



Australian Government

Tertiary Education Quality and Standards Agency

Integrating the Provider Information Request into the Higher Education Data Collection

Consultation Summary Paper

February 2020

TEQSA

Definitions

TEQSA	Tertiary Education Quality and Standards Agency
DESE	Australian Government Department of Education, Skills and Employment
TCSI	Transforming the Collection of Student Information
SA	Australian Government Services Australia (previously Department of Human Services)
B2G API	Business-to-Government Application Programming Interface
SMS	Student Management Solution
PIR	Provider Information Request
“Flat File”	Interchangeable with ‘Packet’; refers to a submission file in the context of the Portal submission method.
Packet	Interchangeable with ‘Flat File’; refers to a submission file in the context of the B2G API submission method.
USI	Unique Student Identifier (E584)
HEIMS	Higher Education Information Management System
HEDC	Higher Education Data Collection
“the TEQSA Act”	<i>Tertiary Education Quality and Standards Agency Act 2011</i>
“the HESA Act”	<i>Higher Education Support Act 2003</i>
“the Privacy Act”	<i>Privacy Act 1998</i>
ASD	Australian Government Australian Signals Directorate
RAF	Risk Assessment Framework
HEPCAT	Higher Education Provider Client Assistance Tool
HEIMS-HELP	heimshelp.education.gov.au

Revision History

Version Number	Date	Author(s)
0.4	10.02.2020	Timothy Howard (IM Program Officer, Policy and Analysis, TEQSA); Greg Simmons (Director, Policy and Analysis, TEQSA); Jeremy Ong (Assistant Director Policy, Policy and Analysis, TEQSA)
0.3	07.02.2020	Timothy Howard (IM Program Officer, Policy and Analysis, TEQSA)
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Summary of consultation

Background

On 29 July 2019, the Tertiary Education Quality and Standards Agency ('TEQSA') released the *Integrating the Provider Information Request into the Higher Education Data Collection* consultation paper, that sought to request feedback from the higher education sector concerning the minimising and streamlining of reporting requirements, and improving the transparency and efficiency of data collected. The consultations were in preparation for the implementation of the Department of Education, Skills and Employment ('DESE') data redevelopment project, *Transforming the Collection of Student Information* ('TCSI'), that aims to align TEQSA and DESE data collections to create a single, unified reporting system for universities, higher education and vocational institutions.

The sector responded enthusiastically to the paper, with six (6) submissions received and a robust presence on social media during the submission period, which concluded on 20 September 2019. TEQSA, in conjunction with our colleagues at the DESE, considered these submissions alongside additional feedback stemming from workshops in Melbourne (12 November 2019) and Sydney (15 November 2019) that were ran in conjunction with the DESE and Services Australia (previously Department of Human Services, 'SA'). TEQSA has attempted to integrate the suggestions and concerns generated during the consultation into its final data framework.

Response to changes

Reporting process

TEQSA proposed two submission pathways to reduce transitional burden upon providers – the business-to-government API ('B2G API'), permitting a student management solution ('SMS') to directly query and transmit data with DESE data infrastructure, and the Provider Portal ('the Portal'), permitting a flat file data submission. The sector supports the overall intent of the TCSI data redevelopment project and its premise of a single reporting process for universities, higher education and vocational institutions. Whilst many providers saw the benefits of introducing the B2G API, the sector endorsed the continued ability to report data via a flat file.

Providers raised concerns regarding the costs of transitioning to B2G API reporting and pre-submission validation procedures. TEQSA assured continuing support of the Portal, whilst emphasising that a transition to B2G API reporting was optional. Moreover, providers attending the Melbourne and Sydney workshops saw a preview of the Portal and data validation procedures. Providers accepted TEQSA's responses, and TEQSA provided the assurance that it would continue to work closely with the sector to support and rectify any concerns providers raise during the transition period.

Data scope and TCSI alignment

TEQSA's proposal sought to minimise compliance burden whilst expanding and consolidating the data scope to ensure the Provider Information Request ('PIR') is fully compliant with TCSI. This involved expanding the submission from five (5) to ten (10) flat files/packets to maintain referential integrity and consistency with TCSI, allowing for the streamlining and aligning of TEQSA and DESE data collections. TEQSA in conjunction with the DESE revised the attributes of data elements to improve data quality, which involved an expansion of the data scope, ensuring compliance across TEQSA and DESE datasets.

The sector responded positively to the proposed data scope and schematic, with a few reservations in regards to increased reporting obligations and the privacy implications of new data elements. TEQSA designed the proposed data scope and schematic to minimise the quantity of new data elements whilst ensuring the PIR collection is compliant with TCSI. The additional data elements targeting equity (e.g. E347, E348, E572, etc.) – that some providers queried whether necessary – ensure alignment with the TCSI framework whilst improving the quality of equity-based data analysis across the higher education sector. The proposed PIR collection also ensures support of any future use of the Unique Student Identifier ('USI', E584) within Higher Education.

