Publication of education agent performance data

Navitas Position Paper

February 2019

Navitas welcomes the opportunity to provide a submission on the publication strategy regarding education agent performance as detailed in the Department of Education and Training's policy paper (the Paper).

Executive summary

Navitas are highly supportive of the publication of robust and detailed education agent performance data.

Navitas strives to work only with high quality agents. The management of these relationships, the performance and professionalism of our agents and how well they meet the needs of our students is fundamental to our operations. Navitas supports the development of any tool that assists in managing agent relationships, compliance and integrity issues. The provision of agent performance data would augment Navitas' existing data resources and provide further scope for deeper analysis and benchmarking.

A wide range of staff within our organisation (and the sector more broadly) would access, evaluate and use agent performance data, both for operational and strategic purposes. This would include all staff who deal with agent relationships such as those working in student recruitment, international admissions as well as compliance.

There are three primary uses for education agent performance data including:

1. Benchmarking of agent performance.
2. Procurement of agency services and evaluation.
3. Integration of agent performance data into existing Navitas data resources.

In view of these likely uses, Navitas proposs 45 variables for consideration by the Department (see Appendix 1). Navitas recommends that the accessibility of performance data be a paramount consideration, so that the data may be manipulated to meet organisational needs. Furthermore, this data should be well documented, regularly published and permit detailed time-series analysis. Navitas also propose that the Department consider tracking similar variables for non-agent recruited international students so as to create a useful comparative data set.

Navitas are willing to work closely with the Department in discussing or implementing any of our recommendations or provide feedback on future iterations of the publication strategy.

Response

The following sections address the key questions in the Department's Policy Paper.

Users

The following Navitas staff will find education agent data useful:

- Staff that recruit students, or are involved in processing applications for admission into Navitas colleges and related companies.

- Staff that deal with agent contracts, commissions, or incentive schemes.

- Staff who deal with compliance issues surrounding agent performance and behaviour.

- Staff that analyse data on agent recruitment performance, student performance (retention and progression) and recruitment process efficiencies.

- Staff who deal with strategic issues surrounding agent relationships.

More specifically within Navitas, the following positions would find agent performance data useful:

- Group CEO and Divisional CEOs – from a strategic perspective.

- General Manager, Global Recruitment and Vice President, Global Recruitment and Development – from a strategic and operational perspective.

- General Managers for Sales and Marketing – from a strategic and operational perspective.

- Directors of Sales Effectiveness – from a compliance perspective.

- Staff involved in global sales and marketing functions including: Regional Sales Directors; Directors of Marketing and Admissions at our Colleges; and Channel Partner Services Managers – from an operational perspective.

- The Government and Stakeholder Relations team – from a strategic and advocacy perspective.

- General Manager, Quality and Compliance – from a compliance and regulatory perspective.

- Regional data protection managers and the risk and compliance teams – from a compliance and regulatory perspective.

Predicted use of data

Navitas would likely use agent performance data in three key ways:

1. *Benchmarking agent performance*

   Agent performance data will allow Navitas to evaluate the value of agency services and their performance during their contracts.

   This data will allow providers to answer questions such as:

- o Which agents are delivering us the highest quality students?

- o Are the students education agents are recruiting genuine?

- o How often are the students recruited by an education agent rejected for a student visa?

- o How does an agent's performance for Navitas compare to their performance for other organisations? For example by, market, level of study, agent office/branch (where there is more than one), and field of study.

- o Are the students the agent recruits on our behalf performing well in their chosen course?

  - ▪ Navitas expects to be able to blend agent data provided by the Department with data held privately on Navitas systems to generate valuable insights.

Generally, Navitas users want to be able to use such data to evaluate/compare an individual agent (or group of agents) performance against a range of benchmarks, including:

- ▪ state (Australian jurisdiction)

- ▪ national

- ▪ sector (HE, VET, ELICOS etc)

- ▪ market (source country), preferably with city / province or state level data

2. *Procurement of agency services*

Recruitment agents often approach providers such as Navitas seeking commercial relationships. Agent performance data would assist in evaluating the viability of collaborating with certain agents in particular regions throughout the world. For example, data on an agent's visa approval rates would assist in determining an agent's capability regarding Genuine Temporary Entrant (GTE) requirements. Education agent performance data therefore informs due diligence when contracting (or recontracting) with new or existing education agents.

