

## Review of the National VET Provider Collection Data Requirements Policy

### SUBMISSION

### NAME OF ORGANISATION OR INDIVIDUAL MAKING SUBMISSION

Navitas Limited

### AREAS FOR RESPONSE

#### Term of Reference One

**The extent to which current administration and implementation arrangements of the Policy are contributing to its intended outcomes and results.**

Questions for consideration – supporting the collection and use of data that **increases understanding of the national VET market.**

1. How well do the arrangements for data collection help achieve the objectives set out in the Policy? (Increase **efficiency and transparency of the VET sector**, to support **understanding of Australia's VET market** and **management of the national training system**).
2. How well do the arrangements for data use set out in the Protocol help achieve the objectives set out in the Policy?
3. Is the right data being collected and reported to meet your needs? If not, what alternative data would benefit your organisation?
4. Does the Data Policy provide sufficient guidance on the administration or implementation of its provisions? What – if any – are the concerns?
5. Can you identify tangible benefits for your organisation from the current Data Policy? What are they? Could further benefits be realised through improvements to the Data Policy? What would these be?

Navitas supports the stated objectives of the National VET provider data collection, those being to:

- Increase the transparency and efficiency of the VET sector; and
- Support understanding of Australia's VET market and management of the national training system.

Current arrangements enable macro-level analysis on skills supply, trends in training delivery, and the impact of interventions in the VET market to inform government policy and also provide regulators with access to provider and sector level data with which to identify risks and prioritise regulatory activity.

However, current arrangements do not sufficiently meet the needs of providers seeking to identify opportunities to enhance innovation and quality and better understand the needs of learners and industry. It would be valuable to be able to access and compare key measures and demographic information (such as qualifications issued, units of competence completed, age, sex, indigenous status, and prior educational achievements) by provider, field and level of study via VOCSTATS.

In order to enable greater access to what the Prime Minister has referred to as a 'strategic national resource' Navitas believes this type of data should be made available to providers and other users such as researchers and think tanks in order to better analyse and benchmark market trends, market share and learner experience and outcomes. As Navitas has stated in previous submissions to government (such as the Redesign of VET FEE-HELP) this type of data, made easily accessible, also enables learners, parents and employers to make more informed skills and training decisions and investments.

Related to the above points, Navitas also recommends the following additional functionality for VOCSTATS:

- Any authorised staff member (Organisational User) should be able to log into VOCSTATS and easily access the current range of standardised reports containing aggregate national data but also allowing the user to select fields showing the provider-level performance of our own RTOs, benchmarked against other RTOs.

- 'Private Folder' functionality of VOCSTATS should be extended to allow any authorised Organisational Users to create and save tables to an 'Organisation' folder so that any other Organisational Users could also view saved tables in that dedicated folder.

Navitas acknowledges the issues with the publication of 'raw' completion data and understands why this data is no longer available on the MySkills website. However, we do still see value in the publication of this data, with the addition of the reasons why learners in a particular cohort have not completed a full qualification, along with the percentage these represent, such as: changed their enrolment status to be part-time; commenced employment; gained promotion; suffered ill health; experienced an increase in their work commitments; experienced an increase in their family commitments; enrolled in a different program; etc. Consideration should also be given to publishing not only qualification completions, but also completions by units of competence.

Finally, Navitas recommends a change to the period that a 'completion' is recorded. In order to more accurately reflect the reality of the time it takes for learners, particularly mature and part-time learners, to complete a qualification Navitas advocates for the collection period for individual learners to complete a qualification be extended from two years to three years. This is because many learners take up to three years to complete a one-year full-time qualification due to family, work and other commitments.

## Term of Reference Two

### **The effectiveness and suitability of current reporting timeframes and processes for data submitters and the users of VET data.**

Questions for consideration – The extent to which current procedures and frequencies for submitting data enable efficient collection and reporting of VET data.

