DIISRTE 2012 Higher Education Staff Data Collection Review

Response from
Australian Council for Private Education and Training (ACPET)

June 2012
Introduction

Established in 1992, the Australian Council for Private Education and Training (ACPET) is the national industry association for private providers of post-compulsory education and training. ACPET has 1,100 members nationally, delivering a full range of higher and vocational education and training (VET) and English language courses across all states and territories. ACPET has approximately 100 members delivering higher education throughout all Australian states.

Non self accrediting Higher Education Institutions (NSAIs) form a very diverse group of specialised institutions. ACPET’s members deliver qualifications in the fields of theology, business, information technology, natural therapies, hospitality, health, law, design, accounting, music and linguistics. Approximately half of Australia’s non self accrediting institutions are approved under the Higher Education Support Act 2003 as FEE HELP providers.

As the peak body for private providers, ACPET is committed to ensuring that its policies, products and services contribute to an inclusive tertiary education system.

ACPET’s Response to the DIIRSTE Staff Data Collection Review

General Remarks

ACPET believes that a consolidated approach to information collection is required in order to eliminate unnecessary data collection requirements and reduce duplication of data collection. Of particular importance will be the requirement that the Department of Innovation, Industry, Science, Research and Tertiary Education (DIISRTE) and the Tertiary Education and Quality Standards Agency (TEQSA) enter into an agreement by which data collected by one agency can be reviewed by the other. Any other outcome is not acceptable as it will place unnecessary burden on institutions.

Onerous data collection requirements divert institutions’ resources away from their core activity and raison d’être, which is to engage in academic advancement of both students and staff. ACPET is concerned that the Higher Education Staff Collection will not lead to a consolidation of data, but rather to an increased amount of data being requested from institutions.
ACPET’s Response to questions

Question 1: What do you or your organization use the Staff Data Collection for?

ACPET does not use staff data collected by the Commonwealth in a systematic manner. Research commissioned by ACPET will from time to time access this data.

Question 2: Does the current collection meet your needs or the needs of your organisation?

ACPET believes that current collection of staff data meets the needs of member organizations from a the point of view of fulfilling their regulatory requirements.

ACPET believes that data should only be collected with there is a clear use for collected data.

Question 4: Are there any issues for providers if the Staff Data Collection is expanded to include information on the main campus location of each academic staff and to include offshore staff?

The issue of converting qualifications gained in other countries to equivalent Australian qualifications is a big issue which needs to be considered separately, and before the collection of offshore staff data can be seriously considered. ACPET believes that gathering data on offshore staff, many/most of who have undertaken qualifications abroad will not be of use unless we have a system that can understand and recognize overseas qualifications.

Question 5: Are there any issues for providers to report additional information on staff qualifications?

Any extra reporting requires additional resources. ACPET does not support the reporting of additional data reporting for non university providers if there is not a clearly defined framework of how the data will be used to improve public policy.

Question 6: What are the issues in extending staff data reporting requirements to all private higher education providers?

ACPET takes this opportunity to raise concerns that those institutions that are not FEE HELP approved will be faced with significantly increased requirements to provide data under the proposed arrangements. ACPET impresses upon DIISRTE that these institutions will be moving from a regulatory environment in which they were required to provide limited data to an environment where data provision requirements will be much higher, and an additional burden.

ACPET contends that DIISRTE’s proposal will increase the administrative burden placed upon institutions.

Question 7: How can the university-specific data elements be revised to reflect the structures and practices in private higher education providers?
ACPET is concerned about the suggested approach of revising university-specific data elements, and applying them to the non university higher education sector. The two sectors are diverse in their educational objectives and backgrounds, and culture and management styles – to attempt to apply criteria relevant to universities to the private sector may hinder the flexibility, distinctiveness and innovativeness.

ACPET is concerned that an adaptation of university practice will become the baseline against which all institutions will be assessed relating to staff salary bands and classification. Non-university providers outnumber universities 3 to 1; accordingly regulatory judgements should not default to university practices as the baseline.

**Question 8: Is it possible for private higher education providers to report their staff under the current work level classifications? If not, what are the possible alternatives?**

As mentioned in our response to question 7, the university and private higher education sectors are different and diverse in their missions.

