

Review of the National VET Provider Collection Data Requirements Policy

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ACPET submission

Introduction

Established in 1992, ACPET is the national industry association for private providers of tertiary education and training in Australia. ACPET has around 1,000 members who deliver a range of vocational education and training (VET), higher education, and English language programs across all states and territories, as well as internationally.

ACPET's mission is to enhance quality and choice in Australian tertiary education and training. Its members include commercial and not-for-profit entities, community and industry providers and enterprise-based training organisations. ACPET works with governments, industries and other stakeholders to ensure VET, higher education, English language and international education programs are well targeted, accessible and delivered to a high standard.

The recent publication of the first reports on Total VET Activity (TVA) highlights the importance of obtaining a comprehensive understanding of VET delivery in Australia. That some 26.8 per cent of the workforce undertook training in 2015 demonstrates, for example, the depth and diversity of skills development across the country and the importance of fee-for-service activity¹.

At the same time, some of the data for the VET FEE-HELP program has been pivotal in highlighting some of the worst program design and implementation in the sector for decades. This data will, no doubt, inform new arrangements for the program in 2017.

The recent concerns with performance of VET FEE-HELP have highlighted that the level of information sharing across state, territory and Australian Government agencies has not been adequate. ACPET seeks legislative and other reforms that enable greater sharing of VET performance data across jurisdictions and agencies to assist the regulatory and other activities that seek to enhance the quality of the sector.

The analysis and publication of data is not only important in understanding the outputs and outcomes of the sector but also, increasingly, in informing student and industry provider choice. Accordingly, ACPET seeks reform of the National VET Provider Collection Data Requirements Policy (the Policy) to support greater consistency and transparency in data collection and presentation to enhance student choice.

The following advice is provided in relation to the Review's Terms of Reference.

Terms of Reference 1: The extent to which current administration and implementation arrangements of the Policy are contributing to its intended outcomes and results.

There have been significant changes in the VET governance and funding landscape over recent years. There have been increasingly national arrangements for the regulation of the sector along with the development of training products and services that provide for greater national consistency.

The move to a more contestable market for government-funded training has seen the development of a diverse network of public and private providers, many of whom are delivering services across a number of jurisdictions and a range of programs.

At the same time as states and territories have implemented contestable programs, in particular, there has been the development of more complex and diverse data reporting arrangements. There are a myriad of provider reporting arrangements and timeframes aligned to various program guidelines. It is also the case that providers are required to report government-funded and fee-for-service data to different agencies (although again, there are variations depending on the jurisdiction).

This adds to the complexity and cost of reporting and the risks of incomplete and inaccurate data reporting. With the introduction of the Unique Student Identifier it is time to streamline reporting arrangements with a single national repository for all data reporting to which the various government agencies and regulators have access. The current arrangements of submitting data to multiple agencies with data being 'passed on' to NCVET are no longer fit-for-purpose.

The failings of the VET FEE-HELP program and the significant community and stakeholder concern about the quality and integrity of the sector means there is also a need to re-consider arrangements that limit the sharing of data, and its analysis, amongst agencies and regulators. The current guidance to NCVET relating to the disclosure and publication of national VET administrative collections and surveys significantly restricts its ability to share identified provider data with Commonwealth and state and territory agencies². Indeed, restrictions on the publication of data have been tightened in recent years. The guidance needs to enable real time access by relevant agencies, with necessary safeguards in place to restrict the sharing of relevant commercial data with the market.

While government agencies and regulators need access to information on the performance of the sector, so too do students and industry to inform decisions around their choice of program and provider. While the current data requirements support regulatory and contract compliance activity (noting the issues above), it is less relevant to the needs of students, in particular.

It is noted, for example, while the Policy lists providing better information to students and industry to inform choices as an outcome³, the Vocational Education and Training (VET) Data Protocol (the Protocol) governs access by "the Commonwealth and state and territory governments, training providers, peak bodies, researchers and the general public"⁴.

There is no indication the Protocol is intended to support informed student choice and this is reflected in the significant inadequacies on the release, publication and presentation of data. The current arrangements do not adequately recognise, or support, the move to a VET system that is, and increasingly so, characterised by competition, contestability and user choice.

It is time for the publication of VET data that is meaningful to students, business and industry and the broader community. This means information on program outcomes and student and employer satisfaction (where relevant). The current aggregated data on these measures adds little to informing student choice or the broader market. The information available on various Australian and state and territory web sites is mostly descriptive.

It is also important to consider how the information is published. In an age of digital disruption, it is not reasonable to expect students to navigate complex government-centric web sites and reports. A student friendly solution involving interactive apps and web sites will be more effective. The approach taken in the higher education sector, including through the Quality Indicators for Learning and Teaching (QILT) initiative, provides guidance on a possible direction⁵.