6. How can the current procedures and processes for collecting and submitting AVETMISS compliant data be made more effective and efficient for RTOs and other relevant stakeholders?
7. Are there any data quality assurance concerns, and if so, how could they be addressed?
8. What available technologies would provide simpler reporting options for data providers?
9. What concerns are created by variation in reporting processes or reporting frequencies/timeframes for different types of training activity? What changes to the Policy could address this?
10. What benefits are realised (or restricted) from the current reporting arrangements? How could these benefits be enhanced by changes to the Policy?
11. Would it be easier for RTOs if smaller amounts of event based data could be submitted more frequently?

#### **How can the current procedures and processes for collecting and submitting AVETMISS compliant data be made more effective and efficient for RTOs and other relevant stakeholders?**

Navitas notes that the absence of a national, sector-wide data framework covering both VET and HE data (e.g. AVETMISS and HEIMS) limits the usefulness of the collected data in terms of analysis of the 'whole' Australian tertiary sector.

The misalignment of data specifications between AVETMISS and HEIMS, and indeed state-based reporting systems, also creates significant inefficiencies in data collection and verification for dual sector providers, particularly when learners' progress from VET to higher education programs. For example:

- **Disability type identifiers** – AVETMISS requires Disability type to be reported as per the conventions published by the World Health Organisation (Geneva, 1980). HEIMS has different reporting requirements around Disability type which originates from the HE student data collection of 1996.
- **Address field identifiers** – AVETMISS has very detailed street v postal v international address field data reporting requirements which differ from the HEIMS street v postal v international address field data requirements.

Further, we agree that the current reporting arrangements – whereby RTOs submit AVETMISS compliant data either to NCVER and/or a state training authority (STA) and/or a Board of Studies at different times and frequencies – is unnecessarily complex. In particular, the difference between data fields and formats and reporting across databases (including HEIMS) creates a significant data administration burden.

Navitas therefore suggests that RTOs report all data, once through one entity/system. We understand from conversations with a Commonwealth Cabinet Minister in a related portfolio that a system that would enable such sharing of data / information is currently being developed through the Commonwealth Digital Transformation Office.

We would also strongly support the submission of data through 'system to system' transfer throughout the reporting period with specified dates for validation of submitted data, similar to the process used for HEIMS reporting which also allows providers to submit amendments to reported data (e.g. amendments to reported results data).

#### **Are there any data quality assurance concerns, and if so, how could they be addressed?**

As previously mentioned, the process used for submitting data to the HEIMS database followed by scheduled validation activities works well and seems to address data quality assurance concerns. It should be possible to also extend AVETMISS capabilities to enable providers to view

submitted data and monitor data quality held within the AVETMISS system (similar to HEIMS online).

**What benefits are realised (or restricted) from the current reporting arrangements?  
How could these benefits be enhanced by changes to the Policy?**

An example of the problems and benefits realised by current reporting arrangements is when RTOs report validated VET data on a monthly basis to more than one reporting entity; i.e. multiple state government Departments of Education and Training. These state based authorities then report every six months to the Commonwealth Department of Education.

It would be far preferable, as outlined above, to report to a single entity and they support either monthly reporting and/or system-to-system data transfer throughout the period with regularly scheduled validation activities because:

- More frequent data validation results in more accurate data and fewer funding issues;
- Scheduled reporting and validation allows data administration activities to be managed around other student administration activities; and
- The data reporting cycle enhances operational performance and efficiencies.

**Would it be easier for RTOs if smaller amounts of event based data could be submitted more frequently?**

It may be the case that an RTO would prefer to have the option to submit event-based data as this may suit their diverse delivery models (e.g. enterprise based fee-for-service delivery over varying periods; and rolling intake into programs with varying end-dates). To that end the ability to submit events based data more frequently would be welcome.