Private providers may, or may not, classify staff as the university sector currently does (Lecturer, Senior Lecturer, Associate Professor etc), and even if the equivalent titles are used, the job descriptions may differ. Where alternative classifications are used, there would be a broad range of classifications which are not parallel in duties, seniority or salary levels to university classifications, even among private providers.

In developing possible alternatives, DIISRTE would need to keep categories as open as possible, without assuming equivalents. Establishing equivalents would inevitably mean attempting to integrate classifications into one system, constraining the diversity that currently exists in the higher education sector.

Data fields must reflect the reality of practice; otherwise data collection will become an onerous exercise that does not have the capacity to inform policy.

**Question 9: Are there any issues for providers to apportion and report FTE weight to each activity undertaken by staff working in one organizational unit?**

Attempting to refine reporting measures for staff functions in order to better capture the teaching, research and other activities undertaken by staff, as suggested by DIISRTE, would inevitably require further resources to be allocated.

**Question 13: If so, how should their teaching and research efforts be measured and recorded?**

As stated previously in this submission, the inclusion of such type of information in the collection of staff data will create an additional burden for private providers, and divert institutions’ resources away from their core activity which is to engage in academic advancement of both students and staff. ACPET believes that reporting at this level of detail is superfluous to requirements.
Question 14: Should the data collection for both full-time and fractional full-time staff, and casual staff be consistent?
If so, is there a preference for a ‘point in time’ or an annual total?

Collecting detailed data of all casual staff may be difficult due to the temporary type of employment, which may vary greatly from one institution to another. There may be times when a large number of casual staff may be working in an institution, other times when it may appear as no casual staff are hired by that same institution.

Question 17: Is the proposed method of calculating FTE using actual earnings/annual salary feasible?

The current method used for converting casual hours to FTE appears to work well.

ACPET believes that the proposed alternative method of calculating the full-time equivalence for casual and contract staff based on an ‘actual earnings/annual salary’ method is not appropriate as it involves too many issues:

- discussion of salaries is a delicate issue pay should not be considered part of the public record).
- diversity in salaries between universities and private providers.
- there exists a difference in salaries for similar institutions.

ACPET is concerned that once data is collected relating to staff salary bands and classification, university practice will become the baseline against which all institutions will be assessed. Non university providers are delivering almost 10% of higher education qualifications in Australia. Data collection metrics must recognise this and not merely see non university providers as just an add on.

Question 18: How does your institution or organisation use the SSR? Is there a better measure than the SSR that meets the needs of your organisation?

ACPET members use student to staff ratio as one metric that is used to monitor of the quality of education being delivered. ACPET does caution DIISRTE about applying to much weight to this metric as the changes to the SSR from unit to unit, course to course and institution to institution will vary greatly depending on the field of study.

Question 22: What do you estimate would be the approximate cost for your institution of implementing the proposed changes?

ACPET has provided some general remarks at the beginning of this submission which outline the concerns it has in relation to the proposals for the collection of staff data.

ACPET believes that what DIISRTE is proposing goes beyond regulatory necessity.

ACPET is concerned that under the current proposals, high quality institutions will be required to direct additional resources to prepare for data collection, when such a level of data is not required for effective regulation of the sector.

ACPET is also concerned that there has not been enough analysis on the impact that increased data provision requirements will have on non self-accrediting institutions particularly non FEE HELP.
approved institutions. Under the proposed arrangements these institutions will be required to meet exceedingly higher data provision requirements; this will pose an increased administrative and financial impost on these institutions.

ACPET welcomes ongoing dialogue with DIISRTE so that we are able to fully convey how elements of the introduction of the 2012 Provider Information Request are being managed by ACPET members. Further we call on DIISRTE to have a flexible approach in its regulatory interactions with ACPET members during this transitional phase.

**ACPET contact**
Mr Ben Vivekanandan
National Manager, Policy and Research
ACPET National Office
Suite 101, Level 1, 126 Wellington Parade
East Melbourne VIC 3002
Ph: 03 9412 5912