 9 2 10.9 8.9 87 12 2 10.9 8.9 88 11 2 10.9 8.9 89 11 2 10.4 8.4 90 11 2 10.4 8.4 91 11 2 10.4 8.4 92 13 2 10.4 8.4 92 13 2 10.4 8.4 93 13 2 10.2 8.2 95 9 2 10.2 8.2 96 9 2 10.2 8.2 97 9 2 10.2 8.2 100 11 2 10.2 8.2 101 10 2 10.2 8.2 101 10 2 10.2 8.2 101 10 <t< th=""><th></th></t<>	
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8811210.9 8.9 89 11210.4 8.4 90 11210.4 8.4 91 11210.4 8.4 92 13210.4 8.4 93 13210.4 8.4 94 12210.2 8.2 95 9210.2 8.2 96 9210.2 8.2 97 9210.2 8.2 98 11210.2 8.2 100 11210.2 8.2 101 10210.2 8.2 102 10210.2 8.2 103 9210.2 8.2 104 10210.2 8.2 105 9210.1 8.1 106 9210.1 8.1 108 10210.1 8.1	
8911210.48.49011210.48.49111210.48.49213210.48.49313210.48.49412210.28.2959210.28.2969210.28.2979210.28.29811210.28.29911210.28.210011210.28.210110210.28.210210210.28.21039210.28.210410210.28.21059210.18.11069210.18.110810210.18.1	
90 11 2 10.4 8.4 91 11 2 10.4 8.4 92 13 2 10.4 8.4 93 13 2 10.4 8.4 94 12 2 10.2 8.2 95 9 2 10.2 8.2 96 9 2 10.2 8.2 97 9 2 10.2 8.2 98 11 2 10.2 8.2 99 11 2 10.2 8.2 100 11 2 10.2 8.2 100 11 2 10.2 8.2 101 10 2 10.2 8.2 102 10 2 10.2 8.2 103 9 2 10.2 8.2 104 10 2 10.2 8.2 105 9 2 10.1 8.1 106 9 2 10.1 8.1 108 10 2 10.1 8.1	
91 11 2 10.4 8.4 92 13 2 10.4 8.4 93 13 2 10.4 8.4 94 12 2 10.2 8.2 95 9 2 10.2 8.2 96 9 2 10.2 8.2 97 9 2 10.2 8.2 98 11 2 10.2 8.2 99 11 2 10.2 8.2 100 11 2 10.2 8.2 100 11 2 10.2 8.2 101 10 2 10.2 8.2 102 10 2 10.2 8.2 103 9 2 10.2 8.2 104 10 2 10.1 8.1 106 9 2 10.1 8.1 107 10 2 10.1 8.1	
9213210.48.4 93 13210.48.4 94 12210.28.2 95 9210.28.2 96 9210.28.2 97 9210.28.2 98 11210.28.2 99 11210.28.2 100 11210.28.2 101 10210.28.2 102 10210.28.2 103 9210.28.2 104 10210.28.2 105 9210.18.1 106 9210.18.1 108 10210.18.1	
93 13 2 10.4 8.4 94 12 2 10.2 8.2 95 9 2 10.2 8.2 96 9 2 10.2 8.2 97 9 2 10.2 8.2 98 11 2 10.2 8.2 99 11 2 10.2 8.2 100 11 2 10.2 8.2 100 11 2 10.2 8.2 101 10 2 10.2 8.2 102 10 2 10.2 8.2 103 9 2 10.2 8.2 104 10 2 10.2 8.2 105 9 2 10.1 8.1 106 9 2 10.1 8.1 107 10 2 10.1 8.1	
94 12 2 10.2 8.2 95 9 2 10.2 8.2 96 9 2 10.2 8.2 97 9 2 10.2 8.2 98 11 2 10.2 8.2 99 11 2 10.2 8.2 100 11 2 10.2 8.2 100 11 2 10.2 8.2 101 10 2 10.2 8.2 101 10 2 10.2 8.2 103 9 2 10.2 8.2 104 10 2 10.2 8.2 105 9 2 10.1 8.1 106 9 2 10.1 8.1 107 10 2 10.1 8.1 108 10 2 10.1 8.1	
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108 10 2 10.1 8.1	
109 12 2 10 8	
110 10 2 10 8	
111 11 2 10 8	
112 12 2 10 8	
113 12 2 10 8	
114 9 2 10 8	
115 10 2 10 8	
116 9 2 10 8	
117 13 2 10 8	
118 13 2 9.8 7.8	
119 11 2 9.8 7.8	
120 10 2 9.8 7.8	
121 11 2 9.8 7.8	
122 12 2 9.8 7.8	
123 11 2 9.8 7.8	
124 12 2 9.8 7.8	
125 10 2 9.8 7.8	
126 9 2 9.8 7.8	
127 12 2 9.7 7.7	
128 10 2 9.7 7.7	

