AKO AOTEAROA
NATIONAL CENTRE FOR
TERTIARY TEACHING
EXCELLENCE

Submission on *Information For Learners: Publishing information to inform enrolment decisions*

Introduction

1. Thank you for the opportunity to comment on the consultation document *Information For Learners: Publishing information to inform enrolment decisions*.

2. Ako Aotearoa: The National Centre for Tertiary Teaching Excellence is an independent organisation funded by the government and contributions from the tertiary education sector, to support the best possible outcomes for tertiary learners. We do this through supporting change projects, providing professional development, and leading discussion in the sector on key strategic issues. Our focus lies across the entire tertiary system, from postgraduate research degrees to fundamental skills and 'second-chance' learning, and involves all aspects of tertiary education that support good learner outcomes, including teaching, transitions, and organisational quality.

3. We have divided our submission into overarching general comments, and those relating specifically to the proposed key information elements and components.

General Comments

4. Ako Aotearoa welcomes the Tertiary Education Commission's decision to look at the question of learner information and decision-making. A high quality education system must support learners to make educational decisions that best align with their personal, educational, and career goals. We would be very willing to participate in or support the working group to progress this workstream.

5. For simplicity's sake we will refer to information for learners in this submission. However, it is important to recognise that the audience for this information is not just learners. As the report recognises on p12, learner decision-making is inevitably influenced by a range of networks including family, whanau, and community. These can be powerful tools for supporting good learner decisions if members of these networks, such as parents, partners, or influential members of a learner's aiga or community, have access to relevant information.

6. The discussion document does raise unanswered questions around implementation – for example, it appears from the discussion on pp15-16 that the TEC will set requirements related to the design and structure of TEOs' web presence – but we recognise that these are issues more properly discussed during the working group phase.

7. The four principles laid out on p9 of the document provide a good framework for thinking about information for learners. In particular, the notion of 'fit-for-purpose' information must be the guiding principle for this work. It does not matter whether information is presented in accessible ways and is consistent across TEOs if it is not the *right* information for learners, their families, and communities.

8. We recognise that this is a difficult area in which to work, and believe the TEC has developed a good starting point for discussing the information learners require. However, we would emphasise a fifth principle related to that of fit-for-purpose

information: *information must not be presented in such a way or rely on such measures that it could mislead learners.* As discussed later in this submission, we believe that some elements of the proposed approach have the potential to mislead learners and thereby undermine good decision-making.

Problem Definition

9.   We do have some concerns at the implicit problem definition driving this work. In a constrained financial environment for both government agencies and TEOs, it is important that resources are directed where they can have the most benefit for learners. A strong problem definition and/or needs analysis is key to ensuring this is the case.

10.   In this context is important to recognise that the core issue here is the ability of learners to make decisions that support their goals. This work must a) be driven by how well this information supports such decisions (rather than what information is easily available or useful for monitoring), and b) be treated as only one strand within a broader work programme on learner decision-making. Otherwise, there is a risk of this work failing to add meaningful value to the TEC, the sector, and most importantly to learners.

Learner Leadership

11.   Fundamental to the fit-for-purpose principle is that this workstream must be guided by the needs of learners rather than TEOs or government agencies. Learners themselves are best-placed to identify and understand the information that they require, and learners must therefore drive the decisions and activities of the working group. As Ako Aotearoa has previously noted,[1] active learner engagement is a characteristic of good quality tertiary education and this applies at the level of national policy development as well as at individual TEOs.

12.   Ideally this would be achieved by partnership; for example, this work programme could be co-led by the TEC and a learner organisation. If this is not possible, the work must still involve active engagement with these organisations including a very strong learner presence on the working group. This must include involvement of the New Zealand Union of Students' Associations (NZUSA) and Te Mana Ākonga, as well as other groups and types of learners such as:
   a.   Specialist student bodies (e.g. the New Zealand Law Students Association and the New Zealand Medical Students Association).
   b.   Learners in the PTE and industry training sectors.
   c.   Priority and distinctive learner groups, such as Pacific learners, mature learners, and learners with disabilities.

13.   We also recommend that these organisations and representative structures be used to test the assumptions and proposals of the working group and TEC – for example, through NZUSA's Regional Learner Representative Panels.

Learner Context

14.   Also key to the principle of fit-for-purpose information is recognising that different qualifications serve different learner groups and different learner needs. For example, industry training programmes serve people who are already in employment, degree-level learners are predominantly young and transitioning directly from secondary school, and foundation certificates are aimed at a range of people who need additional education to develop a learning and career pathway.