**Term of Reference Three**

**The effectiveness, suitability and impact of all current (and any proposed) exemptions for collecting and reporting Total VET activity (TVA) and Unique Student Identifier (USI) data.**

Questions for consideration - The impact of exemptions on stakeholders and the data collection.

12. How relevant (and important) are the current reporting exemptions for data collectors and data users?
13. What case can be made for removing or modifying any of the current exemptions?
14. What case can be made for adding new exemptions?
15. What are the arguments for retaining reduced demographic data reporting for short courses?  
Beyond course duration, what other criteria could be used, and how should eligibility be verified?
16. Are you satisfied that the current exemptions are already providing an appropriate balance between reporting requirements for students/training providers and the value of the data being collected? If not, what changes do you suggest, and why?

Navitas' view is that for this data to be as valuable as it possibly can be it should be as complete as it can possibly be. Therefore, exemptions to reporting should be rare, specific and only upheld where there is a pressing need to do so.

#### **Term of Reference Four**

**The extent to which the current suite of documents provide clear and concise advice to all stakeholders on the collection, reporting, storage and disclosure of VET data, consistent with the need to provide as much information as possible to stakeholders whilst ensuring appropriate privacy protections are maintained.**

Questions for consideration – Providing clarity and understanding of responsibilities for disclosing and accessing VET data, to support transparency and publication of information.

17. How clear and easy to follow are the Policy and Protocol?
18. How could guidance on the use of VET data be clarified or simplified?
19. How well do users understand their responsibilities and authority for collecting, reporting, storing, disclosing and accessing VET data, including identified data?
20. How well do the Policy and Protocol support the collection and use of VET data according to the Australian Privacy Principles?
21. Are there benefits in combining the Policy and Protocol documents into one document?  
Or  
Is it better to keep the Policy and Protocol documents separate (given the former deals with data reporting whilst the latter deals with data access and disclosure)? What reasons are there for keeping them separate?

**How well do users understand their responsibilities and authority for collecting, reporting, storing, disclosing and accessing VET data, including identified data?**

Navitas commends the AVETMISS team for providing timely and helpful guidance on reporting requirements. We believe that most users understand their responsibilities and authority under this policy.

**How well do the Policy and Protocol support the collection and use of VET data according to the Australian Privacy Principles?**

Navitas believes that privacy responsibilities are generally well-understood.

**Term of Reference Five**

**Whether any changes to the *National Vocational Education and Training Regulator Act 2011* or *Student Identifiers Act 2014* would improve data regulation.**

Questions for consideration – Consistency between the Data Policy and Protocol and the NVETR Act and the Student Identifier Act.

22. How well does the Data Policy meet the requirements of the NVETR Act and the Student Identifier Act?
23. What changes, if any, to the NVETR Act or the Student Identifiers Act and related documentation would better support current VET data system users, or would help VET data users better understand their responsibilities and authority for collecting, reporting, storing, disclosing and accessing VET data?
24. Are you satisfied that the current legislation provides clarity in the overall requirements as they relate to your organisations? Do you see the possibility of legislative changes as unnecessary or potentially confusing?
25. If changes are to be made to one piece of legislation, what implications would there be for other legislation?

No response provided.

**Any other comments in response to the Terms of Reference may be provided here.**

Navitas suggests consideration be given to the following:

- Enhancements to the Unique Student Identifier (USI) system to allow for the collection and management of demographic data. This would allow learners to provide and/or update their own demographic data by logging into their account.
- By linking demographic data to the USI it might be possible to eliminate the need for the provision of 'reduced demographic data' for short courses. In this way a short-course learner would only have to provide demographic data once with their USI application. This would allow any learner providing a valid USI to an RTO to be exempt from providing demographic data again and only require demographic data to be updated in the system as required.

**Once you have completed this submission template, save it to your desktop and then upload it via the online submission portal.**

If you have any enquiries, please contact [VET-DataPolicy@education.gov.au](mailto:VET-DataPolicy@education.gov.au).