

**Summary of Submissions  
Information for Learners  
June 2014**

Prepared for  
Tertiary Education Commission  
Te Amorangi Mātauranga Matua

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Level 9, iCentre Building  
50 Manners Street  
PO Box 24181  
Wellington 6142

TEL +64 4 473 3885

FAX +64 4 473 3884

[www.litmus.co.nz](http://www.litmus.co.nz)

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## Contents

1.	Executive Summary	1
2.	Introduction	3
2.1	Background	3
2.2	Profile of submitters	3
2.3	Submission analysis process	4
2.4	Report structure	4
3.	Detailed submission feedback	5
3.1	Question 1: Two objectives	5
3.2	Question 2: Efficient and effective implementation process	9
3.3	Question 3: Principles of good information	11
3.4	Question 4: Benefits	16
3.5	Question 5: Key information set	19
3.6	Question 6: Improving information delivery	24
3.7	Question 7: Presentation and publication specifications	28
3.8	Question 8: Other comments, considerations and issues	32

## Tables

Table 1: Profile of submitters	3
Table 2: Do you agree with the Objective 1 of the Information for Learners work?	5
Table 3: By submitter groups: Do you agree with the Objective 1 of the Information for Learners work?	6
Table 4: Do you agree with the Objective 2 of the Information for Learners work?	6
Table 5: By submitter groups: Do you agree with the Objective 2 of the Information for Learners work?	7
Table 6: Do you agree with the principles of good information for learners?	12
Table 7: By submitter groups: Do you agree with the principles of good information for learners?	13
Table 8: Do you agree with the intended benefits of the Information for Learners work?	16
Table 9: By submitter groups: Do you agree with the intended benefits of the Information for Learners work?	17
Table 10: Do you think the TEC's key information set covers the necessary information categories to deliver on the objective of strengthening the information content?	19
Table 11: By submitter groups: Do you think the TEC's key information set covers the necessary information categories to deliver on the objective of strengthening the information content?	20
Table 12: Do you think that the TEC's proposal for information to be published by the TEOs and centrally fulfils the objective of improving information delivery so that it is useful and accessible to prospective learners?	24
Table 13: By submitter group: Do you think that the TEC's proposal for information to be published by the TEOs and centrally fulfils the objective of improving information delivery so that it is useful and accessible to prospective learners?	25
Table 14: Do you agree with the presentation and publication specifications of the key information set?	28
Table 15: By submitter groups: Do you agree with the presentation and publication specifications of the key information set?	29

# 1. Executive Summary

## Overview of submission purpose and submitters

On 10 June 2014, the Tertiary Education Commission (TEC) released for stakeholder consultation Information for Learners: Publishing information to inform enrolment decisions. Following international trends, the Information for Learners consultation documents details TEC's proposed approach to strengthen the content and delivery of the information that prospective learners, their families and their advisors need to make more informed tertiary education decisions. Consultation on Information for Learners was over a six week period, starting 10 June 2014 and concluding 22 July 2014.

In total, 63 written submissions were received from 20 Private training establishments (PTEs), 16 Institutes of technology and polytechnic (ITPs), seven universities, four tertiary education representative bodies, three learner groups and 13 Other organisations.

## Common themes across submitters

Across submitters there is support in principle for the intent of the Information for Learners specifically to enable informed decision making by learners and their families. Some question the need, and many have issues with the proposed content of information set, the implementation process and data responsibilities.

### Need

- The underlying need for Information for Learners was questioned particularly by submitters from universities, given the existence of similar information on Tertiary Education Organisations (TEOs) and Careers NZ websites.

### Proposed information set

- The proposed information set is not perceived as reflecting the diversity of TEOs and as such is potentially disadvantaging PTEs, ITPs and smaller providers.
- The diversity of learners seeking information is also not reflected due to the focus on learners under 25 years.
- The limited data set focused on economic outcomes does not include all the variables and potential outcomes considered by learners when making tertiary education decisions and there is a lack of focus on those who influence their decision.
- Concerns were raised with the following data variables due to the diversity of providers and inability to meaningfully compare across diverse TEOs and thus the potential for the data to be misleading if taken out of context: qualification completion, retention, and graduate earning and employment. Data relating to government contribution in fees was seen as irrelevant and potentially confusing to learners.

### Publication

- Feedback suggests that the proposed information set will not be accessible to all learners, particularly the tertiary education priority groups, due to language used, complexity of data and the sole reliance on internet distribution.

### Data collection process

- Concerns were raised with the workload and costs in collecting and maintaining the data set, and whether TEOs will be able to gather and report accurate data.

- The need for quality assurance of data was noted to ensure its completeness and comparability. In this context, there is a preference for TEC or an independent body to undertake the role of data collection and validation.

## Overarching submitter feedback

Below is a high level summary of feedback from the different submitter groups. While there is consistency of feedback from submitters, there are also differing positions.

**PTEs** are mainly concerned that the information prescribed by the Information for Learners work does not adequately and accurately represent the nature of the programmes offered by them, nor does it provide information relevant to learners who primarily attend PTEs. PTEs request the inclusion of additional information in the key information set to account for their target audience. PTE submitters also comment on the cost and feasibility of Tertiary Education Organisations (TEO) compliance in data collection and maintenance of the published information. PTEs feel that the prescribed information and delivery format (online) excludes their target audience. In particular, PTEs contend the Expected outcomes (graduate employment, qualification completion, retention) information area will be irrelevant or misleading for their learners.

**ITPs** believe comparability across TEO sub-sectors is not achievable, as the diversity of TEO sub-sectors makes it impossible to compare 'like' with 'like.' ITP submitters feel the prescribed information excludes population groups that make up ITP target audiences, as does the proposed online delivery format. Additionally, ITPs generally propose further information is added to the key information set to better inform learners decision-making processes which are based on a multitude of factors (not just economic). ITPs find the expected outcomes information area of the key information set particularly inaccurate or irrelevant for learners.

**Universities** mainly took issue with the compliance required of TEOs in the implementation of the Information for Learners work in collecting data and maintaining and updating the information once published. Universities question the relevancy of the proposed information as they contend it is largely already available to prospective learners. University submitters also query the accuracy and validity of the information as it will have to be synthesised to ensure comparability.

**Tertiary Education representative bodies**, in general, acknowledge the limited scope of the prescribed information proposed by the Information for Learners work. This does not facilitate accurate representation of programmes and qualifications offered by organisations that are represented by Tertiary Education representative bodies. Additionally, the online delivery format and presentation of information excludes population groups that largely make up learners in certain TEO sub-sectors. Tertiary Education representative bodies also acknowledge the compliance costs and feasibility issues involved in data collection and maintenance of the published information.

**Learner groups** acknowledge the wider factors that influence learner decision making, and are concerned the information proposed by the Information for Learners work does not adequately reflect those wider considerations.

## 2. Introduction

### 2.1 Background

On 10 June 2014, the Tertiary Education Commission (TEC) released for stakeholder consultation Information for Learners: Publishing information to inform enrolment decisions.

Since 2012, TEC has been working to gain a deeper understanding of the information needs of prospective learners when they are making tertiary decisions. Internationally, there is increasing emphasis on improving the accessibility and usability of information available for prospective learners. Following international trends, the Information for Learners consultation documents details TEC's proposed approach to strengthen the content and delivery of the information that prospective learners, their families and their advisors need to make informed tertiary education decisions.