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[1] See *Student Voice in Tertiary Education Settings: Quality Systems in Practice* (Heathrose, 2013).

Fit-for-purpose learner information is information that will be relevant to the learners in a qualification.

15. We are therefore concerned that this work appears to have been developed around the context for young learners experiencing straightforward transitions from upper secondary school into university study. We highlight specific examples of this later in this submission, including many indicators being not applicable to industry trainees and outcome data being misleading for many non-degree programmes. This is particularly important given that learners who are not following a 'traditional' university-based pathway may be those who are most in need of better information.[2]

16. It is also important to note that while the meaning of information may seem clear from the perspective of a central agency or a TEO, this can be informed by a significant amount of contextual knowledge. It may not be as comprehensible to, for example, a 'first-in-family' learner with less comprehensive knowledge of the education system, policies, and/or the labour market. This is true of both information and the caveats on this information. It is therefore critical that the final proposed information set is formally tested and evaluated for both relevance and usability with a wide range of learners.

17. Similarly, what is useful information for an analyst or a TEO manager may not be useful to a learner and it is learner need which must drive this work. This relates not just to the types of information, but how it is communicated. For example, from a monitoring perspective it is useful to know precise values for many quality-related measures but for a learner these are less important than the broad indication of quality that they provide. The difference between programmes with 85% and 80% completions, or two with 40% and 35%, are important to a provider trying to improve performance. From a learner perspective, however, in the first case they can be assured that they have a good chance of completing either programme,[3] while in the second the programme with a 40% completion rate may be of notionally higher quality than one with 35%, but in both cases the likelihood of completion are low.

18. Taking a learner-driven approach to information in this regard means that it would be worthwhile to consider presenting data in relative categories or bands – as the Ministry of Business, Innovation and Employment does with its *Occupation Outlook* tool – rather than as numbers. For example, a programme might be rated as having 'very high' completions (say above 90% or in the upper quartile), 'low' completions (say less than 50% or in the lower quartile) or being around average. This makes data intelligible to a learner in a way that is more relevant and requires little extra contextual information to understand, and also avoids extensive debates over specific values and how accurate they may be.

Links With Other Government Work

19. It is important that this work is undertaken with full regard to current changes in the tertiary sector and information tools that already exist – particularly those aimed at learner decision-making. However, the document refers only to the Tertiary Education Strategy, TEC documents, and system-level monitoring reports, and there is little discussion of how the proposals in this document relate to work currently or recently undertaken by other agencies.

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[2] A key rationale for the development of Vocational Pathways was that the degree/ university pathway is comparatively well-communicated to learners.

[3] And consequently learners could reasonably place more importance on other factors when choosing between them (such as cost of living, social and community connections etc.).

20. In particular, Careers NZ maintains a significant amount of information similar to that proposed in the document, and it is unclear how the TEC envisages its proposals linking to those tools. For example, the proposed 'Graduate Destinations' information is already available in the Careers New Zealand *Compare Study Options* interactive tool, which provides a more direct way of comparing this information between different options than requiring the learner to access multiple individual programmes.

21. There also appears to be no link between this work and the NZQA-managed Review of Qualifications. The document appears to have been prepared on the basis of TEOs structuring their offerings to learners around qualifications. However, while this will continue to be true for at degree level and above, it is unclear whether the authors fully appreciate the changes that will occur at levels 1-6 of the Qualifications Framework. Notable points here include:
    a. A shift from 'qualifications' to 'programmes' as the primary offering of TEOs.
    b. Increased qualification flexibility, with multiple different methods of achieving the same graduate outcomes.
    c. A greater emphasis on clear education and employment pathways.
    d. All current qualifications at levels 1-6 being removed from the framework and replaced with new qualifications.

Proposed Key Information

22. The broad division of necessary learner information into 'access and pathways', 'costs of study', 'learner engagement and success', and 'expected outcomes' is appropriate. We do note, however, that there is no discussion here of support for learners – this includes both financial support beyond student loans (e.g. scholarships, specific funding) and other schemes available to support learners (e.g. the University of Auckland's MAPAS Scheme). This will also inform learner decision-making and thought should be given to how it can be included.

23. This information needs to be available specifically with regard to Māori and Pacific learners – particularly success and outcome data. The differences in outcomes for these learners is well known, and it is important that these learners understand how effective a given programme is likely to be at supporting success for them. Given the current *Tertiary Education Strategy*'s focus on young people, this should also be available in relation to learners under 24.

