VET Student Archive - Focus group discussions

Method

Five focus groups involving RTOs were held in October 2006. Participants were invited via the online survey, the ACPET newsletter and memos sent to RTOs advising them of the consultation. The first four sessions were held in the Treasury Precinct and the last one was held at Northern Metropolitan Regional Council of Adult, Community and Further Education. In all 70 people from a range of providers attended the focus group discussions.

Focus group findings

The findings from the focus groups, like the findings from the online survey and the 2004 NCVER study, indicate that:

• few RTOs, apart from the large public institutions, can guarantee their records would be retrievable in 30 years time.
• there is support, particularly among the smaller RTOs, for the proposed VET Student Archive
• there is support for the archive to extract data from the Department of Education and Training portfolio’s existing data collections, rather than to create a new data collection process.

In the focus group sessions opinions were sought around four principles for the proposed archive, detailed below.

Principle 1 - Students should have life-long access to their credentials in vocational education

All RTOs agreed that students should have life-long access to their credentials and that a central archive would ensure students’ past learning achievements will always be retrievable. An archive will assist in enabling students to build on, rather than repeat, learning already achieved.

Students should have access to their learning for life and this would be a good way to ensure it.

Providers agreed that the 30 year archiving requirement is onerous, in that many RTOs would not be in operation for that long. Some participants questioned whether the AQTF requirement is reasonable given it is a considerable burden for an RTO and Units of Competency lose their currency over time.

Most RTOs already submitting their data to OTTE or the VCAA were supportive of the VET Student Archive proposal. RTOs who deliver only fee-for-service training were also supportive and expressed their willingness to submit their data, with a couple of caveats and suggestions for incentives:

If we submit data to the archive it should mean we have satisfied the 30 year archive requirement.
It needs to be easy, and perhaps this should be something where if we are still in business, we award the qualification, but if it is over, say, 10 years, students go to the VRQA and the VRQA awards it on our behalf?

Participants were mixed in their opinions on whether submitting student data to the archive on an annual basis should be compulsory or not. Some RTOs, who were very comfortable with both their student management systems and the likely continuation of their operations into the next 30 years, felt that introducing a requirement to submit data to the proposed archive would be an unnecessary burden.

How many RTOs go bust each year? Is this a big stick to punish the majority for a minority who don’t do their work properly?

Other RTOs, particularly smaller ones and those already submitting data to a central agency, suggested it should be compulsory, to ensure all students’ records are protected.

If an RTO can’t manage to submit a simple extract of their student records once a year, I wonder if they should be RTOs?

Many providers, particularly school RTOs, were enthusiastic about the idea of the archive linking with the Victorian Academic Number (VAN), and the opportunity this would present to enable students to access a comprehensive set of their learning achievements, from a number of providers and from different education and training sectors.

**Principle 2 - Privacy and confidentiality is a priority for both students and their providers**

All providers agreed that student achievement data belongs primarily to the student. They therefore agreed students should provide their consent for storage and retrieval of data from the archive, and accessing their results should require identity verification protocols.

Quite a number of RTOs suggested they would find it useful to access the central archive, (with the student’s permission), to validate previous results if the original RTO was not cooperating or had closed down. Technically, it is the student’s responsibility to track down their past results, but RTOs stated that sometimes they need to act on the student’s behalf.

Participants were asked their views about whether data from the archive could or should be used at an aggregate level, by the Government, and interested agencies, like ACPET, for statistical purposes. The majority of RTOs did not have a problem with this, as long as protocols to protect their students’ and their own privacy are implemented.

Privacy is important – the system should be designed to ensure it is secure and can’t be accessed by people for the wrong purposes.

Some providers were uncomfortable with the idea of submitting their student records data to a central government agency. For instance, one provider from a large industry RTO stated:

*Our company views our staff training as an asset – a commercial advantage belonging to the company, rather than the learning really belonging to the learner – hence we are reluctant to share student records with anyone, and we, as a company, would have to audit VQA/VRQA to check our stringent international privacy/security protocols are met. I take your point that the learning belongs to the learner, but our company believes the information*
belongs to us, and we would not want to risk it becoming available to a competitor.

Another organisation cited the example of students who are undercover policemen and whose identify is therefore carefully protected. Others observed that some students are unwilling to provide their date of birth even to the RTO – and without this identifying information it would not be feasible for the VQA, in the future, to re-issue a statement or certificate with confidence. RTOs agreed that students should be given the opportunity to opt-out of having their records being submitted to the archive.

A large proportion of RTOs providing only fee-for-service training were supportive of the proposal, and said they would like to submit their students’ records. However, when prompted, they agreed that appropriate protocols should be in place to protect any of their commercial-in-confidence data from competitors.