Consultation on Information for Learners was over a six week period, starting 10 June 2014 and concluding 22 July 2014. Stakeholders were invited to provide feedback on the Information for Learners work using an online structured consultation response form.

### 2.2 Profile of submitters

In total, 63 written submissions were received. Table 1 profiles submitters.

**Table 1: Profile of submitters**

Submission Groups		Individual number n=63	Analysis groups n=63
<b>Private training establishments (PTE)</b>	Private training establishments	20	<b>20</b>
<b>Institutes of technology and polytechnic (ITP)</b>	Institutes of technology and polytechnic	16	<b>16</b>
<b>Universities</b>	University	7	<b>7</b>
<b>Tertiary Education representative bodies</b>	Tertiary Education representative bodies	4	<b>4</b>
<b>Learner groups</b>	School (including careers advisors at schools)	3	<b>3</b>
<b>Other</b>	Employer	1	<b>13</b>
	Industry Training Organisation (ITO)	1	
	Government agency	1	
	Other	4	
	Not specified	6	

## 2.3 Submission analysis process

Litmus used the following process to analyse the submissions:

- Understanding the consultation context through discussions with the TEC and review of key documents including the consultation document and consultation response form
- Grouping submitters into analysis groups (refer Table 1) to enable exploration of quantitative responses across submitter groups
- Generating tables for quantitative responses by total and submitter groups
- Developing thematic code frames for each of the open-ended questions based on submitters' responses
- Coding all submissions and data entry of codes into the Excel database, and validating coding and data entry
- Analysing the database to identify the strength of comments and feedback received, as well as exploring themes emerging from submitter groups.

## 2.4 Report structure

The report commences with an overview of the key themes across submitter groups to present an overarching perspective of feedback on the Information for Learners work.

The report is then structured to reflect the consultation response form and presents the feedback to the eight questions posed. Each section follows a similar structure:

- A presentation of the quantitative data agreement/ disagreement with the question at a total response level and then by submitter groups.
- An overview of the common themes arising from the qualitative feedback.

Litmus has analysed all submissions before preparing this report, and has re-read each submission to validate the themes presented.

### 3. Detailed submission feedback

#### 3.1 Question 1: Two objectives

The goal of the Information for Learners work is to enable prospective learners to assess the value of tertiary education and how it will contribute to their achievement of the outcomes desired. TEC has proposed two main objectives for this work:

1. To strengthen the content of the information that is available to learners to support their decisions on what and where to study
2. To improve the delivery of the information that is needed.

**59 submitters answered the question** ‘Do you agree with the two objectives of the information for Learners work?’

#### Objective 1

A 7-point rating scale was used to determine the level of agreement. As shown in Table 2, of those who answered this question, three quarters strongly agree with the Objective 1 of the Information for Learners work, and one in ten were neutral, specifically:

- 74% agree to strongly agree (5, 6 and 7 combined)
- 10% neutral (4)
- 10% disagree to strongly disagree (1, 2 and 3 combined)
- 5% don't know.

**Table 2: Do you agree with the Objective 1 of the *Information for Learners* work?**

Submitter response Base: all submitters who answered the question		n=59		n=59	
		No.	%	No.	%
Strongly agree to agree	7	23	39%	44	74%
	6	12	20%		
	5	9	15%		
Neutral	4	6	10%	6	10%
Disagree to strongly disagree	3	1	2%	6	10%
	2	2	3%		
	1	3	5%		
Don't know	Don't know	3	5%	3	5%

Analysis by submitter groups highlights that agreement is fairly consistent across submitter groups, with the exception of PTEs and University where a third are neutral about or disagree with Objective 1 (refer Table 3).

**Table 3: By submitter groups: Do you agree with the Objective 1 of the Information for Learners work?**

Submitter response Base: all submitters who answered the question		PTEs n=20	ITPs n=15	Uni n=6	TE Reps n=3	Learner groups n=3	Other n=12
Strongly agree to agree	7	8	8	1	1	1	4
	6	4	5			1	2
	5	2	2	2	1		2
Neutral	4	3		1	1		1
Disagree to strongly disagree	3	1					
	2	1		1			
	1	1				1	1
Don't know	Don't know			1			2

## Objective 2

As shown in Table 4, of those who answered this question, seven in ten agree or strongly agree with Objective 2 of the Information for Learners work, specifically:

- 70% agree to strongly agree (5, 6 and 7 combined)
- 15% neutral (4)
- 10% disagree to strongly disagree (1, 2 and 3 combined)
- 5% don't know.

**Table 4: Do you agree with the Objective 2 of the Information for Learners work?**

Submitter response Base: all submitters who answered the question		n=59 No.	n=59 %	n=59 No.	n=59 %
Strongly agree to agree	7	21	36%	41	70%
	6	9	15%		
	5	11	19%		
Neutral	4	9	15%	9	15%
Disagree to strongly disagree	3	1	2%	6	10%
	2	2	3%		
	1	3	5%		
Don't know	Don't know	3	5%	3	5%

Analysis by submitter group (refer Table 5) highlights that there is general agreement across the submitter groups with Objective 2. As for Objective 1, a third of PTEs and half of universities are neutral or disagree with Objective 2.

**Table 5: By submitter groups: Do you agree with the Objective 2 of the Information for Learners work?**

Submitter response Base: all submitters who answered the question		PTEs n=20	ITPs n=15	Uni n=6	TE Reps n=3	Learner groups n=3	Other n=12
Strongly agree to agree	7	6	8	1	1	1	4
	6	3	4		1		1
	5	5	1	2			3
Neutral	4	4	1	1	1	1	1
Disagree to strongly disagree	3		1				
	2	1		1			
	1	1				1	1
Don't know	Don't know			1			2

## Feedback on the two objectives

Submitters were asked to comment on the two objectives of the work and whether other objectives were needed.

**29 submitters gave feedback on the two objectives.** Feedback received tended to raise broad concerns with data and information quality related to the proposed Information for Learners work rather than specific feedback on the two objectives. Only one comment was received suggesting a new objective about measuring the value of the information for learners.

Detailed below are the broad concerns raised.

### Comments on quality of information content

Submitters, in particular ITPs and PTEs, acknowledge the need to fulfil the purpose set out in the Information for Learners' objectives to strengthen the content and improve the delivery of information to support learner decisions. These submitters support the work partially and in principle, although note issues with the work as it stands.

Submitters across universities, ITPs, an Employer organisation and government agency are in strong agreement that the **proposed information is already provided** by TEOs on their websites, or is available at the Careers NZ website.

Issues raised with the quality of the information include **guaranteeing an accurate process of data collection to ensure information is reliable and comparable**. One PTE submitter notes that if TEOs are to take a substantial role in data collection, then the **compliance process must be streamlined**. PTEs also raise **concerns about the data**

**variables** being used and their potential to mislead learners, in particular graduate employment outcomes data. They note that the TEC would need to monitor and check the information to ensure it is accurate and meaningful for the learner.

### **Prescribed selection of information irrelevant and does not reflect diversity of providers**

Submitters are concerned that the prescribed selection of **information does not reflect the diversity of TEOs**. These concerns were especially raised for niche providers such as ITPs focused on distance learning or foundation learners, or English for Speakers of Other Languages [ESOL] providers). Consequently, these niche providers could be disadvantaged resulting in a negative impact on their enrolment and student retention.