Submission period alignment

The paper proposed a move of the PIR submission period from its current August submission window to March, to allow for earlier availability of full-year verified student data. This proposal also automated many currently manual processes by verifying Higher Education Information Management System ('HEIMS') and PIR data concurrently, streamlining two processes into one, thereby allowing the higher education data collection ('HEDC') to become more efficient. Moreover, it would allow for TEQSA to better plan cyclical regulatory activities and assessments, providing more certainty around the timing of data availability, in turn ensuring the accuracy of assessment outcomes.

The sector indicated concern with a March submission period, due to a short transition period and that month being a busy month on campus. In response to feedback, TEQSA has implemented a staged transition period by delaying the implementation of a revised data scope and TCSI reporting until 2021, and aligning the reporting dates for PIR and HEIMS for 2020. The 2020 collection will continue to utilise the existing PIR data scope and schematic, although the student and courses collection will now conclude at the end of April. Moreover, TEQSA will continue to work closely with the sector to ensure any issues that arise during the transition period are rectified and that discretion regarding reporting non-compliance is considered whilst providers learn the system.

Data security, integrity and privacy

TEQSA proposed that whilst data under both the *Tertiary Education Quality and Standards Agency Act 2011* ('the TEQSA Act') and/or the *Higher Education Support Act 2003* ('the HESA Act') would be stored together within the DESE data repository, access to TEQSA-legislated data would continue to be limited to TEQSA officers for the purposes of the agency's regulatory functions. TEQSA also noted that it would

undertake a review to ensure adequate safeguards are in place to protect personal information against requirements contained within the *Privacy Act 1988* ('the Privacy Act'), the *Privacy (Australian Government Agencies – Governance) APP Code 2017* and the *Guidelines for Federal and ACT Government World Wide Websites*, as issued by the Privacy Commissioner. The Australian Signals Directorate ('ASD') certifies the DESE data repository, ensuring approval for Commonwealth Government use alongside regular audits by the relevant agencies to ensure maintenance of data security and integrity.

The sector indicated support of the proposed data security and privacy provisions. Providers also indicated that a boilerplate privacy statement would prove helpful in informing students of why any personal data is collected and how TEQSA uses that data, especially in the case of the USI (E584). TEQSA will consider this feedback as DESE rolls out the USI. TEQSA will also continuously review developments of the roll out to ensure adequate safeguards are in place to protect personal information against relevant requirements contained in the sources identified above, and to ensure it complies with its *Complete Australian Privacy Principles Privacy Policy and Privacy Management Plan*.

Additional requests

Providers submitted a number of requests on notice during the consultation period:

- a provider requested implementation of a provision to report 'no data available' against optional elements. This request will be consulted on with the DSD and DHS
- a provider requested broadening *E660 Delivery location – country code* to account for other delivery models. This request will be consulted on with the DSD and DHS
- a provider requested investigating an expansion of the B2G API to include Staff data. This is not currently untenable as staff data generally sits within a payroll system that would need to be modified by the solution provider to comply with any proposed TCSI specification
- a provider requested transparent specifications of any derived data elements. These will be supplied alongside the final data specification and scope documentation
- a provider queried the release date of risk assessments. Risk assessments will be released earlier utilising data from the same year, upon the rollout of TCSI. More details will be available as the *Risk Assessment Framework* ('RAF') project progresses
- a provider lamented the retirement of "the most felicitous term in the Australian higher education glossary", Higher Education Provider Client Assistance Tool ('HEPCAT'). Whilst the TCSI has bolted, TEQSA too hopes to see it in circulation again one day in a new context.

Next steps

In response to feedback received through this consultation, TEQSA is extending the transition period by postponing the implementation of the new TCSI data framework to the 2021 PIR.

TEQSA will soon notify providers of the upcoming 2020 PIR, which will continue to utilise HEPCAT and the existing data specification, but has brought the submission window forward to align with HEIMS (please refer to *Submission Schedule* document).

From 2021 TEQSA will require providers to report against the revised TCSI aligned data set utilising either the TCSI reporting portal or via the TCSI API. TEQSA has released a *Data Schematic* and *Data Specifications* document alongside this summary paper, specifying the format of the PIR for the 2021.

TEQSA and the DESE are preparing a series of webinars to assist providers with the transition to TCSI which will occur in the first half of 2020, in addition to the documentation available on the HEIMS-HELP website (see *Definitions* section). TEQSA will continue to consult and work closely with the sector to rectify any issues that arise during the transition period.

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