SCHOOL 1				
Student	School class	Zoning Policy (KM)	Travelled (KM)	Excess KM
129	11	2	9.6	7.6
130	9	2	9.5	7.5
131	11	2	9.5	7.5
132	9	2	9.4	7.4
133	11	2	8.7	6.7
134	12	2	8.6	6.6
135	12	2	8.6	6.6
136	11	2	8.6	6.6
137	11	2	8.6	6.6
138	9	2	8.6	6.6
139	13	2	8.6	6.6
140	12	2	8.6	6.6
141	10	2	8.2	6.2
142	9	2	7.2	5.2
143	10	2	7.2	5.2
144	10	2	6.6	4.6
145	9	2	6.6	4.6
146	10	2	6.6	4.6
147	11	2	6	4
148	11	2	5.8	3.8
149	9	2	5.8	3.8
150	12	2	5.7	3.7
151	11	2	5.3	3.3
152	10	2	5.3	3.3
153	11	2	5.3	3.3
154	13	2	5.3	3.3
155	10	2	4.7	2.7
156	12	2	4.7	2.7
157	9	2	4.6	2.6
158	11	2	4.2	2.2
159	11	2	4.2	2.2
160	12	2	4.2	2.2
161 162	10 9	2	4.2	2.2 2.2
162	9 12	2	4.2	2.2
163	12	2	4.2	2.2
165	9	2	3.9	1.9
165	10	2	3.9	1.9
167	10	2	3.9	1.9
167	10	2	3.9	1.9
169	11	2	3.9	1.9
170	9	2	3.9	1.9
170	11	2	3.9	1.9
		L	0.0	1.0

SCHOOL 1				
Student	School class	Zoning Policy (KM)	Travelled (KM)	Excess KM
172	12	2	3.9	1.9
173	11	2	3.7	1.7
Total for Sch	1,929.50			

Table 6.4: Incidence of Students beyond the Required Zoning Policy Area-School 2

	, ,	SCHOOL 2	,	
Student	School class	Zoning Policy (KM)	Travelled <i>(KM)</i>	Excess KM
1	13	2	40.1	38.1
2	9	2	33	31
3	13	2	33	31
4	10	2	28.5	26.5
5	9	2	25.3	23.3
6	12	2	23.5	21.5
7	9	2	23.5	21.5
8	13	2	22.7	20.7
9	11	2	20.1	18.1
10	9	2	20.1	18.1
11	10	2	17.8	15.8
12	9	2	15.9	13.9
13	10	2	15.5	13.5
14	12	2	15.5	13.5
15	10	2	15.5	13.5
16	13	2	15.5	13.5
17	12	2	14.9	12.9
18	12	2	14.9	12.9
19	11	2	14.9	12.9
20	11	2	14.9	12.9
21	13	2	14.9	12.9
22	12	2	12.6	10.6
23	10	2	11.8	9.8
24	13	2	11.8	9.8
25	13	2	11.8	9.8
26	13	2	11.8	9.8
27	11	2	11.8	9.8
28	9	2	11.8	9.8
29	11	2	11.4	9.4
30	11	2	11.4	9.4
31	13	2	11.3	9.3
32	9	2	10.7	8.7
33	11	2	10.1	8.1
34	13	2	10.1	8.1
35	12	2	9.9	7.9

		SCHOOL 2		
Student	School class	Zoning Policy (KM)	Travelled <i>(KM)</i>	Excess KM
36	9	2	9.9	7.9
37	10	2	9.9	7.9
38	10	2	9.5	7.5
39	10	2	9.5	7.5
40	11	2	9.5	7.5
41	13	2	9.5	7.5
42	13	2	9.5	7.5
43	11	2	9.5	7.5
44	9	2	9.4	7.4
45	10	2	9.4	7.4
46	10	2	9.2	7.2
47	9	2	8.8	6.8
48	13	2	8.6	6.6
49	11	2	8.3	6.3
50	10	2	8.3	6.3
51	11	2	8.2	6.2
52	9	2	8.2	6.2
53	11	2	7.9	5.9
54	13	2	7.9	5.9
55	9	2	7.9	5.9
56	12	2	7.9	5.9
57	11	2	7.6	5.6
58	12	2	7.6	5.6
59	11	2	7.6	5.6
60	9	2	7.5	5.5
61	10	2	7.5	5.5
62	11	2	7.5	5.5
63	11	2	7.5	5.5
64	10	2	7.5	5.5
65	11	2	7.5	5.5
66	10	2	7.1	5.1
67	9	2	7.1	5.1
68	10	2	7.1	5.1
69	9	2	6	4
70	11	2	6	4
71	9	2	5	3
72	11	2	5	3
73	11	2	5	3
74	11	2	5	3
75	12	2	3.3	1.3
76	9	2	2.3	0.3
Total for Schoo	12			759.8

