

Submission

by the National Centre for Vocational Education Research (NCVER)

To

The Treasury

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The proposal to remake the Statistics Determination 1983

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The *Statistics Determination 1983* (the Determination) is due to sunset on 1 October 2018. The Determination needs to be remade so the Australian Bureau of Statistics (ABS) can continue to provide detailed statistical information that helps to inform policy making.

RESPONSE TO TERMS OF REFERENCE

The National Centre for Vocational Education Research (NCVER) is an independent not-for-profit company owned by the Commonwealth, state and territory ministers responsible for vocational education and training (VET). NCVER collects, manages, analyses, evaluates and communicates research and statistics about VET. In the context of the Statistics Determination Act, NCVER is classified as an 'organisation' rather than as a 'government agency' or 'entity'.

This submission provides support for the proposed changes to the Determination.

Background

NCVER has an interest in the proposed changes to the *Statistical Determination 1983*. NCVER is the data custodian, on behalf of the State and Territory and Commonwealth Governments, of the national VET administrative collections and surveys. We hold rich data that are used by us and other organisations for a range of purposes, and must also keep pace with changing legislative requirements and demand for government held information.

Access to data held by NCVER is governed by the National VET Data Policy, which came into effect on 1 January 2018. Part C of this policy deals with VET data access and disclosure (Department of Education and Training, 2017). This policy aims to allow open access to information unless there is a legal requirement to protect it. It applies to all past, current and future VET data collected and reported to NCVER, except where disclosure would contravene applicable legislation, including the *Student Identifiers Act 2014* and the *Privacy*

Act 1988, or breach any applicable agreement. The policy deals with published, unpublished and identifiable data about business who are RTOs. In much the same way as the ABS has a Disclosure Board, NCVER has a VET Data Access Committee (VDAC), to which complex matters are referred to provide non-binding advice on requests for access to unpublished identifiable data held by NCVER and the Student Identifiers Registrar. The principles under which the VDAC operates are similar to the five safe principles¹ adopted by the ABS (ABS 2017, Ritchie 2008). Researchers must complete a data request form to access data held by NCVER.

With the exception of the National Apprentice and Trainee Collection, which holds information on employers who have a training contract with an apprentice or trainee, NCVER data collections do not contain much information about businesses or employers, and therefore are reliant on the ABS when researching employer related VET issues. For example, the biennial Survey of Employer Use and Views of the VET System (SEUV) and a past research project looking at inter-firm cooperation in training (Cooney & Long, 2008) both relied on the ABS Business Register for their sample base. A number of other NCVER past research projects have utilised unit record data sourced from the ABS. For example Ball & Freeland (2001) sourced data from the ABS Business Longitudinal Survey to explore factors that affected the provision of entry-level training by enterprises. More recently, Snell et al (2016) used ABS Census and labour force data to look at challenges and opportunities for cross-occupational skills transferability.

NCVER frequently includes public ABS information in its media releases and publications, some of which may be affected by the Determination. For example, ABS population data are used to calculate the VET participation rates of Australians aged 15-64 years (NCVER, 2017). Also, the NCVER publication on young people (NCVER, 2018) includes ABS information on higher education participation by young people. Due to the intrinsic relationship between employment and apprenticeships/traineeships, NCVER realises benefit from contextual information drawn from ABS public information about employment trends, for example to help explain the background to the number of people taking up apprenticeships and traineeships (NCVER 2018).

NCVER supports a number of the proposed changes to improve access to data for policy makers, researchers and academics. NCVER support the proposed changes relating specifically to:

- a) release of information already available to the public
- b) release of a greater range of business characteristics (including the ABN) to a broader range of recipients in the form of a list of businesses, with the simplification of the current notification process
- d) greater access to de-identified data.

Further comments on the proposed changes that may affect NCVER are provided below, grouped under the changes set out in the consultation paper.

¹ The 'five safes' model is applied to all ABS data. This model prescribes that the project, the researchers, the setting, the data and the output should all be 'safe', in terms of appropriateness, security and privacy.

Proposed change a): Release of information already available to the public (Clause 3)

NCVER frequently includes ABS public information in releases and publications, and accordingly supports this proposed change, which would provide enhanced information and commentary to support NCVER statistical products.

In this context, NCVER statistical and research products can also be used by the ABS to add context and complement ABS statistical products where appropriate.

Proposed change b i): Release a greater range of business characteristics to a broader range of recipients in the form of a list of businesses (Clause 6)

NCVER is responsible for the management of the Survey of Employer Use and Views of the VET System (SEUV), a biennial survey conducted on behalf of the Australian Government Department of Education and Training. The survey was first conducted in its current form in 2005 and since that time has used the ABS Business Register (ABR) as the sample frame for the survey. The proposed change would involve releasing a greater range of business characteristics, such as the Australian Business Number (ABN) and whether the organisation is a multi-state unit. This would assist in the management of the Business Register list when it is released to NCVER to administer the SEUV.

