enterprise
registered training organisation
association

SURVEY REPORT

ASSESSING THE CURRENT CAPABILITY OF ENTERPRISE RTOs TO COLLECT AND REPORT AVETMISS LEARNER DEMOGRAPHIC DATA

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1 Purpose

To report the findings of a recent survey of ERTOA members concerning the feasibility, within the enterprise RTO business environment, of collecting and reporting each of the eighteen data elements contained in the Example Enrolment Form provided by NVCER.[1]

2 Background

In December 2009, the Council of Australian Governments (COAG) agreed to amendments to the Australian Quality Training Framework (AQTF). One of these amendments would make it a condition of registration that Registered Training Organisations (RTOs) have a student records management database in place with the capacity to provide AVETMISS compliant data.[2]

Advice to the National Quality Council (NQC) and the National Senior Officials Committee (NSOC) received from registering bodies and industry peak bodies indicated that a number of definitional and other issues needed to be resolved before the conditions and standards could be implemented effectively by RTOs and registering bodies. These include a range of governance and financial management issues as well as student records management system issues.

The NQC and NSOC have established a Joint Working Group to oversee the Strengthening the AQTF project. The project is reviewing guidelines and other documents that support the AQTF in order to align them with the revised AQTF 2010 Essential Standards for Registration. The finalised conditions and standards, together with the updated user guides for RTOs and related national guidelines that support the AQTF will be available by mid-June 2010.[3]

3 Managing training data in enterprise RTOs

Enterprise RTOs (ERTOs) are defined by the following essential characteristics:

- ✓ The enterprise RTO operates within, and is integrated with the wider business operations and processes of the enterprise.
- ✓ The core business the registered enterprise is not the provision of training.
- ✓ The enterprise RTO provides accredited training for the employees of the enterprise and does not charge student fees for the provision of its training and assessment services.

The development of ERTOs within the Australian VET sector is relatively recent. "Woolworths, recognised as being an 'early adopter', was first registered as an RTO in May 1996." [4] There are around 250 ERTOs currently operating across Australia.

ERTOs typically operate as quality workforce development enablers embedded within the business functions of their enterprise. Whilst some ERTOs receive Government subsidies to assist them to develop their employees, many do not. Learner demographic data, training

[1] *Copy available at http://www.ncver.edu.au/statistics/avetmiss60/Standard_Enrolment_Questions.pdf*
[2] *Extract from http://www.ncver.edu.au/statistics/avetmiss60/avetmissfaq.htm#AQTFReq on 31/05/2010*
[3] *See NQC Bulletin dated 20/05/2010 at http://www.nqc.tvetaustralia.com.au/aqtf*
[4] *Smith, Erica and Smith, Andy(2009)'Making training core business: Enterprise Registered Training Organisations in Australia', Journal of Vocational Education & Training, 61:3, page 289.*

effort and subsequent qualification or competency completion is not currently captured in national VET data collections unless it has been publically funded. This results in substantial under reporting of VET effort in total, and very considerable under reporting of VET effort in ERTOs.

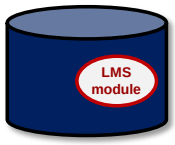
The recent ERTO profile report [5] found that the accredited training managed and provided by the typical ERTO represented less than half of the total training effort of the majority of enterprises surveyed (i.e. most of the enterprise's training effort is business focused and managed and non-accredited). In some examples the reported figure was less than 10%. In this training environment the protocols and systems for the collection and reporting of training data are driven by corporate/business needs and do not generally reflect the standard AVETMISS data sets.

Given that the core business of these enterprises is not the provision of training, it is not surprising to find that the key data base supporting the enterprise RTO operations is the corporate HRMS/payroll system. These corporate systems generally include some form of 'training management module' that reflects business needs, however, these have a strong corporate focus and are not 'AVETMISS compliant'.

The following diagram provides a broad overview of the approaches currently being used by enterprise RTOs for the collection and reporting of training data. Figures 1 and 2 typify the arrangements of enterprises which do not access any form of public funding – according to the recent ERTO profile report these represent around 38% of Australian ERTOs. Figures 3 and 4 are typically found in enterprises which access Australian traineeship program funding and comply with the reporting requirements of that program.

[5] *This DEEWR funded report was released in October 2009 is available at http://www.ertoa.org.au/publications.htm*

1



Enterprise HRMS

The Enterprise HRMS contains an integrated LMS module which shares employee personal data. The data elements contained in the LMS module reflect and support corporate training operations. Typical examples include SABA , SAP, Oracle and Alesco Talent 2. Many of the data elements appearing in the AVETMISS example enrolment form are not included in these data bases – as a result these LMS modules are not AVETMISS compliant. Customisation of these LMS modules to ensure AVETMISS compliance would be prohibitively expensive.