Some submitters note that the **information is not relevant to their target audience**, and therefore would not support their learners' 'decisions on what and where to study' as outlined in Objective 1. In particular, the information is not seen as relevant for learners who study at ITPs and PTEs (e.g. part-time or extra-mural students, foundation learners). Additionally, the inclusion of government contribution information is identified as irrelevant and potentially confusing for learners and information seekers.

PTEs and ITPs comment that the **prescribed information does not account for other benefits of tertiary education** that their learners may be looking for (e.g. opportunities for career advancement and salary increases, personal achievement over learning difficulties such as dyslexia). Furthermore, one university submitter noted that by delivering narrowly focused economic information, the TEC will not fulfil the two objectives, because:

*The potential exists for learners, their families and advisors to discount the wider contribution made by TEO's based of performance statistics and may not enable learners to make informed decisions. (University)*

### 3.2 Question 2: Efficient and effective implementation process

**40 submitters answered the question** ‘To make the implementation process for this work as efficient and effective as possible, please comment if you think there are administrative or other relevant issues specific to TEO sub-sectors for the working group to consider when planning the implementation of this work.’

Submitters responded to the question with a range of access, interpretative, compliance and comparability issues for the working group to consider.

#### Learner access and interpretation of the information set restricted

Some PTE submitters are concerned that the **proposed delivery format of the information set will exclude certain population groups that largely attend PTEs.**

Assumed Internet access is identified as a significant barrier for a large cohort of their target audience (e.g. those in jail, lower socio-economic groups).

*The focus on utilising websites for publishing assumes equal access to technology and the Internet. While this has improved significantly over time, there are communities served by the PTE sector that do not have this access or are limited by the technology that they do have access to. (PTE)*

Additionally, a number of submitters from the ITP and PTE sub-sectors request the information to be communicated differently to make the information more meaningful to their learner groups. Some submitters feel that content of the information set in its **current format is too complex for their learners.** They recommend changes to content and wording that would better enable learners to interpret and understand the information. One PTE that targets foundation learners notes:

*It is important that the work on the content and dissemination of information acknowledges this group: for example in the format and language used and in the options for accessing the information. (PTE)*

Some submitters from ITPs, Tertiary Education representative bodies, PTEs and other suggested **additional or different data should comprise the qualification completions information area** to adequately represent the nature of the qualifications they provide. They believe the current format of the qualifications completions information area could negatively impact PTEs.

*PTE's have structures that may include embedded additional qualifications; leading to completion rates well in excess of 100%. This would not be easy to interpret by prospective students. (PTE)*

Of these submitters, two ITPs query the accuracy and timeliness of Education Performance Indicators (EPI) data if it was to be used to represent graduate outcomes because it is not applicable for all kinds of qualifications. A few PTE submitters suggest the use of the post-Targeted Review of Qualifications (TRoQ) data in the information category as this would be more meaningful for learners and ensure consistency across TEOs. One PTE submitter notes that the *Information for Learners* work should aim to:

*Avoid a one-size-fits-all approach to allow a certain amount of flexibility for niche educators to accurately reflect information pertinent to their area of specialisation. (PTE)*

### TEO compliance in data collection not feasible

Compliance in data collection is a significant issue for some submitters to the implementation of the Information for Learners work. Universities, ITPs and PTEs note that the **collection and maintenance of data (i.e. quality checking and timely updating) should not be the responsibility of TEOs**. Instead they suggest that the TEC or an independent body undertake the role of data collection and validation.

Several submitters from the PTE, ITP and university sub-sectors are **concerned about the work and costs involved in collecting this data**. The cost of the data collection referenced both cost to TEOs and the TEC.

*Another big issue is the cost to us of gathering this information. This is additional to current compliance and could take an estimated three extra days per student (approx. \$500 per student.) (PTE)*

### Valid comparison across TEO sub-sectors not possible

Some submitters from the ITP, PTE, Tertiary Education representative bodies and ITO sub-sectors note that the **diversity of qualification structures and pathways was not accounted for in the proposed information set**. For example,

*The widely varying size of ITP programmes from short courses to multi-year programmes. These characteristics mean that an EFTS-weighted qualification completion rate is less informative than the cohort-based qualification would be. (Tertiary Education representative body of ITPs).*

A few submitters from the ITP and university sub-sectors **question the validity of the information when it is re-purposed and synthesised to composite data** to ensure comparability across TEO sub-sectors.

*As the ITP sector has a vastly different student and programme profile (i.e. far more part-time students and students transitioning from one programme to another) many of the measures may not be sensible when collated on the basis suggested. (ITP)*

### Other comments: publication process suggestions

Taking inspiration from the United Kingdom's UNISTATS website, one ITP submitter requested the **TEC develop an Application Programming Interface (API) to make the publishing process easier**.

*In the UK the UNISTATS website holds data about all TEOs, but also mandates the display of provider specific information on the provider's website. (ITP)*

One university submitter acknowledges: *A possible outcome of pressure to produce competitively comparable outcomes may be the perception that institutes must lower their standards to make themselves seem more attractive. This debate has had some airing in the popular press in the UK in response to the "UNISTATS" website which also published the NSS outcomes<sup>1</sup>. (University)*

<sup>1</sup> In the UK, the National Student Survey (NSS) gathers students' opinions on the quality of their courses. The purpose of this is to contribute to public accountability, help inform the choices of prospective students and provide data that assists institutions in enhancing the student experience <http://www.hefce.ac.uk/whatwedo/it/publicinfo/nss/> accessed 14 August 2014.

### 3.3 Question 3: Principles of good information

The TEC proposes that four principles underpin useful information that informs learner enrolment decisions:

- **Comparability:** Information should be provided in a way that allows easy comparisons between providers and qualifications. Prospective learners need the chance to compare like information and make decisions based on the information that is important to them.
- **Accessibility:** Information should be provided in an accessible way that promotes usability. There can be a number of barriers for prospective learners in terms of how easily they ‘access’ information. Information must be not only easy to find, but provided to the user in a way that they can easily understand and apply in their decision-making.
- **Robustness:** The accuracy and timeliness of the information is important for ensuring user confidence in the information.
- **Fit for purpose:** It is important to provide information that can be used for the purpose that it is intended. Prospective learners need information that is meaningful and appropriate to inform their decisions when entering and navigating the tertiary education system.

**56 submitters answered the question** ‘Do you agree with the principles of good information for learners (refer to pages 9 and 10), that to be useful for prospective learners in determining what and/or where to study, information must be comparable, accessible, robust and fit for purpose?’

As shown in Table 6, of those who answered this question, two thirds agree or strongly agree with the principles, specifically:

- 65% agree to strongly agree (5, 6 and 7 combined)
- 14% neutral (4)
- 14% disagree to strongly disagree (1, 2 and 3 combined)
- 5% don’t know.

**Table 6: Do you agree with the principles of good information for learners?**

Submitter response Base: all submitters who answered the question		n=56		n=56	
		No.	%	No.	%
Strongly agree to agree	7	26	46%	37	65%
	6	3	5%		
	5	8	14%		
Neutral	4	8	14%	8	14%
Disagree to strongly disagree	3	3	5%	8	14%
	2	2	4%		
	1	3	5%		
Don’t know	Don’t know	3	5%	3	5%

Analysis by submitter group (refer Table 7) highlights across the board agreement with the principles of good information; although PTEs and universities are more likely to disagree or hold neutral opinions.

