THE UNIVERSITY OF SYDNEY

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Topic: **University of Sydney responses to the Department of Education and Training's,**
Publication of education agent performance data, **Policy Paper, released 16 January 2019**

FOR FURTHER INFORMATION

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Responses to consultation questions submitted through the department's submission portal:
https://www.education.gov.au/publication-education-agent-performance-data

1. Users

Understanding who will use agent performance data and for what purpose will assist the department to present it in the most helpful way.

Which organisation do you represent?

- The University of Sydney, Office of the Vice-Chancellor and Principal, with this feedback prepared in consultation with senior staff responsible for managing our relationships with education agents, our admissions processes, data management and analysis.

Who within your organisation would find agent performance data useful?

- The University of Sydney's student recruitment and admissions teams would find the proposed comparative agent performance data useful. The compliance and risk management teams and any departments working with international students in universities would also find the proposed additional agent performance data useful.
- Additional users could be our reporting centre, the Institutional Analytics and Planning and the Centre for English Teaching.

How do you think you would use it?

- Having access to the PRISMS agent performance data is useful in terms of assessing the relative performance of our agents. However, we strongly support the point made by the Go8 in its submission – that any decision to make agent performance data publicly available must "strike an optimal balance between providing clarity and quality assurance to agents, students and providers and inadvertently handing our competitor nations confidential data on our operations that could provide them with a commercial advantage".
- Our recruitment team would use the data for benchmarking our agent performance data as well as when exploring new potential agents and markets. The information available would enable us to plot this information against competitors' data and whole of industry enrolment data in our planning cycles.
- Our compliance team will use the data routinely to critically analyse our agents' performance, produce reports on agent performance for management and other relevant stakeholders, conduct detailed assessment of agent performance and recommend appropriate actions to ensure constant improvement.
- Our admission and recruitment teams could use this data to analyse which agents perform better for us than others and then use that information to focus our efforts to improve our competitiveness in recruiting international students from different countries and regions. These data would consequently assist our marketing efforts, as well as our approaches to the selection and training of agents.

2. Data and variables

PRISMS data includes a broad range of variables around student enrolment outcomes, these outcomes, providers and courses.

Which variables would be most useful for analysing agent performance in relation to student outcomes? For example, education sector, field of study, country/state/province of student origin, time of agent in market?

- The data variables of most interest and use to providers will depend on the sector/s in which the providers are operating. Therefore, we suggest that the department does not pre-empt the decision on what data variables are most useful, but rather ensures that all data captured within PRISMS are made available to providers with appropriate regard for privacy requirements. Providers can then retrieve the data sets they require to conduct their performance analysis. For example, agent performance data would ideally include the number of institutions they have applied to on behalf of a student for each successful enrolment achieved. Student behaviour and outcomes post enrolment would still be attached to an agent, yet many of those functions are not related to the agent unless the agent is re-engaged for a subsequent application.

- For our purposes, the most useful variables are:

  o Education sector, field of study, and course AQF level
  o Course AQF level
  o Student's country of origin (maybe even state and province)
  o Student's visa status
  o Duration of time agent is in market
  o Enrolment outcomes such as successful completion of enrolment; transfer to another provider; notification of early cessation of studies; having studies terminated for non-payment of fees or disciplinary reasons; being reported for unsatisfactory course progress or course attendance; deferral or suspension of studies; and non-completion for any other reason.

  In addition to the above, it would be helpful if more variables could be collected gradually about agents' **performance in the pre-enrolment stage** in close consultation with providers. The data currently on the department's proposed lists relate only to a small portion of the activities that agents undertake for Australian educational institutions. A greater focus on the pre-enrolment stage is required if this exercise is to accurately reflect the performance of agents across all relevant domains. For example, students have greater interactions with their agents prior to enrolment, in terms of application support, course/university selection support, student services, and visa application support amongst others. After enrolment, students require the services of an agent to a lesser extent, if at all. While there is significant value to be gained from measuring education agents performance in the pre-enrolment stage we recognise the difficulty of collecting this information in a reliable and comprehensive manner. We would be supportive of working with the department and other providers to identify the data about agents' performance in the pre-enrolment stages that would be useful for providers, and advise on how such data might be captured most efficiently.

3. Publication format

Agent performance data could be presented in a range of formats, including static tables and graphs, or pivot tables that allow the user to manipulate the data.

Which publication formats for agent performance data would be most useful?

The publication format should differ depending on the audience. We share the concerns the Go8 has expressed about the public release of agent performance data. For that reason, the preferred format from a registered provider perspective should be markedly different to the public.