2

Enterprise HRMS

Proprietary LMS

A number of ERTOs have purchased and implemented propriety LMS with varying degrees of customisation to reflect business needs. The LMS typically exchanges data with the enterprise HRMS system, however, most of the data elements appearing in the AVETMISS example enrolment form are not currently collected or stored even though a small number of the proprietary are described as 'AVETMISS compliant'. Typical examples include; Manta-tas, Pathlore/Sumtotal and Janison. Many of these are systems are externally hosted.

3

Enterprise HRMS

Desk top LMS

A significant number of ERTOs have purchased and implemented desktop LMS solutions for the specific purpose of collecting and reporting accredited training data associated with traineeship programs. In this arrangement basic learner personal data is downloaded from the enterprise HRMS, however, the bulk of accredited training data resides in the desk top LMS and is not uploaded to the HRMS. The majority of ERTOs using this LMS approach have purchased and implemented VETtrak software. A small number have developed customised solutions using Moodle.

4

Enterprise HRMS

Desk top LMS

A number of ERTOs have purchased and implemented a desk top LMS solution for the specific purpose of collecting and reporting accredited training data associated with traineeship programs. However, in this arrangement the desk top LMS operates in isolation from other enterprise data bases – all accredited learning and learner data is input and stored on the desk top. Once again the majority of ERTOs using this approach have purchased and implemented VETtrak software.

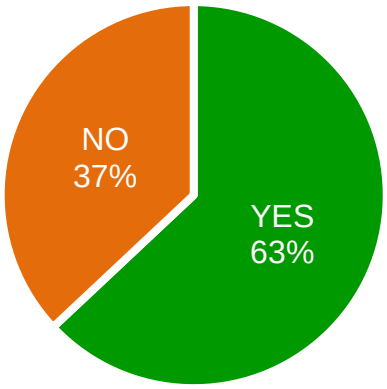
4 The survey

The member survey was developed by the ERTOA Secretariat and distributed on-line to members on 20th May 2010. By the closing date of 26th May 2010 returns from 54% of members had been received. This report is based upon the information provided in these returns.

5 The use of formal enrolment forms

The first question on the survey addressed the extent to which formal enrolment forms were used by member enterprises:

Are employees undertaking training towards accredited outcomes within your enterprise currently required to complete and sign a formal enrolment form before they commence their training program?



This result indicates that a significant minority of enterprise RTOs do not require their employees to complete any type of formal enrolment form as part of their standard accredited training and assessment programs. Within this type of training operation employees wishing to undertake a particular training program simply indicate this by applying for an available training place, usually via email, and their line supervisor (or other authorised person) approves their attendance.

Enterprise RTOs using formal enrolment forms usually do so to support the management of Australian Traineeship or Productivity Places programs they are conducting. The recent "Profiling the Australian Enterprise RTO' report indicates 62% of enterprise RTOs participate in this type of Government funded activity.[6] However, the enrolment forms used collect only a limited portion of the data included in the AVETMISS example enrolment form.

6 Current enterprise HRMS capabilities

The next question on the survey sought information about the capability of the enterprise's HRMS to capture and report the learner demographic data contained in the AVETMISS example enrolment form.

Please consider the following in the context of the HUMAN RESOURCE/PERSONNEL data base currently used by your enterprise. This question asks you to rate the feasibility of collecting/storing/reporting each of the following data elements by selecting one of the following statements:

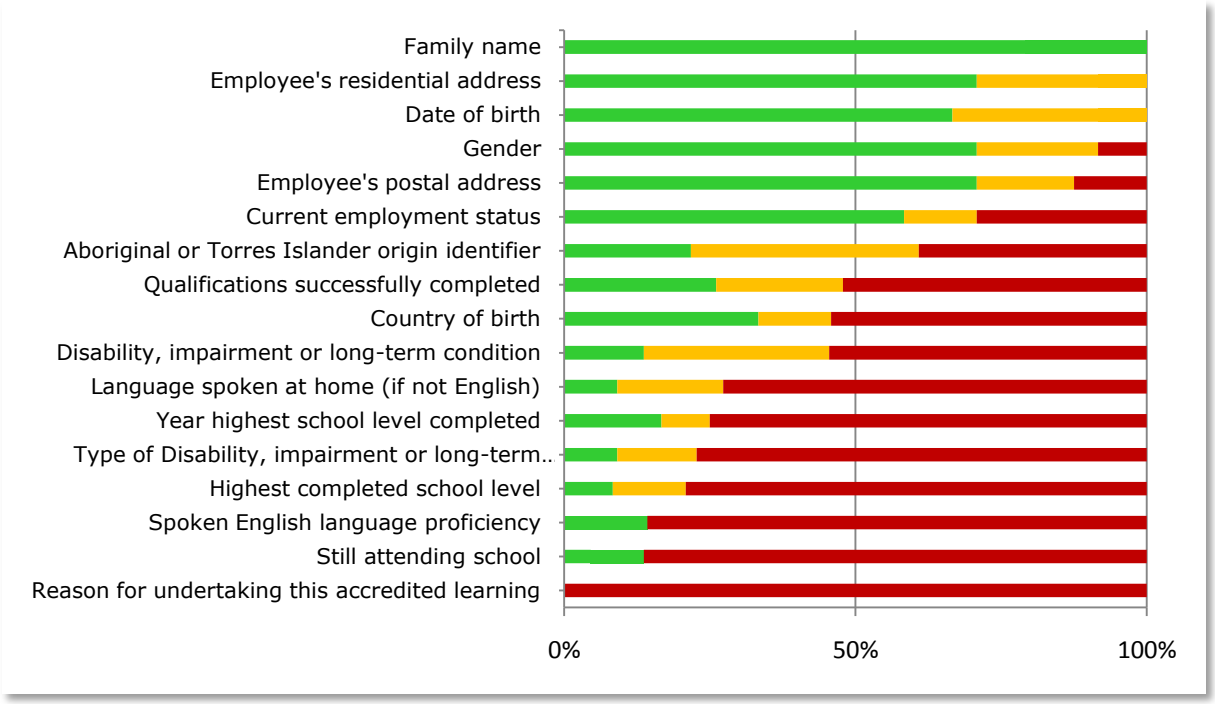
- *We currently use our HR data base to collect and/or report this data element*
- *Our current HR data base has the capability to collect and or report this data element but this is not done at present*
- *Our current data base does not collect and/or report this data element*

The results are summarised in the bar chart on the following page. The data elements listed on the left have been extracted from the example enrolment form. The bars associated with each data element show the proportion of respondents selecting each of the three choices as follows;

GREEN:	We currently use our HR data base to collect and/or report this data element
YELLOW:	Our current HR data base has the capability to collect and or report this data element but this is not done at present
RED:	Our current HR data base does not collect and/or report this data element

[6] ***This DEEWR funded report is available at http://www.ertoa.org.au/publications.htm***

For example, 100% of respondents reported that the HR data base currently collects and stores the data element 'Family name'. On the other hand none of the respondents reported that their current HR data base had the capability to collect and report the AVETMISS data element 'Reason for undertaking this accredited learning'.



These results indicate that enterprise HRMS are generally not capable of collecting and reporting a significant proportion of the AVETMISS learner demographic data.

6 Current enterprise LMS capabilities

The next question on the survey sought information about the capability of the enterprise's LMS to capture and report the learner demographic data contained in the AVETMISS example enrolment form.