**Table 7: By submitter groups: Do you agree with the principles of good information for learners?**

Submitter response Base: all submitters who answered the question		PTEs n=20	ITPs n=15	Uni n=5	TE Reps n=3	Learner groups n=2	Other n=11
Strongly agree to agree	7	10	10	1	1	2	2
	6				1		2
	5	2	4				2
Neutral	4	4	1		1		2
Disagree to strongly disagree	3	1		2			
	2	1		1			
	1	2					1
Don't know	Don't know			1			2

## Feedback on the principles of good information

Submitters were asked to make general comments on the principles, and suggest whether there are other principles that need to be considered as part of this work.

### 33 submitters gave feedback on the principles of good information for learners.

Some submitters reiterated their general agreement or disagreement with the principles of good information. A number of submitters across the ITP, PTE, Tertiary Education representative body and university sub-sectors and one Employer state they agree in general with the principles of good information generally. One Other submitter comments in particular:

*We especially support the intention to ensure consistency of information so learners can compare institutions according to their most valued criteria. (Other)*

A smaller number of submitters from the Tertiary Education representative body, university and PTE sub-sectors disagree with the principles of good information. As expressed by one PTE:

*Information must be accessible, robust and fit for purpose, however in the proposed format we do not believe it will be any of these things or comparable. (PTE)*

Other submitters from the PTE sub-sector, and one Learner group submitter and one university submitter suggested additional principles to accompany the four principles of good information. Principles suggested include timeliness, reliability, and a principle that ensured a learner-led or future-focus outlook.

*An important additional principle is ‘timeliness’. A consistent finding in studies on student choice is that students/families begin discussing/decision making well before year 11/12. (University)*

*To create real benefits to learners this work must be driven by the information and support needs of learners. Taking a learner-led approach to the provision of information and support should recognise diverse learners, their goals and objectives, and the broad range of contexts in which tertiary learning occurs. (Employer)*

## Comments on the principles of good information

Submitters responded to the question by noting the current design of the Information for Learners work does not meet the standards implied within the proposed principles. Submitters comment that:

- The comparability principle is not met as the diversity of TEO sub-sectors is not accounted for in the Information for Learners work.
- The accessibility principle is not met as the current presentation and delivery of information excludes population groups.
- Issues with data collection undermine the robustness principle.
- The current information content is not seen as relevant and meaningful to all learners, and does not provide enough information thus the fit for purpose principle is not met.

### Comparability principle: diversity of providers in TEO sub-sectors not accommodated

Submitters from ITPs, PTEs, and university and one Employer feel **the current information content does not reflect the diversity of providers, nor the diversity of niche population groups** that generally make up the cohorts of providers within certain TEO sub-sectors. One ITP submitter acknowledges that:

*There will be difficulties in ensuring comparability of information across sectors where sector delivery models and targeted outcomes are different, for example, ITOs and ITPs; PTEs and Universities. The model needs to be very clear as to whether it is comparing information about programmes or qualifications.*

A few submitters express concerns that the comparability mechanism favoured universities, and would not allow for useful comparisons across TEO sub-sectors.

*The consultation document appears to be underpinned by a traditional ‘learner’ view of someone who is young transitioning from school-based learning to university-based learning. (Employer)*

Comparable graduate outcomes (qualification completion, retention, and graduate employment data) in particular are noted by a few PTEs and ITPs as misleading.

*The data suggested for graduate outcomes refers to ‘employment rates’ and ‘graduate incomes’ – using nationwide averaged data from the MoE. This in itself reduces the ability of a prospective learner to compare the outcomes from different providers (where there may be market perceptions of greater or lesser quality across multiple providers of the same qualification). (ITP)*

**Accessibility principle: Information proposed is exclusive, complex, already available**

A few PTE and Tertiary Education representative body submitters note that this information **would not be accessible to all learners** if it was only able to be accessed via the Internet. Paper-based options are suggested, as well as specialised information services for niche population groups.

*With ESOL learners who are pre-literate/semi-literate going to a website to access this information would not be their first port of call in finding an ESOL provider to meet their needs. An ESOL learner is more likely to want to talk to someone about what is available out there. The resurrection of the TEC ESOL Assessment and Access Specialist Service would be ideal for this purpose. (PTE)*

Some submitters across the ITP sub-sector, PTE, university, Tertiary Education representative body and Other submitter group acknowledge the format of the **information delivery was too complex** and will require additional guidance for a learner to make sense of it. One ITP submitter notes that

*There is a complexity with the information set and whole providers and agencies such as TEC understand what terms such as ‘qualification completions’ mean. There is a risk for the TEC and the TEO that the learner will have a very different view. (ITP)*

Explanatory notes to accompany the table or additional support from careers advisors will be necessary to facilitate an informed decision making process.

**Robustness principle: Issues with data collection**

Some ITP, PTE, university, Tertiary Education representative body, and Other submitters have **issues with the accuracy and reliability of the data collection process**. Additionally, these submitters feel that maintaining timely information will be hard to manage. Differing sample sizes and the non-linear employment outcomes of niche areas of tertiary study will make the data collection process flawed and possibly inaccurate. One PTE submitter uses the Creative Arts as an example of the complexity of data collection –

*Within the Creative Arts a myriad of opportunities are available spanning multitudes of specialist areas all with differing pay scales and success rates. It is very difficult to accurately quantify some of the proposed parameters, and comparisons between providers. (PTE)*

**Fit for purpose principle: Quality and variety of information content**

Some ITP, Tertiary Education representative body, PTE and one Employer submitters highlight that the **prescribed information set would not be meaningful for their target audiences**. A few submitters feel that government contribution information in particular is not relevant for learners.

*I’ve been doing this for 18 ½ years, and I’ve never had a student interested in what the Government contributes. (PTE)*

Across ITP and PTE sub-sectors and one university, one Employer and one learner group submitters note that other information about a TEO is more pertinent to learners’ decision making processes.

*For example, learner's experience; organisation's values and culture, provider uniqueness, i.e. small classes; delivery/study modes, time required to achieve outcome. (ITP)*

Submitters from the Tertiary Education representative body, ITP and PTE sub-sectors suggest additional information be included in the information set. These suggestions range from future labour force demand, ethnicity of current students, other skills required, and qualitative information.

*For our domestic WPL and ILN-ESOL funded students, it is the social, cultural and micro-economic (e.g. being able to apply for a promotion) outcomes they are most interested in. (PTE)*

To adequately reflect the fit for purpose principle, the information needs to be accessible to friends and family and other advisors.

### 3.4 Question 4: Benefits

As noted in TEC's consultation document, providing good information will contribute to improving the outcomes of tertiary education in New Zealand and will thus increase the tertiary sector's contribution towards New Zealand's goals and priorities. TEC identified the following intended benefits of this work:

- enabling learners to make real comparisons between qualifications and across providers when deciding on what and where to study
- providing consistency on what information is published by TEOs and by government
- facilitating informed enrolment choices that align with learners' desired tertiary education outcomes.

**56 submitters responded to the question** 'Do you agree with the intended benefits of the Information for Learners work?' As shown in Table 8, of those who answered this question, two thirds agreed or strongly agreed with the intended benefits of the work, specifically:

- 62% agree to strongly agree (5, 6, and 7 combined)
- 13% Neutral (4)
- 19% disagree to strongly disagree (1, 2, and 3 combined)
- 7% don't know.

