

Navitas Submission on the Redevelopment and Audit of the Higher Education Student Data Collection

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1 Single touch reporting

1.1 Enter your data once

Proposal:

New submission methodologies can enable student data to be entered once at the higher education provider.

Those data can then be automatically validated to identify any errors that may have been made. Under a new system, reporting effort would be spent responding to the small number of errors rather than manipulating, interrogating and manually submitting large datasets at multiple points in time.

Question 1: How might we implement single touch reporting?

Navitas fully supports the proposal to move to single touch reporting and acknowledges the wide range of benefits for learners, providers and government agencies.

Further, Navitas sees an opportunity for single touch reporting to not only streamline data reporting, but also to align the timing of various data submission requirements. Many of Navitas' colleges are dual sector providers that also have CRICOS registration. The alignment of data submission dates across programs such as FEE HELP and VET Student Loans (VSL) and other reportable programs would mean a significant reduction in administrative burden for providers. An example of this in practice, is the requirement to report FEE-HELP liabilities in HEIMS for higher education learners within four weeks of any census date and then the requirement to do the same for a VET census date for VSL, which means two different submission dates.

Regarding how single touch reporting might be implemented – and noting Navitas does not have a detailed understanding of current government data and ICT systems and capabilities – it would seem that this could be achieved with the development of two related systems.

First, a student portal linked to the Unique Student Identifier (USI), that may be built as part of MyGov, would enable learners to keep their personal data current themselves. This would mean providers would not have to gather, enter, validate and submit this data multiple times. Providers would then have access to their learners' data via the USI system which would need to be interoperable with the institution's systems.

Second, the technical advancements of Application Programming Interfaces (APIs) will provide an opportunity to move away from the traditional 'push' model of data reporting. For providers, this will mean instead of having to provide data in a format and at a time determined by the government agency, an API allows the required data to be extracted directly from our systems. Navitas is currently building this capability into various systems across our operations.

2 Identifying students

2.1 A comprehensive student identifier

Proposal:

Replace the CHESN with the USI, and extend the requirement to use this identifier to all higher education students.

All privacy impacts would be managed according to the Australian Privacy Principles and guidance from the Office of the Australian Information Commissioner.

Question 2: What is the most efficient way to identify higher education students throughout their study?

Navitas supports the government's intention to expand the Unique Student Identifier (USI) currently in operation in the vocational sector to higher education. We support a truly 'unique' identifier that would be attached to a learner and remain constant throughout their whole tertiary study journey.

The changes in work, society and therefore education, means that a learner is likely to engage in study across the VET and higher education sector multiple times throughout their life. A system that allows a learner to record and track their formal, accredited learning journey across the whole tertiary sector is a positive outcome.

As noted above, Navitas' colleges work across higher education, VET and international education so we see one unique number that applies across those three sectors as being highly beneficial. There are some practical implications of the implementation that would require further consultation with providers and other stakeholders, such as:

- the timing of when a learner needs to apply for a USI
- arrangements for current learners
- the lead time for implementation given providers would need at least six months to make the necessary changes to student management systems, policies and procedures
- arrangements for any period of transition where CHESNs are being phased out and USIs introduced
- how CHESN data will be maintained for record keeping purposes.

3 Reducing duplication

3.1 Discontinuing Department of Human Services reporting

Proposal:

Investigate the most efficient way to incorporate requirements for the Department of Human Services into the Collection with a view to removing the separate reporting requirement.

Question 3: What challenges could there be in meeting these reporting requirements and how might we overcome them?

Response:

Navitas supports the proposal to incorporate the Department of Human Services' (DHS) requirements into the Collection in order to remove the need for a separate reporting mechanism. There are benefits for providers in reducing the administrative burden and for all stakeholders with a likely reduction in the error rate of the data. Incorporating this change into the proposed HEIMS redevelopment and the single touch reporting initiative would be highly beneficial.

One element that should be addressed in this process is that the current DHS form is designed for higher education providers with a two semester academic year. It does not accommodate providers – like Navitas – who operate on a three trimester basis.

