



THE UNIVERSITY OF
MELBOURNE



Redevelopment and Audit of the Higher Education Data Collection

Submission to public consultation

16 February, 2018

Executive Summary

The University of Melbourne welcomes the opportunity to respond to the Department of Education and Training's Discussion Paper, *Redevelopment and Audit of the Higher Education Data Collection*.

The Department is to be commended for its commitment to ongoing improvement in the collection of higher education student data. This data is highly valuable, playing a critical role in discussion on policy reform and informing strategic planning for Australia's universities.

The availability of quality data is especially important in the context of learning outcomes delivered by Australia's post-secondary education system, assisting universities to continually increase efficiency and lift productivity. Universities draw from this data in decision-making around course design and delivery, and in developing strategies to improve student engagement and experience. The student data collected by the Department of Education therefore underpins the teaching performance of the university sector.

In addition, this data is critical to supporting public confidence in our universities. Both students and the broader public make a sizeable investment in our higher education system, and are entitled to be confident that providers are delivering the outcomes intended in that investment. Data that is both reliable and timely is necessary to a transparent system whose performance is visible to all interested parties.

The University of Melbourne strongly supports changes to the collection of data that reduces administrative effort and enhances data quality. We are particularly pleased at the proposed development of a Unique Student Identifier that covers all higher education students. This promises to significantly enhance the quality of student data that in turn can assist understanding the student cohort and improving planning and efficient allocation of resources.

While the University is generally supportive of the direction set out in the Discussion Paper, we argue that some of the proposed changes to the Data Collection need further refining so that they achieve the intended aims.

We note also that there are areas where the Discussion Paper proposes further review of individual data elements. The University of Melbourne would welcome the opportunity to continue working with the Department on improvements across these areas.

For further information, or to discuss this submission, please contact Dr Julie Wells, Vice-Principal Policy and Projects at julie.wells@unimelb.edu.au or on (03) 8344 2639.

Summary of Key Points

1. Single touch reporting

The University of Melbourne:

- supports a review of the current method of reporting that aims to reduce administrative burden and the time lag in the publication of student data.
- supports an approach that treats initially entered data as 'provisional', allowing for it to be updated to reflect changes made prior to the census date.
- suggests that Higher Education Providers be supported in implementing significant changes to the Data Collection, in view of the disruption to business processes and systems.

2. Identifying students

The University of Melbourne:

- supports replacing the CHESSN with a Unique Student Identifier (USI) that captures all higher education students, rather than just Commonwealth Supported Students.
- supports the adoption of the long-term aim of linking the USI with the unique identifier used by the ATO to support the evidence base relating to graduate outcomes and to improve transparency in the higher education system.
- supports the Department examining the possibility of adopting a unique identifier that applies to all tertiary students.

3. Reducing duplication

The University of Melbourne:

- supports the discontinuation of data being reported to the Department of Human Services, assuming that students are not thereby disadvantaged.

4. Relevance

The University of Melbourne:

- supports the removal of elements from the Collection that are either no longer required or have been duplicated.
- supports reviewing the ongoing need for the Campus submission, given that the *MyUniversity* website was decommissioned some time ago.
- supports expanding the Collection to better identify Work Integrated Learning (WIL).
- supports consolidating some of the smaller submissions into a single file to reduce duplication.

5. Low quality data

The University of Melbourne:

- opposes the proposed removal of 'no information' location codes.
- supports the removal of Overseas student fee data from the Student Data Collection, as this is already reported to the Department via PRIMIS.
- supports the proposed development of clearly articulated, agreed standards for reporting of course and campus names.
- supports the proposed review of:
 - data elements relating to credit transfer
 - data elements relating to prior higher education participation; and
 - the ongoing need to provide a campus submission.
- supports maintaining ATAR in the Applications and Offers submissions, but removing it from the Student Data Collection.

Response to Consultation Questions

1. Single Touch Reporting

How might we implement single touch reporting?

The University of Melbourne welcomes a review of the current method of reporting, and notes the commitment to reducing the administrative costs and the lengthy time lag in the publication of the student data.

The implementation of single touch reporting is a good policy objective. To ensure that this is successful, a number of issues will need to be addressed:

- If a daily upload of data to HEIMS is to occur, this data should be treated as ‘provisional’, with a deadline for the institution to provide final sign-off (i.e. post census date). Data initially entered is subject to change as students have up until the census date to enrol in or withdraw from units of study and to provide a valid Commonwealth Assistance Form. Their enrolment status will therefore not be confirmed until this date, and student status code (E490) will not be finalised until just after this date.
- There are other data fields that are currently “tidied up” prior to a final submission. The additional time needed for this to occur must be allowed for in any move to single touch reporting.

There are also questions relating to the administrative costs entailed in the proposed change. The implementation of a new collection methodology will inevitably require significant changes to business processes and university systems. It is not clear from the Discussion Paper what support, if any, the Department will provide to assist Higher Education Providers to make this transition. Consideration should be given to financial assistance to resource the implementation of the changes, which would include the required software updates to systems.

Key points:

The University of Melbourne:

- supports a review of the current method of reporting that aims to reduce administrative burden and the time lag in the publication of student data.
- supports an approach that treats initially entered data as ‘provisional’, allowing for it to be updated to reflect changes made prior to the census date.
- suggests that Higher Education Providers be supported in implementing significant changes to the Data Collection, in view of the disruption to business processes and systems.