**Table 8: Do you agree with the intended benefits of the Information for Learners work?**

Submitter response		n=56	n=56	n=56	n=56
Base: all submitters who answered the question		No.	%	No.	%
Strongly agree to agree	7	18	32%	35	62%
	6	9	16%		
	5	8	14%		
Neutral	4	7	13%	7	13%
Disagree to strongly disagree	3	1	2%	10	19%
	2	7	13%		
	1	2	4%		
Don't know	Don't know	4	7%	4	7%

Analysis by submitter group (refer Table 9) highlights broad agreement with the benefits with the exception of universities who mainly disagree and around half of the PTEs who are neutral or disagree.

**Table 9: By submitter groups: Do you agree with the intended benefits of the Information for Learners work?**

Submitter response Base: all submitters who answered the question		PTEs n=20	ITPs n=15	Uni n=5	TE Reps n=3	Learner groups n=2	Other n=11
Strongly agree to agree	7	6	7			2	3
	6	2	3	1	1		2
	5	4	2		1		1
Neutral	4	4	1				2
Disagree to strongly disagree	3	1					
	2	2	1	3	1		
	1	1					1
Don't know	Don't know		1	1			2

## Feedback on the benefits

**24 submitters responded to the question** 'Please comment below if you think there are other benefits that need to be considered as part of this work or if you have any general comments on the benefits of the Information for Learners work.'

Submitters did not suggest other benefits to the Information for Learners work. Comments received qualify agreement or disagreement ratings with the intended benefits of the Information for Learners work.

Submitters from ITPs and PTEs and one university submitter agree in principle with the benefits. Those who agree in principle also acknowledge they do not agree that the Information for Learners work will realise these benefits.

Reasons for disagreement with the benefits by universities, PTEs and a government agency ranged from no benefit as information is already provided, conflicts with academic freedom and the government's role in providing this information.

*Shouldn't the market (students, industry, other stakeholders) determine its own information needs rather than a Government bureaucracy (the TEC) attempt to anticipate what those needs might be. (University)*

Submitters' comments to this question reflect their concerns about the focus of the Information for Learner's work, as well as data validity and comparability.

### Too much emphasis on graduate economic information

Some ITP and PTE submitters and one university submitter comment the emphasis on graduate economic outcomes could unfairly influence learners' decision making process. As one PTE submitter explains:

*There is a danger that learners are steered away from a career pathway, in which they have a distinct aptitude, by seemingly more lucrative career options via the median earnings section. (PTE)*

Further, a few submitters from the ITP, Tertiary Education representative body and PTE sub-sectors note that learners make decisions based on broader considerations such as lifestyle and aptitude, and not solely on economic outcomes for graduates.

A few submitters in the ITP and Tertiary Education representative body sub-sectors are concerned that the instrument may be used by the government to determine funding allocation.

*If the intent is that this information is to be used in any funding or other policy decisions it should be mentioned here so it is clear for providers. (Tertiary Education Representative Body)*

### Validity of data collection process queried

Some submitters from the PTE, ITP and Tertiary Education representative body sub-sectors did not trust the data collection process due to issues with either the TEC's proposed methodology, or the inability of TEOs to gather and report accurate data.

*How will there be assurance around reliability of tracking data? If one TEO has a 20% response to tracking information and another 90%, the comparison is not statistically significant. (PTE)*

### Valid comparability across TEO sub-sectors not possible

Some ITP, PTE, and university submitters contend that the benefits of the Information for Learners *work* will not be possible due to proposed data not being directly comparable across TEOs. One ITP comments

*In principle the concept of providing sound information for students is a good one, however there needs to be a comparable base for this. (ITP)*

If the data is not directly comparable, the information provided will be misleading to learners, thereby hindering their decision making.

### 3.5 Question 5: Key information set

TEC put forward a proposed key information set comprising of four elements, each of which contains specified information categories for consideration by submitters. In summary, these are:

- Access and pathways: Minimum entry requirements
- Costs of study: Government subsidy; Student contribution; How to access loans and allowances
- Learner engagement and success: Retention and completion rates
- Expected outcomes of study: Employment rate of graduates; Graduates progressing to further study; Graduate earnings.

TEC noted that the proposed key information set is intended as a starting point and does not cover all the information that prospective learners may want to inform their enrolment choices.

**56 submitters answered the question** ‘Do you think the TEC’s key information set covers the necessary information categories to deliver on the objective of strengthening the information content?’

As shown in Table 10, of those who answered this question, submitters are polarised. Four in ten agree that TEC’s key information set covers the necessary information categories to deliver on strengthening the information content, and 42% disagree.

- 38% agree to strongly agree (5, 6, and 7 combined)
- 16% neutral (4)
- 42% disagree to strongly disagree (1, 2, and 3 combined)
- 5% don’t know

**Table 10: Do you think the TEC’s key information set covers the necessary information categories to deliver on the objective of strengthening the information content?**

Submitter response		No.	%	No.	%
Base: all submitters who answered the question		n=56	n=56	n=56	n=56
<b>Strongly agree to agree</b>	7	7	13%	21	38%
	6	8	14%		
	5	6	11%		
<b>Neutral</b>	4	9	16%	9	16%
<b>Disagree to strongly disagree</b>	3	6	11%	23	42%
	2	11	20%		
	1	6	11%		
<b>Don’t know</b>	Don’t know	3	5%	3	5%

Analysis by submitter group type (refer Table 11) reinforces that opinion is divided. PTEs, ITPs, and Other groups are divided with around equal amounts of submitters agreeing with the key information set covering the necessary information than are neutral or disagree with this statement. In contrast, Tertiary Education representative bodies and universities are more likely to disagree, and learners groups more likely to agree.

**Table 11: By submitter groups: Do you think the TEC’s key information set covers the necessary information categories to deliver on the objective of strengthening the information content?**

Submitter response Base: all submitters who answered the question		PTEs n=20	ITPs n=15	Uni n=5	TE Reps n=3	Learner groups n=2	Other n=11
Strongly agree to agree	7	4	2			1	
	6	1	3	1		1	2
	5	2	2				2
Neutral	4	4	2		1		2
Disagree to strongly disagree	3	1	4		1		
	2	5	2	3	1		
	1	3					3
Don't know	Don't know			1			2

## Feedback on the key information set

Submitters were asked to comment on other information areas to consider, and to give general comments on the key information set.

### 40 submitters gave feedback on the key information set.

Submitters responded with general comments and suggestions on the key information set proposed. Mainly, submitters comment on the relevancy of the information categories in the specific information areas, the narrow range of variables used and their lack of comparability across diverse TEOs and learners.

### General comments on the key information set

Some submitters, including one other government agency, emphasise their general support for the dissemination of robust and useful information to learners and information seekers, though note some issues with the direction of the work in general, or specific components of the key information set. One other government agency submitter states:

*We support the development of a learner rating of the provider/course within the final product as this will also contribute towards better decision-making and a responsive education/training industry. (Other)*

A few submitters reiterate their disagreement with the key information set as it stands.

Some ITP, PTE, Tertiary Education representative body and Other submitters note the information included in the key information set may be **confusing and potentially misleading for learners**. Some submitters from the PTE, ITP, and Tertiary Education representative body sub-sectors contend there is **too much complex or irrelevant information** is provided in the key information set.

A few university and PTE submitters suggest learners are interested in **broader information categories** including programme structure and student-to-teacher ratio, location, social and cultural considerations, and wider outcomes of the qualification and not solely economic outcomes.