Finally, consideration should also be given to how information, once supplied, can be amended when a learner has a change in their circumstances. This is an important consideration given the implication for a learner's student support payments.

4 Relevance

Reducing the size and complexity of the Collection

4.1 Commonwealth assisted students submission (HELP Due)

Proposal:

Reduce the data collected in this submission to just the minimum elements required by the ATO to verify a student's TFN.

4.2 Student Enrolment File

4.2.1 Research Training Scheme (RTS)

Proposal:

Remove these superseded elements

4.2.2 Parental educational attainment

Proposal:

Remove these superseded elements from the Student Enrolment file

4.3 Past Course Completions submission

Proposal:

Remove the elements from the collection.

4.4 Commonwealth Scholarships Submission

Proposal:

Delete these elements to provide a smaller, more targeted submission that is more appropriate to the new arrangements for indigenous support.

4.5 Commonwealth Scholarships Offers submission

Proposal:

Remove this submission from the Collection, with providers only required to maintain one direct method for reporting Commonwealth scholarship offers.

4.6 Reducing duplication within the Collection

Proposal:

Restructure existing submissions to collect enrolment and name and address data once only at the commencement of a student's course and provide a simple mechanism to update details as/if required. Unit of study (load) data would then be reported independently as required for the duration of the student's course.

Question 4: Do you see value in retaining any of the elements discussed above?

Response:

Navitas supports the proposal to remove all but one of the proposed elements from the Collection. To be clear, Navitas supports the removal of the elements noted in 4.1, 4.2, 4.2.1, 4.3, 4.4, 4.5 and 4.6.

However, Navitas does not support the removal of 4.2.2 'Parental educational attainment'. It is widely acknowledged that a parent's educational attainment is a strong indicator of learner success. The ability to be able to link a parent's attainment to an individual learner – as opposed to a cohort for the purposes of socio-economic status calculations – is important for providers. It is important that providers have access to this data to identify learners at risk, to improve retention and ultimately support learner success.

Notwithstanding this view, Navitas also acknowledges that this information is often hard to gather from learners, particularly international students. Therefore, consideration should be given to including this data point when learners apply for a USI. It should be accompanied by sufficient explanation to allow learners to make an informed submission, e.g. a table with general international equivalence.

Again, consideration must be given to the implementation timeline for any such changes given the implications for providers' systems, policies and procedures.

Question 5: Are there other elements that no longer serve a purpose and so should be removed from the Collection?

Response:

Having reviewed the submission data file specification on HEIMSHelp, Navitas does not recommend any other elements be removed from the Collection.

Question 6: Should the scope of the Collection be expanded to better identify Work Integrated Learning (WIL) in higher education?

Response:

In principle Navitas supports the expansion of the Collection to better identify Work Integrated Learning (WIL) in higher education. The ability to collect and analyse data in this area would be valuable for policy makers, providers, learners and employers. There are, however, a number of issues to consider in its implementation:

- The definition of WIL and the categorisation of its various forms must be able to be effectively captured in the Collection to reduce the administrative burden on providers and ensure high quality data is collected
- Many higher education programs require WIL as part of their professional accreditation and registration, so this mandatory WIL needs to be appropriately captured
- At what level is this information best captured: is it 'attached' to the program level, unit of study level or individual learner?
- Timelines for implementation must again ensure providers have sufficient time to adapt to the changes.

Question 7: What opportunities do you see for reducing the duplication of data across submissions?

Response:

Navitas does not have any further suggestions for reducing the duplication of data across submissions, beyond those that have been made above, particularly those relating to alignment of submission dates and a student portal connected to the USI.

5 Low quality data

5.1 Overseas student fees

Proposal:

Report the total tuition fee for an overseas student once only, on commencement of the student's course. This would include a fee for all overseas students who are subject to the minimum indicative fees and the course is delivered by a third party.

5.2 Misreporting "no information" location codes

Proposal:

Remove the "no information" codes from the three elements so that only a valid postcode can be reported for each location element.

5.3 Course and campus names

Proposal:

Develop clearly articulated, agreed standards for reporting of course and campus names and provide more comprehensive explanatory information.