3. *Integration of agent performance data into Navitas' data systems*

Navitas relies upon a vast number of internal and external data sources in order to inform strategic direction and create operational efficiencies. This data may include information on international student admissions processes, or data around industry trends on international student enrolments and commencements made available by the Department. There would be demand from the sector to have the ability to integrate agent performance data into a provider's own datasets and dashboards. Such capability would make deeper insights available to decision makers throughout the organisation.

Suggested variables and metrics

A large and robust education agent data set should be built on a range of useful variables and metrics**.**

Navitas has identified a list of 45 highly useful variables (see **Appendix 1** 'the data dictionary') that would be used to benchmark and evaluate education agents.

The data dictionary also provides sample values for the listed variables to provide the Department with some clarification around our thinking. Navitas acknowledges that some of the variables are already noted in the Department's policy paper, however these have been included in the full list for the sake of completeness. Navitas understands that most, if not all, of these variable are currently captured in the PRISMS database.

Further data considerations are also discussed below under *Data quality and coverage*.

Publication format and location

Users of education agent performance data must be able to transform agent performance data into a format that suits the needs of their organisation. The data must be able to be fully manipulable. Navitas' preference is for a data file to be made available in a 'flat file' format such as tab delimited or comma separated values (CSV) format as these formats offer the most flexibility in manipulating data. Ideally, the file would just be in a tabular format with a record per row.

An open and editable pivot table similar to the International Student Data pivots made available by the Department and Australia/Austrade would be a valuable, but this would be an optional add on. Navitas would not object to some simple data visualisations, possibly delivered via a platform that allows a dynamic and drillable interface such as PowerBI or Tableau.

Navitas requests that the data be provided with actual values at granular levels, preferably without data obfuscation.

Publication location & timing

Navitas recommends that participating providers access education agent performance data via a secure environment. The distribution of international student data via Austrade's Market Information Package is a good example to follow. In terms of timing, at a minimum Navitas recommends quarterly updates of agent performance data.

Data quality and coverage

Navitas suggest the following items for consideration when examining data quality and coverage.

Tracking instances of institution hopping

Navitas recommends the Department provide data that would allow providers to track students that have changed agents after commencement of their course at their original provider, but before the conclusion of their program. This

would assist providers – and the Department and regulators – identify which agents may be facilitating course hopping. Again, this would support the use of only high quality agents in the sector.

Student duplication and multiple agents

International students have the ability to change agents throughout the recruitment process. For example, an international student may use an agent to prepare application documentation for a provider but then later switch to another agent to assist with their student visa application.

In the case where two agents may be attached to an individual student application, the Department should document what agent relationships are recorded, what may be excluded and on what basis performance is measured. The Department should make sure it proposes a clear and consistent approach to dealing with such anomalies, while making these rules and assumptions clear within the data file.

Scope of analysis

Navitas would like clarification on whether or not the Department will be publishing data predating the mandatory entry of agent data into PRISMS that came into effect on 1 January 2018. If pre-2018 data is included in the agent performance data file, a caveat on accuracy and integrity of the pre-2018 data should be published within the data file.

Assumptions and data collection methodology

The resulting agent performance data file should ideally contain details of the data collection methodology, all assumptions and a complete data dictionary with definitions and use case examples.

Agent and non-agent recruited students

Navitas strongly recommends that the same data variables outlined in Appendix 1 are stored and published for *both* agent and non-agent recruited international students – preferably in the same data file. This is valuable information that will permit providers to analyse and compare the performance of students who are agent recruited versus non-agent recruited.

Navitas believes the ability to be able to compare such performance across the same group of variables would provide great insight for the sector, particularly as more providers explore direct recruitment channels. Such an ability gives another lens through which to assist providers in strategic and operational decision-making.

Time series analysis

The data specified in Appendix 1 should be able to be queried in a snapshot format. That is, the data must be able to have Previous Corresponding Period (PCP) analysis undertaken, such as available on the international student data's monthly releases. For instance, users of the data should be able to compare agent performance data in Quarter 1 2019 versus the same time in the preceding period (e.g. Quarter 1 2018).