*TEC's proposed key information set is very narrowly economic and does not respond to the wider and evidenced information needs of prospective students and their families. (University)*

Some submitters from the ITP, PTE and Other sub-sectors propose the **inclusion of additional information** in the key information set. These include demographic of student body (age, ethnicity, part-time vs. full-time); delivery mode (distance learning, online, extra-mural), EER rating; and date fields to better inform learners' decision making process.

A few submitters suggest the inclusion of **broader information categories will better represent the diversity of study offered** by tertiary education providers. One university submitter contends:

*The information for Learners project seeks to make more comparable simplistic, blunt and narrow standards that do not reflect the complex nuances of individual qualifications and individual TEOs. (University).*

One PTE and a few ITP submitters acknowledge the **difficulty posed for TEOs in obtaining some of the requested data**. They also suggest the TEC play a leadership role in data collection to ensure consistency between reporting by providers.

### **Access and pathways: information already available**

A few PTE and Other submitters note **minimum entry requirements are already available** for learners, and generally found on TEO websites. Thus the Access and Pathways information area is irrelevant.

One Other submitter requests **standard formatting for displaying the minimum entry requirements**. One Other submitter acknowledges the minimum entry requirements differ between programmes, and may have complex and lengthy requirements. This submitter suggests:

*It may be preferable for this part of the standard information template to simply link to a clear explanation of requirements on the TEO's website. (Other)*

Submitters from the Tertiary Education representative body, PTE, and Employer sub-sectors propose **additional information about entry requirements** be included in the Access and pathways information area. Suggestions range from special forms of entry for priority groups, pathways for learners who do not meet minimum entry requirements, to occupational licensing and certification requirements for entry into vocations and trades.

### Costs of study: government contribution irrelevant, information available already and not all costs noted

Submitters across the Tertiary Education representative body, university, ITP, PTE sub-sectors and one Employer comment that the **inclusion of government contribution information is not relevant to learners**. It is their view that this information is not actively sought by learners, and would only confuse or mislead them.

Some PTE, ITP, university, Tertiary Education representative body, Other and Employer submitters note that the **student contribution information category is already provided by TEOs** and it does **not reflect the full costs of study** to the learner (i.e. living away from home).

Additionally, one Tertiary Education representative body notes that tuition fees can vary within programmes based on part-time versus full-time study or combination of papers taken within the programme of study.

*As a result the fees for each qualification would need to be displayed as an indicative range as the government subsidy and student contribution are paper-based and there could be significant variation within a single qualification.  
(Tertiary Education representative body)*

### Learner engagement and success: lack of comparability of the qualification completion and retention data

University, Tertiary Education representative body, PTE, ITP and Other submitters, including one Employer, contend that the **use of the retention and qualification completion information categories in the learner engagement and success information area is not useful** as it does not accurately reflect TEOs' performance. These information categories are therefore not relevant or meaningful for learners.

Of these submitters, a few note that **qualification completion and retention data is not comparable** across TEO sub-sectors where programmes are subject to different time and other variables. One ITP submitter notes of qualification completion rates in particular that:

*This measure is impacted by so many variables such as length of programme, whether the programme is in start-up phase or close out phase, whether the programme has reached steady state, regional differences in student cohort, degree of part-time study, that data will vary from year to year and it will be difficult to see how useful information can be drawn from it for prospective students. (ITP)*

### Expected outcomes of study: relevancy and meaningfulness of information categories

Submitters across PTE, Tertiary Education representative body, ITP and Other groups **object to the inclusion of graduate employment information** in the expected outcomes of study information area because it does not account for other factors such as range of employment field, transferability of skills.

*The broad sector definitions do not accurately portray employment rates, study progression and potential earners for specialist providers servicing niche areas of the larger sector. (PTE)*

A few submitters from Tertiary Education representative body, university, PTE and ITP and Employer sub-sectors note that **too many factors influence graduate earnings information for it to be useful to learners.**

For a few ITP, Tertiary Education representative body and Other submitters the Expected outcomes information area should **only include graduate employment data on graduates who are employed in fields relating to their study.** Otherwise this is misleading to learners and information seekers. As one ITP notes:

*Employment rates are misleading as often students are not employed in an area related to their study. Employment as a measure, is of most value to a prospective learner if it reports employment in a sector related to their study. (ITP)*

In addition, a few PTE and Other submitters, and one ITO submitter comment that the **expected outcomes information area is largely not applicable to those learners already employed.** For PTEs in particular this renders this information area irrelevant and meaningless for a large cohort of their target audience.

*Most of our learners are already employed (but under employed due to the limitations placed on them by their language and literacy deficits) therefore graduate destinations information is not relevant to our cohort. (PTE)*

A few submitters request the sample size for graduate employment information should be more than two years.

Some submitters from the PTE, Tertiary Education representative body, university sub-sectors and one Employer acknowledge the limitations of the Expected outcomes information area due to the **inability to show overseas graduate employment.** This may skew the data and unfairly disadvantage some TEO sub-sectors.

*For example, the graduate from several of our members are in high demand in America for hi-tech creative technology and art companies. Many move into highly paid jobs there at a young age. The median salary of their New Zealand graduates would greatly understate the actual median salary of their graduates. (Tertiary Education representative body)*

A few submitters (ITP, Other and Employer) suggest graduate employment and further study data should be combined to show an overall picture of graduate outcomes.

#### **Other comments: information content suggestions**

One submitter suggests **industry satisfaction** be included as an information category in this information area. Another submitter (from the universities sub-sector) suggests **student satisfaction measure** be developed and included in the key information set.

*There is no standard universal measure for student satisfaction or engagement currently in NZ; this would need to be established. At the moment, the AUSSE is probably the closest tool we have with measuring student experience and engagement, but this has its limitations as well. (University)*

### 3.6 Question 6: Improving information delivery

**56 submitters answered** the question 'Do you think that the TEC's proposal for information to be published by the TEOs and centrally fulfils the objective of improving information delivery so that it is useful and accessible to prospective learners?'

As shown in Table 12, of those who answered this question, opinion is polarised with a four in ten disagreeing and a third agreeing that TEC's proposal for information will improve information delivery so that it is useful and accessible to prospective learners.

- 36% agree to strongly agree (5 and 7 combined)
- 16% neutral (4)
- 44% disagree to strongly disagree (1, 2, and 3 combined)
- 5% don't know

**Table 12: Do you think that the TEC's proposal for information to be published by the TEOs and centrally fulfils the objective of improving information delivery so that it is useful and accessible to prospective learners?**

Submitter response		No.	%	No.	%
Base: all submitters who answered the question		n=56	n=56	n=56	n=56
Strongly agree to agree	7	9	16%	20	36%
	6	-	-		
	5	11	20%		
Neutral	4	9	16%	9	16%
Disagree to strongly disagree	3	7	13%	24	44%
	2	11	20%		
	1	6	11%		
Don't know	Don't know	3	5%	3	5%

Analysis by submitter group type (refer Table 13) highlights that opinion is divided.

- Two thirds or more of PTEs and ITPs are neutral or disagree that TEC's proposal for information will improve information delivery so that it is useful and accessible
- Universities mainly disagree
- Tertiary Education representative body submitters mainly disagree
- Learner groups in contrast agree.