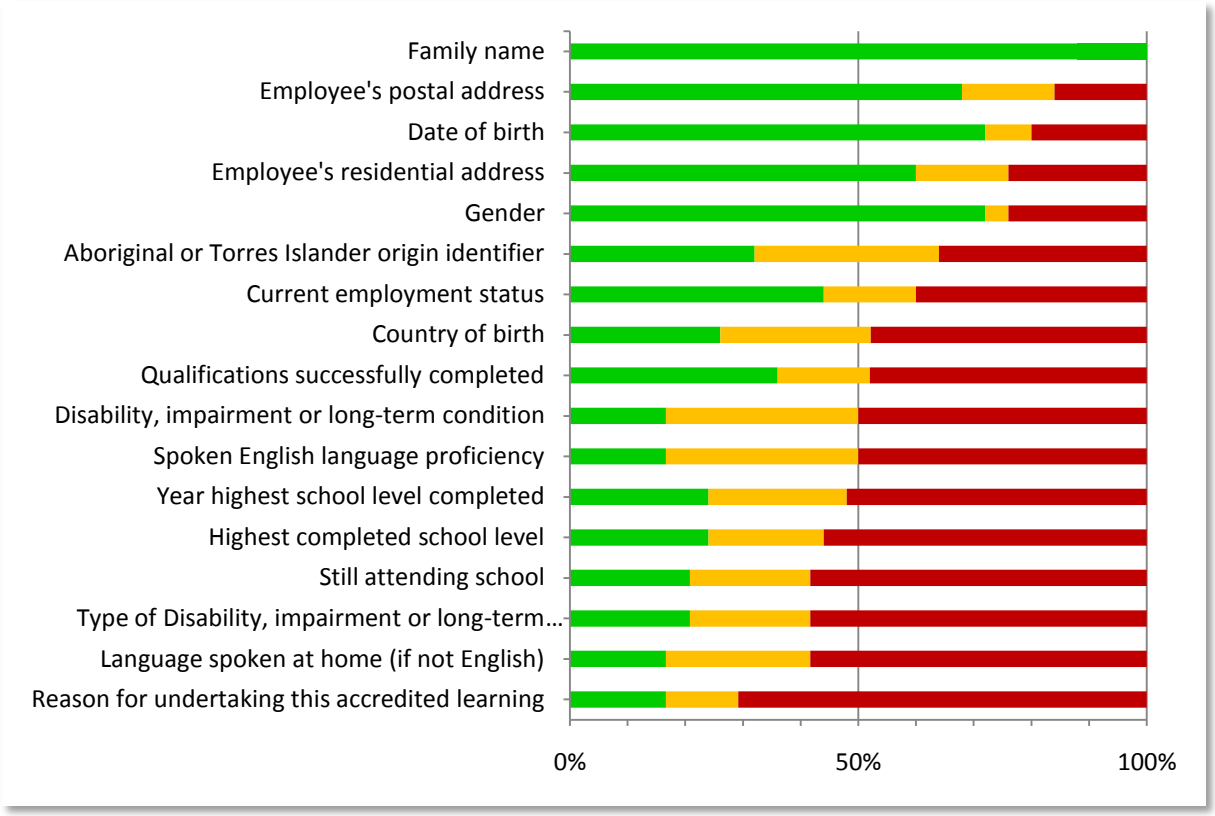
Please consider the following in the context of the Learning Management System (LMS) data base currently used by your enterprise. This question asks you to rate the feasibility of collecting/storing/reporting each of the following data elements by selecting one of the following statements:

- *We currently use our LMS data base to collect and/or report this data element*
- *Our current LMS data base has the capability to collect and or report this data element but this is not done at present*
- *Our current LMS data base does not collect and/or report this data element*

The results are summarised in the following bar chart. The data elements listed on the left have been extracted from the example enrolment form. The bars associated with each data element show the proportion of respondents selecting each of the three choices as follows;

GREEN:	We currently use our LMS data base to collect and/or report this data element
YELLOW:	Our current LMS data base has the capability to collect and or report this data element but this is not done at present
RED:	Our current LMS data base does not collect and/or report this data element

For example, 100% of respondents reported their LMS data base currently collects and stores the data element 'Family name'. On the other hand less than 30% of the respondents reported that their current LMS data base had the capability to collect and report the AVETMISS data element 'Reason for undertaking this accredited learning'.

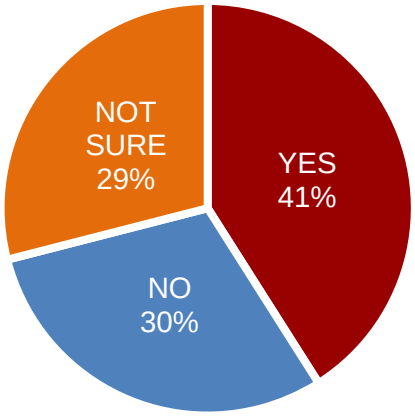


The results indicate fewer than 30% of responding enterprise RTOs have learning management systems capable of collecting and reporting all of the learner demographic data contained in the example enrolment form. Most of the enterprises capable of doing so use VETtrak software on 'stand alone' desk top PCs. The remaining 70% of enterprise RTOs operate learning management systems with significant shortfalls in their ability to collect and report the standard AVETMISS learner demographic data.

7 Privacy concerns about the release of personal employee data

A number of enterprise RTOs have indicated they may be constrained by legislation and/or enterprise policies from collecting and reporting employee personal data to an external organisation. The following survey question sought to obtain some measure of the potential level of difficulty this issue may present to them.

Could the current policies and procedures of your enterprise prevent you from collecting and/or reporting to an external organisation any of the data elements listed in the previous questions?



A minority of enterprise RTOs (~30%) indicated they would not be constrained in any way from collecting and reporting the full range of AVETMISS learner demographic data elements. However, 41% indicated that collecting and reporting this data to an external organisation could present significant problems for their enterprise.