Financial years / calendar years

Navitas would also like the data structure to provide for both financial years and calendar years (possibly covered by simply using the snapshot date variable suggested in Appendix 1).

Submitted by Navitas Limited

Level 8, Brookfield Place

125 St Georges Terrace

Perth WA 6000 Australia

Contact: Kadi Taylor – Head, Strategic Engagement and Government Relations

(Kadi.Taylor@navitas.com or 0498 020 978)

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Appendix 1: Variables and sample data dictionary for Education Agent Performance Data Review

Variable group	Variable	Description / Question
	Data snapshot date	A variable to indicate the age of the dataset.
Student variables	Student identifier	A unique anonymous identifier in order to be used to calculate accurate headcounts in data collection.
	Student recruitment channel	A flag variable to indicate if a student has been recruited by an education agent or not.
	Source country	Country of citizenship.
	Source state/province/suburb	A more granular location variable so providers can examine the data regionally within a country. The lower level of granularity, the better.
	Prior highest award	A variable to track what was the highest level of study/award the student had achieved before applying to study in Australia.
	Recruitment location	A flag to indicate if the student was recruited onshore in Australia or offshore.
Agent variables	Agent identifier	A unique identifier to identify an individual agent *branch*. This may be one agent working in isolation or part of a large network of agents.
	Agent description	A text description of the agent.
	Agent network	If the agent is part of a network, the network they belong to.
	Agent country	The country in which the agent operates. Again, the more granular, the better.
	Agent state/province/suburb	Specific address details of the agent. The lower level of granularity, the better.
	Agent visa approval rate	The agent's visa approval rate at the time of the data snapshot.
Provider / Course related variables	Provider identifier	A unique provider number for the provider the student is studying at (could be CRICOS number or some other identifier).
	Provider name	Plain English description of the provider.
	Provider location	The location of the provider where the student is studying or intended to study.
	Course identifier	A unique identifier to identify the course the student is studying or intended to study (could be the CRICOS course number or some other identifier).
	Course description	Plain English description of the course the student is studying or intended to study
	Course broad field of education	The relevant broad field of education for the course (as per HEIMS classification).
	Course narrow field of education	The relevant narrow field of education for the course (as per HEIMS classification).
	Course detailed field of education	The relevant detailed field of education for the course (as per HEIMS classification).
	Course level of study	The relevant level of study that the course is classified for.
	Course sector	The sector in which the course is classified.
Recruitment/admissions related variables	Application count	Variable to count how many times a student has applied to this provider for a particular course.
	Offer count	Variable to count how many offers have been generated by this provider for a particular course.
	Acceptance count	Variable to count how many instances has a student accepted an offer to study a particular course at this provider.
	Preference change count	Variable to count how many times a student has changed course preference before commencing study at the provider.
	Study commenced flag	Has the student commenced their study?
	Study commenced date	Date study has commenced.
	Non-commencement reason	Latest reason for non-commencement of study provided by student/agent.
Visa related variables	Student visa application date	The date the student applied for a visa to study in Australia.
	Student visa outcome date	The date when the student visa outcome was finalised
	Student visa outcome	The description of the visa outcome (for instance granted, refused, withdrawn, invalid).
	Student visa application location	The office or branch of Australia's consul where the visa application was processed.
	Student visa cancelled flag	Flag to indicate if student visa was cancelled.
Student performance and progression	Study complete flag	Has the student successfully completed their enrolment?
	Study completion date or intended completion	If the student has completed, then the completion date. If study complete flag is null, then this is the date when the student would have completed.
	Study terminated flag	Has study been terminated?
	Study termination reason	If study has been terminated, then for what reason did the student fail to progress? (use a list of predefined descriptive categories, not free text)
	Study course change count	How many times has the student changed course within current provider?
	Study defer/suspend flag	Has the student deferred or suspended their study?
	Study course fail count	How many fail grades have been awarded to the student during the course of their study?
	Student transferred	Did the student transfer to another provider?
	Study high achievement count	How many high achievements were awarded to the student during the course of their study?
	Current course grade point average	What is the current grade of the student?