**Table 13: By submitter group: Do you think that the TEC's proposal for information to be published by the TEOs and centrally fulfils the objective of improving information delivery so that it is useful and accessible to prospective learners?**

Submitter response Base: all submitters who answered the question		PTEs n=20	ITPs n=15	Uni n=5	TE Reps n=3	Learner groups n=2	Other n=11
Strongly agree to agree	7	3	2			2	2
	6						
	5	3	4	1	1		2
Neutral	4	4	3				2
Disagree to strongly disagree	3		3		1		2
	2	5	3	2	1		
	1	4		1			1
Don't know	Don't know			1			2

## Feedback on delivery of information

Submitters were asked to comment on whether the TEC's proposal for information to be published by TEOs and centrally fulfils the objective of improving information delivery so that it is useful and accessible to prospective learners.

**35 submitters** gave feedback on the delivery of information.

In the main, submitter responses reflect concerns about TEO compliance in data collection and publication; issues with relevancy and accurate presentation of information; and the exclusion of certain population groups.

Some submitters across the PTE, ITP and Other groups express their satisfaction with the TEC proposal to deliver on Objective 2 by publishing the information both centrally and on individual TEO webpages, though note some concerns (which are explored below).

### Issues with TEO compliance costs in data collection and publication

Some submitters from ITP, PTE, and Tertiary Education representative sub-sectors and one Other submitter acknowledge the **significant cost involved in TEO compliance with data collection**. These submitters also question the feasibility of obtaining accurate and timely information, citing issues with consistency of data collection methodology across

TEOs and challenging nature of TEOs having to monitor changes in data on a regular basis.

*We are aware that most of the information currently collected by government agencies on such matters as employment and salaries is several years old once synthesised so if government agencies can't gather accurate and current information, it is unlikely that TEOs with their limited resources will be able to. (ITP)*

Some ITP, Other, Tertiary representative body and one other government agency submitter **suggest a central agency should lead the data collection process**. A few of these submitters recommend the process be audited to ensure accuracy and consistency. A few submitters from across the Other, Tertiary education representative body, PTE and University sub-sectors (including one other government agency) note this information is largely already provided by TEOs or by Career NZ on their website.

### **Irrelevant and inaccurate presentation could result in misleading information**

Some University, ITP and PTE submitters note the **lack of direct comparability of information which may result in some providers within the ITP and PTE sub-sectors being misrepresented** (especially smaller TEOs). One ITP submitter suggests there should be flexibility in the publication specifications to allow TEOs to adequately represent their organisation by not displaying irrelevant information (because the information was not able to be collected as it did not apply to that particular organisation). Qualification completion and retention rates, and graduate employment outcomes in particular were identified as information areas that could misrepresent TEOs.

*If a TEO is attracting at risk students who have generally underperformed in the education system then the TEO may have lower overall rates of course completion and retention but is having a positive influence on at risk young people. (PTE)*

Some submitters from the ITP, PTE and Tertiary Education representative body sub-sectors note that the **prescribed information is not relevant or meaningful to learners, or does not represent the total decision-making process**. A few submitters from the ITP, PTE and University sub-sectors contend there is too much information to be published and it is too complex. These submitters suggest keeping the key information set brief and simple. Of these submitters, a small number suggest additional information or alternative ways for data to be presented (i.e. employment and further study rates from the past 10 years combined; averaging student contribution, qualification completion rates, retention rates; inclusion of Industry satisfaction).

### **Proposed delivery format risks exclusion of certain population groups**

Some submitters from across the ITP, PTE, Tertiary representative body and Other groups comment that this information likely has utility for a certain population of learners and would **not be relevant for a diverse section of learners**. Part-time learners, those older than the proposed graduate age brackets, and prospective international students are among learners that make up target audiences of PTEs in particular. By excluding these population groups, it would disadvantage particular TEO sub-sectors.

*This is very focused on general university and polytechnic age demographic. For many PTE's that deal with disengaged learners and learners from lower socio-*

*economic communities, the ages and the level of study varies significantly from traditional public sector tertiary students. (PTE)*

Additionally, a few submitters from the PTE sub-sector contend that the publication of **information in an online format does not meet Objective 2** because it will not be useful to certain groups of prospective learners. These submitters note that some learners do not have Internet access or are not confident with navigating the internet (foundation and older learners, non-english speakers). A few ITP and PTE submitters suggest the information should be made presented in a variety of ways and made available in other formats.

*In the interests of usability, relevance of information and student experience (of which we place a very high emphasis on) we would prefer that due to our unique distance learning nature TEC provide the information that is needed to be made available to students, and organisations are able to work with students and user experience designers to determine the best way to provide this on individual websites. (ITP)*

### 3.7 Question 7: Presentation and publication specifications

TEC proposes a common set of publication and presentation standards are developed and followed by TEOs. In summary, the proposed specifications are:

1. The key information set published should fit the description of information, wording, data source and level of publication detailed in consultation document.
2. Information should be provided on the webpage alongside each specified qualification.
3. Information should be presented in the standard format and structure without the inclusion of additional explanatory information.
4. Information should be prominently positioned.
5. Information should be updated as newer information becomes available.
6. It should be stated that all fields in the key information set relate to domestic learners only.
7. Graduate destinations information should be provided with noted caveats.
8. Graduate cohort year should be provided for destinations information.
9. It should be explicit that destinations information relates to young domestic graduates.

**56 submitters answered the question** ‘Do you agree with the presentation and publication specifications of the key information set?’

As shown in Table 14, of those who answered this question, only a quarter agree or strongly agree with the proposed presentation and publication specifications, a third are neutral and four in ten disagree, specifically:

- 25% agree to strongly agree (5 and 7 combined)
- 32% neutral (4)
- 39% disagree to strongly disagree (1, 2 and 3 combined)
- 4% don't know.

**Table 14: Do you agree with the presentation and publication specifications of the key information set?**

Submitter response Base: all submitters who answered the question		n=56	n=56	n=56	n=56
		No.	%	No.	%
Strongly agree to agree	7	9	16%	14	25%
	6	-	-		
	5	5	9%		
Neutral	4	18	32%	18	32%
Disagree to strongly disagree	3	5	9%	22	39%
	2	8	14%		
	1	9	16%		
Don't know	Don't know	2	4%	2	4%

Analysis by submitter group (refer Table 15) highlights:

- Two thirds or more of PTEs and ITPs are neutral or disagree with the presentation and publication specifications
- Universities mainly disagree
- Tertiary Education representative body submitters are mainly neutral
- Learner groups in contrast agree with the presentation and publication specifications.

**Table 15: By submitter groups: Do you agree with the presentation and publication specifications of the key information set?**

Submitter response Base: all submitters who answered the question		PTEs n=20	ITPs n=15	Uni n=5	TE Reps n=3	Learner groups n=2	Other n=11
Strongly agree to agree	7	3	4			1	1
	6						
	5	1	1	1		1	1
Neutral	4	8	4		2		4
Disagree to strongly disagree	3	1	1	2			1
	2	3	3	1	1		
	1	4	2	1			2
Don't know	Don't know						2

## Feedback on the presentation and publication specifications

Submitters were invited to comment on the presentation and publication specifications.

### 37 submitters gave feedback on the specifications.

A few submitters describe the specifications as clear and easy for learners to compare.

*I like the way the presentation is very prescribed so that for at a glance information it is easy to make comparisons. (ITP)*

However, most submitters who comment reiterate concerns with the specification including that it does not encompass the sectors' complexity, feasibility of data collection, accuracy and comparability of data, and cost to TEOs.