Publication format for prospective students and general public

Public release of data should be restricted to static, top-level information that includes overview tables and/or graphs that are easy to understand but cannot be manipulated. This information will allow prospective students to compare agents without providing an overload of information. It is crucial to keep in mind that any publicly accessible site will be used mainly be competitors and education agents rather than by students. For a student facing site the available data needs to be top level and designed for what a student, deciding on an educational agent, would most need to know to make a decision. For example, if the intention is to help a student choose an agent to assist with enrolment at a specific institution then the parameters available for a student to search should reflect that intention and not display any further information.

Publication format for higher education providers

From a provider perspective, it is important that we can manipulate the data in order to produce specific reports. We therefore prefer the pivot tables and also the raw data in an Excel spreadsheet format. Should the data be distributed via PRISMS it will be important to ensure that all relevant institutional stakeholders have access. Currently access to PRISMS is restricted to selected teams such as admissions and compliance, however agent performance data is also important for recruitment and other university departments.

Alternatively, the data could be made accessible via a portal similar to MIP (The Data Company) where institutions have registered users with access.

4. Publication location

The department is considering where to publish agent performance data. It could be located with the international student data collection on the department's website, on the CRICOS website, with advice to students on choosing an education agent on the Study in Australia website, or somewhere completely new.

Where would it be most helpful to publish agent performance data?

We have serious concerns in relation to publishing data on agents and stress the need to consider the commercial sensitivity of this data for Australian institutions. An agent may perform exceptionally well for one provider and not so well for another provider and yet be "named and shamed" if his/her identity is linked to the data that is to be made publicly available. Similarly, agents may (validly) argue that the performance of students post enrolment extends way beyond their scope of responsibility. There are serious commercial considerations to take into account in consultation with providers before the department makes the decision to publish specific data of this kind.

Below we list two different options for how the performance data could be published, once agreement is reached with providers about the content and format of the data to be released:

I. Information could be displayed on the Study in Australia website. Currently there is a paragraph under the title 'Appointed Education Agents' that recommends student visit each provider's list of appointed agents. Having the performance data listed, or a link available in this section would provide students with greater knowledge and understanding before they refer to the provider's list of appointed agents. However, it is important that the data that is publicly accessible supports the industry, rather than causing inadvertent harm.

II. Another option would be to publish these data on the Australian Government's CRICOS website with links to other government and providers' websites where the student might be likely to access information regarding agents.

5. Publication timing

The department's initial publication in 2019 is expected to include all data available up to the quarter of publication. Subsequent publication could occur quarterly, twice yearly or annually.

What is the preferred timing for regular publication of agent performance data?

- Publication twice yearly will be sufficient. Quarterly would be too short, as it may take months from when a student selects an agent, lodges an application, accepts, and then applies for the student visa and enrols.

6. Data quality and coverage

From 1 July 2012, providers voluntarily entered agent details in PRISMS. Since 1 January 2018, providers must enter and maintain agent details in PRISMS. The department will cleanse the data prior to publication.

What issues should the department consider when preparing the agent performance data for publication?

- Given the concerns from many education providers we recommend that no decision about the details and extent to which education agent performance data will be published should be made without the full endorsement of an appropriate body of experts and representatives of education providers. The expert members of the Council for International Education, for example, could be an appropriate body to review the department's final publication proposals. Consultation and endorsement should also be obtained from the Universities Australia Deputy Vice-Chancellor (International) Committee and the similar groups that exist in other sectors.
- It would be useful to provide clarity for the end-user of the data/reports about the Government's reasons for making the data publicly available and highlight any data limitations.
- As these data are commercially sensitive for providers and agents, the department must carefully weigh the cost and benefits of making each data set publicly available. For some data sets it may be necessary to present the data in formats that do not allow individual agents and/or provider to be identified.
- The published data should be easy for students and other potential users to understand without potential for misunderstanding or misinterpretation.

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- The department also needs to consider that naming conventions are not consistent across all sectors/institutions. Unless a central registry is established there will always be inconsistency. For example, one institution might list the company as "ABC" while another might list it as "ABC (Melbourne)" yet another may list it as "Australia Beyond Cambodia (ABC)" etc. PRISMS data are not necessarily cleaned by all institutions regularly.
- There is also the issue of eCOEs showing agent offices when PRISMS' reports are summarised by agent groups. This leads to incorrect groupings in these summaries. This presents a risk to any data intended for public release.
- In term of concluding remarks, we reiterate our strong support for the concerns raised by the Go8 in its submission regarding the department's proposal to make detailed performance data about individual agents available publicly on a website. Maintaining the integrity of the Australian international education sector through enhanced transparency measures is an important objective. However, we must ensure that this desirable objective is balanced appropriately against the risk of unintended consequences arising from the publication of commercially sensitive data about agent performance that may be open to misinterpretation, misunderstanding and misuse.