The concerns about the publication of simplistic or limited measures like completion rates are acknowledged and shared. There is the risk of misinterpretation of data and manipulation of outcomes.

To address these concerns and provide meaningful data for students and others, a broader suite of measures need to be developed and reported at provider level. This could include student enrolments, in training, cancellations, course and module completions and employment and other outcomes, along with student satisfaction.

Noting some data limitations and the concerns that arise in relation to reporting fee-for-service activity, this approach could initially focus on government-funded activity with providers able to 'opt in' in regard to their fee-for-service activity.

Importantly, at the same time, there needs to be detailed consultations with providers and key stakeholders to better understand the issues relating to the publication of data at the provider level and to develop workable solutions.

Ultimately, transparent access to meaningful data is an important development for the sector.

Terms of Reference 2: The effectiveness and suitability of current reporting timeframes and processes for data submitters and the users of VET data.

As noted above, there are a range of reporting timeframes depending on program funding source and jurisdiction. For TVA there is annual reporting aligned to a specific reporting 'window'. These arrangements are based on historical developments rather than a contemporary approach to data management. They are no longer fit-for-purpose.

To address the complexity of reporting, and in conjunction with the single reporting repository proposed above, there needs to be the opportunity for real time reporting by providers. That is, subject to meeting minimum reporting timeframes, providers should be able to forward data at a time that best aligns to their other student enrolment and management processes.

This approach would also address some of the practical issues that arise with annual reporting, in particular, due to the lack of provider familiarity and loss of understanding that comes over time. It would also help address the issues that arise where providers cease operations without student data being submitted.

This approach would, of course, need to be accompanied by measures to enable the ready identification of individual programs. Given, for example, that VET FEE-HELP training activity cannot be readily distilled from the TVA data, measures to enable program identification should be a priority regardless.

Put simply, all providers should be able to submit data at any point in time, enabling NCVET to constantly update the status of training activity and keep program managers, policy makers, regulators and the market better informed.

Terms of Reference 3: 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.

Consultations with members did not indicate any significant issues with the current exemption arrangements. Some greater clarity of exemptions and ensuring alignment with USI exemptions were the only relevant matters identified.

Terms of Reference 4: 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.

As noted above the current documentation, and particularly the Protocol and guidance to NCVER, heavily prescribes the ability to share and publish data that would better assist program managers and regulators to monitor the overall performance of the sector and its providers. These limitations are inconsistent with the need to provide as much information as possible, as espoused in the Policy. There needs to be a review of the various documents to ensure consistency of intent and combine them into a single coherent package.

In reviewing these documents, there also needs to be a recognition that the data is not only to serve the needs of government program managers, policy makers and regulators. The data policy framework needs to also support the 4.5 million student enrolments annually through some 4,200 providers operating in a market characterised by competition, contestability and user choice⁶.

The recent issues with VET FEE-HELP and several state programs has caused significant harm to the sector, its quality providers and students. More than ever, there needs to be data sharing and reporting that enables quality issues to be more readily identified, shared with relevant agencies and acted upon in a timely manner. While the privacy protection issues are acknowledged, there must be a priority on supporting quality and informed choice.

The extent to which the current suite of documents provide clear and concise advice, to some extent, can only be determined by some testing of the accuracy and completeness of the data being submitted. While the typical reporting requirements for government-funded activity provide some assurance in this regard, for fee-for-service activity it is not clear there is the same level of assurance. Accordingly, it would be appropriate for the Policy to include stronger data quality assurance provisions.

Terms of Reference 5: Whether any changes to the National Vocational Education and Training Regulator Act 2011 or Student Identifiers Act 2014 would improve data regulation.

ACPET would support legislative or other reforms that would enable greater sharing of VET performance data across jurisdictions and agencies to assist in the regulatory or other activities that seek to enhance the quality of the sector.

References

¹ NCVET, <https://www.ncvet.edu.au/publications/publications/all-publications/2874>

² Department of Education and Training (DET), <https://docs.education.gov.au/documents/guidance-ncvet-disclosure-and-publication-national-vet-administrative-collections-and>

³ Standing Council on Tertiary Education, Skills and Employment, <https://docs.education.gov.au/node/37145>, p2

⁴ DET,

https://docs.education.gov.au/system/files/doc/other/vet_data_protocol_as_approved_by_scotese_feb2014-updated_july2015_final.pdf, p3

⁵ <https://www.gilt.edu.au/>

⁶ NCVET, *op cit*.