This change also has the potential to reduce costs of administering the SEUV by increasing the sampling efficiency. Considerable time is spent by our fieldwork contractor cleaning the list once it is received from the ABS. Some of the contact information that is contained on the ABR is outdated. Allowing access to other widely available information such as an organisation's ABN would assist in searching for the organisation using other sources and ensuring we have the most up-to-date contact information. This would also reduce sample wastage of records that we are unable to contact, arising when searches are conducted using organisations' names and addresses supplied with the list, which may have changed. Sometimes slight name or address changes mean we are unable to ascertain if an organisation is the same as that on the list supplied by the ABS; being able to search using the ABN would reduce this.

Including the ABN on the list received from the ABR to administer the SEUV could also potentially be used to flag employers with apprentices and trainees through a matching exercise with data held in the Australian Government Department of Education and Training's Training and Youth Internet Management System (TYIMS)². This would reduce survey burden on employers known not to have apprentices or trainees by allowing questions to be more focussed and relevant.

NCVER has previously pursued including the ABN in the National Apprentice and Trainee Collection, which would have been used as a key with which to supplement information from the ABR and provide more information about what types of business have apprentices and trainees. However, the sharing of the ABN is not allowed for non-government bodies.

² TYIMS is the Australian Government's system for the administration of Australian Apprenticeships, including the processing and payment of incentive claims and storage of contracts of employment. It is in the process of being replaced by the Australian Apprentice Management System.

Proposed change b ii): Simplify the current notification process (Clause 6)

NCVER assume that the publication of the description of each list (not the details in the list) also means that there is no requirement to table a description of the list in Parliament. Accordingly, this could reduce the production timelines of the SEUV by 3-4 weeks, allowing faster release of survey results to the public.

Proposed change d ii) Access to an increased range of de-identified unit record level business information (Clause 7(1)(b))

NCVER, as a research organisation supports appropriate access to an increased range of de-identified unit record level business information to inform and influence VET policy and practice.

NCVER is committed to managing personal information, and 'sensitive' personal information, in an open and transparent way, including unit record level business information. In collecting, holding, using and disclosing personal information, NCVER is also bound by the Australian Privacy Principles (APPs) set out in Schedule 1 of the *Privacy Act 1988 (Cth)*³.

Following a review of the *National Vocational Education and Training Provider Collection Data Requirements Policy*, which outlines the data collection and submission requirements for total VET activity, Skills Ministers have agreed to a new *National VET Data Policy* (Department of Education and Training 2017). This policy took effect from 1 January 2018 with a six-month transition period until 1 July 2018.

NCVER will, under strict terms and conditions, allow access to files of VET unit records. This includes, but is not limited to, unit record data from the National Student Outcomes Survey, the Survey of Employers' Use and Views of the VET System, and the National VET Provider Collection. These files are confidentialised prior to being provided and are known as CURFs (confidentialised unit record files). To gain access to a CURF an application must be completed. Where disclosure of unit record data is authorised under the National VET Data Policy, such disclosure is made upon written application and a signed undertaking to protect the data according to the provisions of the *Privacy Act 1988*. Disclosure of student identifiers is made in accordance with the provisions of the *Student Identifiers Act 2014*⁴ and *Student Identifiers Regulation 2014*⁵.

Enhanced availability, in appropriate circumstances, of unit record data under the proposed change to the Determination could facilitate greater VET data linkage and analysis opportunities (Osborne et al. 2018). This has the potential to provide valuable multifaceted insights for policy and further research.

Summary

In summary, NCVER supports the proposed changes in the Determination and identifies the following benefits for VET data and research from these changes:

- NCVER can continue to provide greater context to our statistical publications through the use of ABS information that is publicly available.

³ <https://www.legislation.gov.au/Details/C2016C00979>

⁴ <https://www.legislation.gov.au/Details/C2014A00036>

⁵ <https://www.legislation.gov.au/Details/F2014L01204>

- The release of more business characteristics (including the ABN) and eliminating the requirement for business lists to be tabled in Parliament could be of significant benefit to the Survey of Employer Use and Views of the VET System (which NCVER administers), reducing production time to public release by 3-4 weeks, reducing costs through improved sampling efficiencies, reducing respondent burden, and providing more information about what types of business have apprentices and trainees.
- Greater opportunities for use of ABS de-identified data (for example work related training and adult learning, Census or Education and Work datasets) at a de-identified level for research that can inform and influence the Australian VET sector.

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