**Principle 3 - There will be no requirements for historical records**

A principle of the archive was that the VRQA would not expect RTOs to supply their student records from past years, but only from the year the system comes into operation. The purpose of this is to minimize the administrative burden for RTOs. Many RTOs agreed with this, observing it would be an enormous task to go back and reformat past data, in order to submit it.

However, many RTOs observed they would like to provide historical records so that they would not have to worry about keeping the data for 30 years. They suggested that it would not be difficult for them to achieve because their data is already, or could easily be changed to be, in the appropriate format. They also suggested this might be desirable so students have a more complete record of their learning stored in the archive.

**Principle 4 - AVETMISS standards will apply to keep the administrative burden to a minimum**

Many RTOs already submit data to a range of government agencies for different purposes, resulting in significant duplication of data entry. For example, if they receive funding from the State Government, they submit data to OTTE via the AVETMISS data collection process. If they are a school RTO, or deliver VCE or VCAL, they are obliged to enter student achievement in VET into VASS. If the students are undertaking traineeships, the data will be entered via DELTA. If the provider’s students are immigrants receiving Commonwealth funding, their learning achievements must be recorded on a database managed by the Federal Government called ARMS.

RTOs were therefore supportive of the proposal that the archive would take an annual extract from existing data collections like those collected by OTTE for AVETMISS purposes and the VCAA via VASS.

**You should definitely extract the data from the other data sources – we have too much data entry as it is.**

A finding from the focus groups was that there are currently inconsistencies in RTOs’ understanding of their reporting obligations, and current duplication of requirements from different agencies, which need to be addressed.

**Schools who are RTOs don’t enter all students into VASS – if they have students from another school, for instance, this data is stored on the RTO school’s Excel spreadsheet, and they assume, but don’t guarantee, that other schools enter the data on to VASS. Entering VET results on to VASS is time intensive, and a lot of**
Schools don’t bother entering all the VET results if the student has already satisfied completion requirements with their VCE and VCAL units.

I currently award units and qualifications for my own and another ACE provider’s students, but get the other ACE provider to report it to AVETMISS, if the students come from that provider.

A number of other issues with data integrity were also raised in the focus groups, including how errors would be corrected in the archive if a change was required after the cut-off date (this is quite common for TAFEs), suggesting some sort of process to ensure the archive is updated to reflect any changes made would be needed. Providers emphasised that such a process should be simple to administer.

Those RTOs that do not have appropriate software were generally supportive of the proposal but were understandably concerned about the financial implications of purchasing new software, and favoured a transition strategy if the submitting data to the archive were to become a condition of registration. Many of those using Excel and Access, however, expressed confidence that they could create an appropriate extract from their systems if they were supplied with the formatting specifications.

Discussion

The focus groups showed that most RTOs agree that there is a need for a central system for students’ records. However, RTOs emphasised that existing data collection processes should be used to populate the archive, rather than requesting them to send data to multiple government agencies.

To achieve this, and to ensure data integrity of the archive, existing reporting obligations to the various government agencies would need to be reviewed, documented and possibly revised where efficiencies can be identified. In addition, an effective communication strategy and professional development for RTOs would be needed to ensure RTOs are clear on their reporting obligations.

Many RTOs are enthusiastic about the possibilities of the proposed VET Student Records Archive, beyond its core role to protect students’ results in case of RTO closure. In particular, they suggested:

- RTOs who submit data to the archive should be deemed to be meeting their 30 year archiving requirement
- Students (and possibly providers) could contact the VRQA to access their results, rather than trying to contact the RTO. This would assist in recognising past achievements, to ensure learners are building on, rather than repeating, past learning.
- The VRQA could award statements and certificates on the RTO’s behalf, after an agreed time has passed (for example, if the learning was achieved 10 years ago)
- With the VAN, it should be possible to ‘join up’ a learner’s achievements from a range of providers and sectors, so learners could have a comprehensive set of their learning achievements

Consideration about these suggestions is needed. While the latter suggestion depends on successful implementation of the VAN, the others have implications for the VRQA in terms of additional workload and in ensuring the regulatory framework around the proposed archive is appropriate and effective.

Providers were mixed in their views on whether the archive should be compulsory — some RTOs believed it should be a condition of registration that student records be
passed to the archive; others felt that this would be inappropriate and would seek exemptions. It is clear that the provision of historical data should not be a requirement, but should be optional for those RTOs who wish to supply it in the appropriate format.

Privacy is a priority to protect both students and providers. Most providers, but not all, felt it would not be difficult to establish appropriate protocols to pass on student data to the archive without breaching their students’ rights. They emphasised that they would have high expectations of the VRQA to ensure that it, too, implements appropriate protocols to protect students’ and providers’ data.