STUDENT_ID	CARDNUMBER	STATUS	Balance as at 6th Feb 2020 (\$)
835434	19813868908	Inactive	6,289.35
963242	24044900900	Inactive	4,035.87
1006780	19403120850	Inactive	3,170.37
856361	19499445542	Inactive	2,819.81
806945	21568184747	Inactive	2,704.84
848528	05474514980	Inactive	2,295.61
910898	21562718185	Inactive	2,174.49
1156196	05477725864	Inactive	2,116.19
914889	19892613332	Inactive	2,079.35
867794	19398923896	Inactive	1,948.83

Table 6.5: Sample Of 148,893 Inactive Cards with Funds (Top 10 amounts)

Table 6.6: Sample Of 87,294 Card Where Funds Were Incorrectly Transferred (Top 10 amounts)

STUDENT_ID	Aparty ⁷⁹ Card Number	Bparty ⁸⁰ ID_Number	Bparty Card Number	Amount (\$)
856361	19499445542	830393	19926054453	2,829.33
741111	19813501384	126535806	16473346829	1,634.14
1082421	23260108842	710134	19934067893	1,463.97
1082421	23260108842	118705103	18916742028	1,419.43
867794	19398923896	0	12464634570	1,082.52
1114660	1154113979	867794	19398923896	1,022.52
1052154	18899958666	41731600513	13966293386	914.10
909455	5476510986	721363	13965072260	656.99
741183	13926061543	1195712	19938117975	616.77
1147341	5511033549	41731600513	24051792901	603.69

Table 6.7: Multiple Incorrect Transfers to IDs (Top 10 Transfers)

B_Party ID Number	Number of transfers
41731600513	2150
1705409	1489
134775908	1407
40700000000	949
830393	777
710134	762
125700409	732
17060100	729
1084519	655
38430700045	582

Table 6.8: Multiple Different Card Numbers Assigned To Same Student ID

Student ID	Number Of Different Card Numbers Student ID Is Assigned To
74286	14
1	53
na	116
779922	214

⁷⁹ Aparty refers to the primary card holder

⁸⁰ Bparty refers to the secondary card holder

PERFORMANCE AUDIT ON THE ADMINISTRATION AND MANAGEMENT OF BUS FARE ASSISTANCE THROUGH E-TICKETING FOR THE SCHOOL CHILDREN, ELDERLIES AND PERSONS WITH DISABILITY

Table 6.9: Cards Duplicated More Than Once

Car	ds Numbers	Number of Duplicates
232	61957643	2
232	62527403	2
240	50304583	2
198	17303944	2
195	02293061	2
194	98919307	2
198	12323145	2
188	92786825	2
194	93720742	2
055	18139786	2
139	32832580	2
077	28590345	2
011	62390932	2
188 194 055 139 077	92786825 93720742 18139786 32832580 28590345	2 2 2 2 2 2 2

Table 6.10: Duplicate Student IDs Present In the System.

Student ID Number	Count Of Card with Same Student ID
779922	214
na	116
1	53
74286	14
000000	14

Table 6.11: Amount per MEHA vs Amount By Service Provider (Top 10 amounts)

E Transport Card Number	Card Numbers	Annual Fare as per MOE	Total amount topped Up by VF	Difference
13927966989	13927966989	1,742.20	133.74	1,608.46
19800983942	19800983942	1,618.56	39.67	1,578.89
19391308533	19391308533	1,742.20	229.40	1,512.80
21562541702	21562541702	1,523.02	141.60	1,381.42
18893924904	18893924904	1,348.80	36.83	1,311.97
19815820741	19815820741	1,348.80	51.00	1,297.80
23258449323	23258449323	1,348.80	51.00	1,297.80
19811808260	19811808260	1,315.08	31.73	1,283.35
19830457172	19830457172	1,303.84	37.40	1,266.44
23257026924	23257026924	1,315.08	51.00	1,264.08



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