2. Identifying students

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

We support the proposal to replace the CHESSN with a new ‘Unique Student Identifier’ (USI) that captures all higher education students rather than Commonwealth supported students only. The potential benefits to this change are considerable. The proposed USI would improve data quality and contribute to a stronger knowledge base for understanding student behavior. For example, this data could improve our understanding of attrition and retention and of the pathways taken by students throughout their studies.

A key question relates to the point at which the unique identifier is to be assigned. Presumably, this identifier would need to be assigned at the point of application (i.e. by the Tertiary Admissions Centre), since under the current arrangements it is expected that all applicants for Commonwealth Supported Places in the Applications and Offers (A&O) submission will be reported with a CHESSN. Arrangements would also be required for students who do not apply through a TAC.

The University of Melbourne also supports better integration of higher education data with that of other government departments. We believe that the Department should adopt the long-term aim of linking the USI in higher education with the identifier used by the Australian Tax Office (i.e. the tax file number). This would significantly improve the evidence base relating to graduate outcomes, thereby improving transparency and strategic planning.

The use of separate identifiers for VET and higher education students is a further problem that inhibits our understanding of student behaviour and in some cases, presents a barrier to a more seamless tertiary education system. The Department should examine the possibility of a unique identifier that applies to all tertiary students (i.e. both higher education and VET students).

Key points

The University of Melbourne:

- supports replacing the CHESSN with a Unique Student Identifier (USI) that captures all higher education students, rather than just Commonwealth Supported Students.
- supports the adoption of the long-term aim of linking the USI with the unique identifier used by the ATO to support the evidence base relating to graduate outcomes and to improve transparency in the higher education system.
- supports the Department examining the possibility of adopting a unique identifier that applies to all tertiary students.

3. Reducing duplication

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

The University of Melbourne supports the discontinuation of the weekly Centrelink 'CART' reported to the Department of Human Services, if the required information can be reported via single touch reporting and that there is no disadvantage to students. It is important, for example, that the data sharing between the DET and DHS is regular, and that students who become ineligible for support payments due to insufficient load are identified quickly and do not accrue large debts.

Key point

The University of Melbourne:

- supports the discontinuation of data being reported to the Department of Human Services, assuming that students are not thereby disadvantaged.

4. Relevance

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

The University of Melbourne supports the proposal to remove elements from the Collection, to the extent that these elements that are either no longer required or have been duplicated.

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

The University of Melbourne supports reviewing the ongoing need for the Campus submission, given that the *MyUniversity* website was decommissioned some time ago. It appears that information reported in the Campus file is being captured in other ways.

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

The University of Melbourne supports expanding the Collection to better identify WIL, in view of its growing importance. However, it will be important to minimise any administrative costs. As per the

Universities Australia (UA) submission to this consultation, consideration should be given to making use of the data elements that the UA collects through its WIL audits.

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

As has been suggested by other higher education providers, consideration should be given to consolidating a number of the presently required submissions (e.g. the course completions file) into a single file. This approach would reduce duplication and streamline submissions.

Another suggestion has been to consolidate all HELP files (SA-HELP, OS-HELP and HELP Due) into the one file. This too promises to reduce duplication and the number of submissions.

Key points

The University of Melbourne:

- supports the removal of elements from the Collection that are either no longer required or have been duplicated.
- supports reviewing the ongoing need for the Campus submission, given that the *MyUniversity* website was decommissioned some time ago.
- supports expanding the Collection to better identify Work Integrated Learning (WIL).
- supports consolidating some of the smaller submissions into a single file to reduce duplication.

5. Low quality data

How can data quality be improved for these elements?

Overseas student fees

As this information is already being reported to the Department of Education and Training via PRISMS, we support its removal from the Student Data Collection to reduce duplication.

Misreporting “no information” location codes

The University of Melbourne **does not** support the removal of “no information” codes. There are occasions where we are unable to obtain address details for a student. The only (acceptable) option in such cases is to report “no information”.

Importantly, were this code to be removed, HEPs would need to find some other way of populating the field in those cases where the student’s address has not been obtained. It is likely that they would simply report the relevant campus postcode. This would undermine the quality of the data and therefore its use for analytic purposes.

Course and campus names

The University of Melbourne supports the proposed development of ‘clearly articulated, agreed standards for reporting of course and campus names’, and increasing the length of these data elements to enhance data quality.

Credit transfer arrangements

The University of Melbourne supports a review of these elements and the provision of clearer coding notes.

Highest participation prior to commencement

The University of Melbourne supports the proposed review of this element.

Campus submission

The University of Melbourne supports the proposal to review current data elements, as well as a review of the ongoing need to provide a Campus submission.

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

The University of Melbourne supports maintaining ATAR in the Applications and Offers submissions, but removing it from the Student Data Collection. This would generate a better outcome by allowing the Department to collect the ATAR for students who apply but do not take up a place, and who therefore do not appear in the student enrolment submission. If the proposed USI is to be used in both the Student Data Collection and the Applications and Offers submission, then this would enable ATAR data to be matched with records in the student data.

Key points

The University of Melbourne:

- opposes the proposed removal of 'no information' location codes.
- supports the removal of Overseas student fee data from the Student Data Collection, as this is already reported to the Department via PRIMS.
- supports the proposed development of clearly articulated, agreed standards for reporting of course and campus names.
- supports the proposed review of:
 - data elements relating to credit transfer;
 - data elements relating to prior higher education participation; and
 - the ongoing need to provide a campus submission.
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