24. We are concerned that the document does not appear to have taken account of the Industry Training sector. For example, 'student contribution' is not an appropriate term for this sector, TEC qualification completion and student retention EPIs are not used for ITOs, and generic employment and further study outcome statistics are of questionable relevance. If this work is intended to not apply to ITO programmes, it would be helpful for this (and the rationale) to be clearly stated.

25. We also note that the document does not discuss how the proposed information might relate to NCEA where such programmes are offered by a TEO.

Access and Pathways

26. Entrance requirements are an obvious example of important information for learners – although it would be helpful to have a clear picture of how many learners currently find it difficult to locate this information.

27. The example given on p19 is, however, an example of a very straightforward and short entrance requirement. For some programmes – particularly those with a strong vocational or professional focus – the requirements can be quite lengthy

and may refer to specific achievement and/or assessment standards. Some programmes may also have special forms of entry for particular priority groups. 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.

Costs of Study

28. Costs of study are likewise a clear example of relevant information for learners. It is, however, important to note that in some areas – such as in foundation education – this information may vary considerably depending on the particular funding stream associated with a given learner.

29. We have some concerns about the inclusion of 'Government Contribution' in this element. The role of this information in learner decision-making is very questionable, and it seems unlikely to meet the fit-for-purpose principle. Indeed, in some cases this information may be read as a contribution provided directly to the learner and thus prove actively misleading.

30. Listing the student contribution as a total required to complete a programme is a good proposal in that it provides a true picture of the cost of undertaking study, and avoids engaging with part-time study, different course loads etc. For multi-year programmes it will need to be made very clear that this is not the *annual* cost to the learner, and also that it does not account for later changes in fees or levies.

31. We support the proposal to include the full range of compulsory costs within the student contribution. It is, however, also important to include course-related costs. In some programmes specific materials such as computer software, tools, or materials for assessments can be both costly and effectively required for success. We recognise that these may vary from learner to learner but as this can increase the cost of study by many thousands over the course of a programme it is critical that this information is available. The variable nature of these costs could be addressed by adding this as a separate element in the information set.

Learner Engagement and Success

32. The quality of a programme is the most relevant information available for most learners, and learner engagement and success measures are a good way of describing this. However, as noted earlier, it is critical that such information is available specifically in relation to Māori and Pacific learners.

33. Although qualification completion rates provide a useful proxy for quality, the methodology proposed on p18 is not an appropriate basis for this measure as it does not meet either the robustness or fit-for-purpose principles. The TEC's Educational Performance Indicators do not measure qualification completion but rather describe the ratio of completions to enrolments in a given year. This can be used for high-level system and monitoring purposes, but it is not helpful to students making decisions about where and when to study. For example, STEM programmes where enrolments are increasing in line with Government priorities will appear to have decreasing completion rates which may discourage learners. Conversely, programmes that develop a reputation for poor quality outcomes may actually see EPI-based completion rates rise as enrolments decline. It is also unclear if the authors have taken account of changes to the qualification landscape at levels 1-6 and how these might impact on EPI-based completion rates.[4] A new methodology and data source needs to be developed to support this indicator.

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[4] As part of the Review of Qualifications all current qualifications at levels 1-6 will be eliminated and replaced by new qualifications.

34. Using Narrow NZSCED fields as the basis for these calculations is also likely to be problematic. Although this level may be suitable for many degree-level and postgraduate programmes, at other levels and in some disciplines it may lead to multiple programmes being classified under the same NZSCED category (e.g. 'Building', 'Food and Hospitality', 'Performing Arts', or 'Visual Arts and Crafts' which remain relatively broad fields at this level). It is also unclear from the brief description on p18 whether providers will be expected to differentiate by NZQF level as well as Narrow NZSCED, although we assume that this is implied.

35. Beyond this, we believe that it would be worthwhile for the working group to explore how to include more sophisticated information on teaching quality, such as AUSSE (Australasian Survey of Student Engagement) scores, teaching awards etc. These provide more direct indicators of quality, and will therefore be more relevant to students' decision-making.

Expected Outcomes of Study

36. Although we strongly support the inclusion of this element, there are serious flaws with the proposed information that make the proposed indicators incompatible with the principles of both robust and fit-for-purpose information. They also do not support a pathway-based approach to education decision-making.

37. For learners to make informed study decisions, they need to be able to relate qualifications and programmes to their particular career and education goals – generic outcomes are of limited value. This notion of 'purposeful' education has previously been identified by Ako Aotearoa as a critical element of thinking about education and engaging learners.[5] The proposed indicators do not reflect this.