This would enable organisations to use one set of course data for more than one purpose, including the provision of course data to other organisations such as Tertiary Admission Centres or the Australian Course Information Registry.

5.4 Credit transfer arrangements

Proposal:

Review the elements to ensure they are fit-for-purpose and can be interpreted consistently by all providers.

Part of that review could also consider if an integrated VET / Higher education unique student identifier would be capable of observing students' pathways to higher education.

5.5 Highest Participation prior to commencement

Proposal:

Review the codes and coding notes for this element to clarify how participation should be reported.

5.6 Campus submission

Proposal:

Revisit what information is most appropriate to collect in relation to campuses and how best to collect it.

The department is currently undertaking a discovery project to determine the scope of the Higher Education Admissions Information Platform. The Platform is a recommendation of the HESP's report into admissions transparency and will ensure information is centrally located and comparable for students.

5.7 Australian Tertiary Admission Rank (ATAR)

Proposal:

Report only raw ATARs for all commencing students under Element 369 in the student submission.

Consider whether new elements should be introduced to allow bonus points to be reported, potentially including the reasons for allocating the points.

Note that a separate implementation working group will progress the Higher Education Standards Panel's recommendations included in its report: [Improving the Transparency of Higher Education Admissions](#).

Question 8: How can data quality be improved for these elements?

Response:

Navitas supports proposals to improve the quality of the data within the Collection. Following are our views on the highlighted elements.

- 5.1 – Navitas supports reporting of the total tuition fee for international students once only, on commencement of the learner's course, including the amount of indicative fees for courses delivered by a third party. Further, Navitas supports the approach of linking PRISMS data to obtain this information directly without it having to be reported via HEIMS.
- 5.2 – In principle, Navitas agrees that the ability to note 'no information' for location codes makes the data set unreliable. However, there are many occasions when the student does not provide the required information, or it is inaccurate. Removing the 'no information' code will, in these circumstances, force providers to either spend resources chasing learners for this data which may well be unreliable in any event or there is potential that they may enter a valid – but incorrect – postcode in order to make the submission. Either scenario makes the data unreliable. Navitas suggests that an alternative approach is to maintain the 'no information' code, with the Department monitoring the use of this code. Those providers who are excessive users of the 'no information' option could be called to account for the quality of their data.
- 5.3 – Navitas supports the development of a consistent naming convention for course names and campus locations. We would also suggest that there is the opportunity to apply this same consistency across all systems that capture this data, such as PRISMS, Tertiary Admission Centres, etc.
- 5.4 – Navitas agrees that the RPL/Credit Transfer elements are complex to report. Further, we note that the reporting relating to RPL/Credit Transfer currently requires significant administrative work due to the need to manually input data for each scenario. This issue is compounded by the fact that some codes are not recognised in HEIMS. For example, Element 566 does not always recognise the HEP codes entered even if they are taken directly from the HEIMSHelp HEP Code specifications.

Therefore, Navitas welcomes a review of the RPL/Credit Transfer processes and a communication plan so that they can be consistently applied by all providers. We also believe the proposal to adopt a USI as a single unique identifier across both VET and higher education will enable the tracking of a learner's post-school educational journey throughout their life.

- 5.5 – Navitas agrees that participation, as well as attainment, is an important element to record and welcomes additional opportunity to report this. It is expected that, to record participation, including recognition of award hierarchy, will require additional codes to be reported.

Such additions will require changes in our student management systems and admissions/student servicing processes. Again, we request that consideration be made of the timeline for institutions

to implement the changes and that the Department consults with providers on the changes so they can be correctly applied.

- 5.6 – Navitas supports the increased transparency and accessibility of provider information so prospective learners know what to expect from the course of study they are undertaking. A standardisation of information relating to campuses and courses is welcomed but would be best if published centrally and data not be requested repeatedly for the same purpose. Therefore, Navitas supports the incorporation of this data within the Admissions Information Platform as recommended by the Higher Education Standards Panel (HESP).

Question 9: Is there value in maintaining the ATAR in the Applications and Offers submissions when it is also collected in the student enrolment data?