The remainder (29%) were not sure about the impact this issue would have for their enterprise.

A range of brief comments provided by respondents about their concerns with this issue are listed below

- ✓ *We would need to check privacy laws. As all our trainees are employees their details are captured primarily into our payroll system for use in their employment. As such we would need to check the implications of using those details for an alternate purpose and also sharing those with an external party.*
- ✓ *There maybe a concern of breach of privacy. Additionally it would be cost inhibitive to covert our LMS/HR system across to an AVITMISS compliant system to meet all of the above criteria.*
- ✓ *Current Policy and/or procedures are related to Federal & State privacy legislation which requires an employer to take a conservative approach to disclosure of sensitive information. National Privacy Principle (NPP) 2.1(a) Primary and related purposes: The primary purpose (under the Act) of collecting the personal information is employment. Training is not an obvious primary purpose (to the employee) for collecting the information and the training department does not directly collect personal information on employees. There are higher risk factors for indirect collection of personal information. "If personal information is sensitive information the use or disclosure must be directly related to the primary purpose of collection." NPP 2.1(b) Secondary use and disclosure with consent: "This allows an organisation to use or disclose personal information for a secondary purpose if it has the individual's consent." This just opens up various interpretations and objections from individual employees. An example is pharmacists with Vietnamese names and ancestry that identify as Australian, speak exceptionally good English and only want the work address used instead of personal & postal as the training is workplace related and based.*
- ✓ *We would need to know the exact data required and then work from there. We have VETtrak, therefore, we are pretty much covered*
- ✓ *We will need to review our privacy policy, information collected in different methods / varying statements etc.*
- ✓ *Employee and business confidentiality will prevent us from reporting on some of the data listed above*
- ✓ *Much of it is irrelevant to our business and does not add anything to how we conduct our business*

- ✓ *We feel an obligation to protect the personal information of our employees and also we are seen as an equal opportunity employer, asking questions as to level of English, disability and or background (i.e. aboriginal) would not send out the right message as to the type of employer we are.*
- ✓ *Most of the data elements would be problematic due to privacy concerns & in certain areas of Defence security concerns. We need to justify the reason why are we reporting it to an external agency.*
- ✓ *See comment at Question 3. As an employer, under the anti-discrimination act, we are constrained in asking for some of the information included in the data elements.*
- ✓ *Anything that is a 'no' in the previous questions means that we do not have a process to collect this data and would require the expense of developing/purchasing new systems.*
- ✓ *As mentioned above, a number of the items are deemed voluntary under the organisations privacy policies so any data using questions such as origin, education, disability etc. would be inherently inaccurate. Mandating them could conflict with organisational (and potentially government/public service) policy.*
- ✓ *The complexity in our context is that a large number of our 'learners' are volunteers and dependant upon the specific volunteer group, different rules apply and different legislation comes into play. Our policies generally preclude us from releasing identifying data to a third party (such as the data reflected above). (Other than that stipulated in the FOI / Privacy Acts i.e. under summons, to police etc).*

8 Conclusions and recommendations

If the agreed AQTF 2010 definition of 'AVETMISS compliant data' reflects the current AVETMISS standard and the collection and reporting of this data is mandated from 1st July 2010 then a significant number of enterprise RTOs will be immediately non-compliant because;

- ✓ Their current enterprise data bases (HRMS/Payroll/LMS) do not have the capability to collect and report a significant proportion of the required learner demographic data.
- ✓ The policies of their enterprise may constrain their ability to collect and release the required learner demographic data to an external organisation

The HRMS/Payroll/LMS data bases used by the majority of enterprise RTOs will require substantial modification to become 'AVETMISS compliant'. For larger enterprises operating corporate systems such as SABA or SAP, the costs of modifying the current data base to provide AVETMISS compliance would be high and a substantial lead time would be required. In view of this the Enterprise RTO Association makes the following recommendations on behalf of its members;

Recommendation 1:	If 'AVETMISS compliance' is mandated from 1st July 2010 then a 'transition period' of at least twelve months should be allowed for enterprise RTOs to develop and demonstrate compliance within the typical business annual budget cycle.
Recommendation 2:	Given that the operational characteristics and learner populations of enterprise RTOs are distinctly different to those of TAFE and private providers it is recommended that during the transition period the definition of 'AVETMISS compliance' to be applied to enterprise RTOs be formally reviewed to ensure that the data to be collected and reported is both relevant to the enterprise and appropriate to the purposes and intent of the national AVETMISS collection.