### Presentation too simplistic and prescriptive

ITPs and PTEs in particular as well as university and Other submitters perceive the proposed presentation of information as **too simplistic and prescriptive** to enable provider differentiation. As a result these providers do not believe the presentation will enable learners to make an informed study decision.

ITPs, PTEs, Tertiary Education representative bodies, Other and university submitters highlight the following limitations of the presentation: not taking into account the whole of decision-making process (e.g. location, lifestyle, delivery, class size, pastoral care); not

recognising that other key influencers in the decision process require information (i.e. family and friends), the exclusion of population groups specifically international students, and no measure of student satisfaction or engagement.

*The example provided is a very prescriptive and structured presentation of information. We don't feel this provides the flexibility to provide students with all the information they need to help enable a successful study decision, and excludes learning and learner context, both of which are very significant. (ITP)*

ITPs, universities and other submitters agree with the inclusion of entry requirements, learner fees (excluding the government subsidy as this is likely to be confusing for students), and student progression. For submitters the **key areas of dispute** (noted mainly by ITPs, universities and Other submitters) are **graduate destination and earnings** due to the likelihood of incomplete data and inability to directly compare data across TEOs. For **completion and retention data** it was queried whether this should be national, regional or TEO average to enable meaningful comparison.

*The Qualification Completion indicator is subject to fluctuations based on provision and pipeline and cannot be trusted as an accurate reflection of quality on a consistent basis... There will be instances when this indicator will be over 100%, which just looks nonsensical and would make people think the data is questionable... NZ Grad Destinations: The issue we have with this section is that while the information is across all institutions, while some TO graduates may be a lot better than a national median if they provide niche provision for a high regional employer market. It is worthwhile considering if the information presented was on a regional basis? (Other)*

Further, one submitter comments whether the language used (e.g. retention) will be meaningful to students.

*Question the relevance of the Government contribution being displayed. In our view this could confuse prospects/applicants, resulting in additional inbound queries. In an applicant-centric approach, only what they will have to pay should be displayed. (University)*

ITPs are also **concerned that the focus is on students under the age of 25** thus excluding vocational learners. Some note the current presentation will require TEOs to add explanatory notes for the data to be meaningful to learners and this is likely to create confusion and is contrary to the design principles.

A more **learner-centric approach** is recommended by a number of submitters. To address these limitations one other government agency suggested:

*Taking a learner-driven approach to information... to consider presenting data in relative categories or bands rather than numbers. (Other)*

### Publication challenges: feasibility, costs and need for central management

ITPs, PTEs, university, Tertiary Education representative body and Other submitters note that **obtaining and maintaining timely and meaningful data is not feasible especially for graduate outcomes data.**

Further, they note the **TEC proposal is silent on the costs to TEOs** to maintain up-to-date data on their websites. Again ITPs and university submitters highlight that much of this data is already available and provided by the TEO. Given this, submitters across the board are advocating for standard template to be provided by TEC for the presentation of information. Ideally the information will be presented on central website maintained by a government agency to ensure currency, accuracy and comparability of data.

*It is also highly likely that making this information available in a central place (CareersNZ) etc would be more cost effective than burdening every TEO with the development and maintenance costs. There also needs to be allowances for describing any variances in the information - small cohorts or changed programmes can have significant impacts on much of the data, and this context is important for readers to understand. TEOs should also be allowed to publish employment outcome information relevant to them where applicable rather than just the national set. (ITPs)*

**Access issues for low-literacy learners** were also raised by ITPs especially their ability to access information from the Internet.

### 3.8 Question 8: Other comments, considerations and issues

**35 submitters** answered the question 'Is there anything else you would like to add?'

A few submitters used this opportunity to acknowledge and support the utility and intended benefit of the Information for Learners work.

*Providing learners with accurate information in which to base their study pathway decisions is an extremely important objective and one that all providers should be attempting to achieve. This will result in higher successful outcomes and retention statistics as learners will make an educated choice on a pathway that suits their needs and ambitions. (PTE)*

In general, comments made tend to reiterate previous concerns raised relating to the intent and design of the Information for Learners, its proposed implementation process, and submitters request to be involved in the working group.

#### Design issues mask utility of Information for Learners work

A few submitters comment that **given the complexity of the sector, the Information for Learners work, while laudable, is not workable** and will not offer enough value given the work and costs involved (ITPs, PTEs, Tertiary Education representative body).

Submitters (including ITPs, PTEs, university, Tertiary Education representative body and Others) comment that **measures adopted need to be accurate and robust, reflect the diversity of the sector and allow for meaningful comparison across TEOs**. Some note that comparative information can be misleading and may have negative implications and impact for smaller TEOs due to data variability relating to their relatively small number of learners.

Specific feedback about the proposed information set includes:

- The information set does **not accurately reflect the diversity of providers and learners** in certain TEO sub-sectors, and the breadth of TEOs contribution to graduate education (ITPs, PTEs, university, Tertiary Education representative body and Others)

*The data proposed gives a very narrow view of our educational delivery. We would propose that there is a separate working group of PTES with Level 1-3 courses which would include foundation learner on the panel. We found the survey questions to be stacked in favour of the proposal. We are concerned that this proposal will go ahead regardless of our feedback. It would seem easy to ramp up the programme information requirements but we contend this is not relevant to foundation learners. (PTE)*

- **Selected information set excludes certain population groups** (e.g. vocational learners) and thus the set has limited value (ITPs, PTEs, and Employer)

*The proposal provides a very generic view of the marketplace that is more relevant for traditional tertiary pathways, and does not address access and the decision making process of potential learners that are categorised as NEET. The proposal also excludes international learners, which in our view has greater issues in terms of misinformation and false advertising. Many of the statistics proposed can be misleading, are not comparable across the sector, and are not*

*representative of the quality, the environment, or the suitability of a particular provider based on individual learner needs or background. (PTE)*

- **Graduate employment outcomes indicator is not relevant** as they do not accurately reflect TEO performance (ITPs, PTEs, Tertiary Education representative body and Others)
- **Other important factors influencing decision making process are not included** such as curriculum opportunities, pastoral and learning support, friends and family influences, location, organisation's reputation, and what to study (ITPs, PTEs, university, Tertiary Education representative body, Employer and Others).

### **Costs and process issues in data collection undermine information quality**

The **challenges relating to the TEOs collecting and maintaining the information set** are noted together with **who will meet the associated costs** of this additional work for TEOs. Ensuring consistency of data collection and data quality are critical considerations to address to prevent data being inappropriately manipulated (ITPs, PTEs, university, Tertiary Education representative body, Employer and Others). Some submitters proposed that government agency should hold and manage the data centrally.

*Providing the data suggested for student contribution, qualification completion rates and retention rates will entail a significant compliance burden/resource cost for universities. It would be more cost effective, accurate and safe (from potential gaming) if the TEC held this data centrally, with the various datasets averaged, and with the individual university web pages hosting clearly identified links back to the central resource. We note that this is the case with the British and Australian systems the consultation paper cites as benchmarks. (University)*

### **Submitters across TEO sub-sectors interested in Working Group**

Some ITPs and Other as well as a PTE, a university and an Employer comment that they would like to be included in the proposed working group. Submitters also note that it will be **important to include learners and their family on the working group**, especially tertiary priority learners.