Response:

Navitas supports measures that see the same information collected once and used often. Therefore, our view is that an ATAR score should not continue to be collected as part of the Application and Offers submissions when it is already collected in the student enrolment data.

This is however, a narrow perspective on a wider issue: one which relates to the work undertaken on behalf of the HESP into the transparency of higher education admissions. Navitas, as a provider that serves a diverse, and often non-traditional learner cohort, believes that the data on how a learner is admitted to a higher education qualification should be broader than simply the Australian Tertiary Admission Rank. The HESP's October 2016 report on admission transparency states that in 2014, more than half of the students admitted to higher education courses were accepted on the basis of previous vocational or higher education study, mature age entry special provisions and the like. Only 44 percent of learners were admitted on the basis of their secondary education attainment – and of these only 70 per cent were selected on the basis of their ATAR.

Navitas would therefore suggest that the Department look to the work of the Admissions Transparency Working Group and work with the sector to ensure the agreed categories – that reflect the breadth of admission criteria considered by providers – are included in the student enrolment data collection.

Question 10: Are there other elements where a lack of clarity impacts on data quality and usability?

Response:

There are two additional matters that Navitas wishes to raise in relation to data quality and usability. First, Navitas believes that there are a significant number of data elements that could benefit from the availability of additional helpdesk-style support and a Frequently Asked Questions (FAQ) section. Navitas suggests that as part of the Redevelopment and Audit of the Higher Education Data Collection project that the Department invite providers to submit queries for each element and that a brief FAQ be developed for each issue.

Second, Navitas recommends that an amendment be made so that reporting staff Full Time Equivalent (FTE) be up to 2.0. This would ensure that student Equivalent Full Time Student Load (EFTSL) and staff FTE can be reported at equivalent levels. This is important as it avoids distortion and misreporting of student to staff ratios for providers who teach outside the traditional two semester per annum university model.

Question 11: Other important issues for consideration

Navitas would also like to raise a number of important issues that do not relate directly to the focus questions in the discussion paper that are nonetheless central to the project of redeveloping and auditing higher education data collection.

First, Navitas believes that this project provides an opportunity to vastly improve the timeliness of the release of data. The discussion paper states that as a result of single touch reporting 'student data would be available up to six months earlier' and that 'full year data would be available for end users at least four months earlier – around March instead of the end of June or later'.

Navitas notes that 2016 uCube data was not made available until mid-November 2017. Navitas believes that the Department should move to a monthly or quarterly year-to-date data release. There would obviously be caveats around the accuracy of the data until it was final. However, there are precedents for this with other government data sets, such as the international student enrolment and commencement data and the Australian Bureau of Statistics estimates of exports for example.

Second, and again this relates to accessibility of data, Navitas strongly advocates for consideration to be given to making more data publicly available – beyond providers. The wealth of data provided by the higher education collection should be made available to researchers, academics, think tanks, consultants, citizens and learners to inform thinking, decision-making and choice. Higher education could look to the vocational education and training statistics – VOCSTATS – as a model. VOCSTATS provides data on Total VET Activity, government-funded programs, apprenticeships and traineeships. The categories are extensive and granular.

The timeliness of looking to expand access to government data was highlighted in a recent speech by the Hon Michael Keenan MP, the Minister for Human Services and Minister Assisting the Prime Minister for Digital Transformation. In his speech to the Indonesia-Australia Digital Forum, Mr Keenan outlined an expanded emphasis on data policy, both through the increased use of data analytics across the silos of government, as well as an accelerating program of making data sets available to the private sector.¹

Finally, Navitas would like to highlight, in the context of the soon-to-be-implemented changes to the Privacy Act, that the government must work across agencies and with providers to ensure that providers are able to maintain their responsibilities under the reportable data breach provisions. The sector takes its responsibilities very seriously and while the advent of single touch reporting, USIs and the like, brings benefits and opportunities, there are also risks of unintended data breaches as machines and systems take on a greater role in data collection, storage and re-distribution.

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¹ <http://www.innovationaus.com/2018/02/Keenan-on-the-DTA-challenge>