38. Firstly, the document does not propose including any information about the intended and relevant pathways from a given programme – for example, the careers and industries for which it prepares learners, or the further education to which it may lead. We note that as a result of the Review of Qualifications all level 1-6 qualifications are required to clearly state these. This should also include programme-specific information where possible, such as specific articulation agreements.

39. Secondly, the proposal to use generic data-sources designed for overall system monitoring as sources for information to support learner decision-making is highly problematic. Table 2 states that the TEC intends to use system-level information that relates to all qualifications of a given type (e.g. all Diplomas with an NZSCED Horticulture code). However, these measures were developed for broad analytical purposes and this generic information is not fit-for-purpose for a given learner who is making specific decisions. Individual programmes may perform significantly better or worse on a given measure than the national average, and regional labour markets can vary considerably from the national norm. It is the information relating to the specific programme of study that learners need to be able to access.

40. Similarly, although the document is partially correct when it states that learners value information on employment outcomes, a more accurate statement is that learners value information on *specific* employment outcomes *relevant to that programme*. For example, if a learner is considering whether or not to enrol in a Bachelor of Science or a Diploma in Sport and Exercise Science they would likely consider it a negative outcome if most graduates from those qualifications do not end up working in science or exercise-related occupations respectively – even if

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[5] See, for example, *Lifting Our Game* (Educational Attainment Working Group, 2012).

generic employment outcomes are high. Having occupation or industry-specific data is critical if students are to make informed, career-based education decisions.

41. In addition, as noted on pp16-17, these measures are related to 'young' graduates. However, although this may be appropriate for degree-level programmes, at other levels the definitions provided on p17 cover only a small percentage of the actual learners studying at these levels. For example, Ministry of Education data shows that the definitions given are likely to include only:[6]

   a. A little over 30% of those enrolled in Certificates.
   b. Under 36% of those enrolled in Diplomas.
   c. A little over 30% of those enrolled in Masters, and a wide variation of those in Doctorate qualifications depending on discipline (including several where no learners are in the relevant age group).

42. This means that for non-degree level study, in most cases the information provided on destination outcomes are likely to be inapplicable to around two-thirds of learners.

43. We also note that this information can be very time-sensitive. Information from a 2008/09 cohort, as used in Figure 2, has little relevance to the current labour market and has a high chance of misleading learners who use it.

44. Likewise, although progression to further study is a useful system-level measure, without additional context it is unhelpful to learners. For example, a programme may have a low progression rate because it provides all of the skills or capabilities needed for a particular pathway, or because it provides no useful basis for further progression. Conversely, a high further study rate may signify that a programme does not provide sufficient skills, that it provides a strong basis for further study, or that following a relevant career path (e.g. in the sciences) requires further study. Individual learners are likely to lack the context needed to make sense of these rates.

45. The report does note several caveats to this information on pp16-17, but we question the value of including information that requires such strong caveats. This is particularly the case given that many of those learners who would find better information most useful are also those who have the least context and lowest technical expertise to properly understand their significance.

46. We would therefore suggest that the proposed Key Information Set for this area be revised and replaced with indicators that assist learners to relate programmes and qualifications to their intended outcomes. These should include:

   • Intended academic and employment pathways from this programme.[7]
   • Coding of programmes to Vocational Pathways.[8]
   • The most common industries and occupations in which graduates from this programme are working.
   • Links to Careers NZ's *Where To Go?* tool or MBIE's *Occupation Outlook*.

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[6] *Provider-based Enrolments* (Education Counts, 2014). Note that due to the broad age categories used in that data source these figures are only approximations.
[7] The Review of Qualifications means that all qualifications at levels 1-6 will have these explicitly stated.
[8] This could also be included in the 'Access and Pathways' element.

Conclusion

47. In conclusion, Ako Aotearoa would like to reiterate our support for the TEC engaging with issues around students' decision-making and information needs. For this work to realise its value, however, it must be based on and involve:
    a. A learner-led approach.
    b. Recognition that learner information is only one dimension of learner decision-making.
    c. Recognition of the needs of and context for *all* learners, not just those transitioning smoothly into degree study.
    d. Clear alignment with work and initiatives in other government agencies.
    e. A review of the 'Student Engagement and Success' element to include a more robust measure of qualification completion and more sophisticated measures of education quality.
    f. Replacement of the 'Expected Outcomes' components with fit-for-purpose indicators that support learner decision-making.

48. We look forward to the progress of this work, and would be pleased to offer any further support or advice that would be of use.

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