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**PIR TCSI Integration Project Submission**

Thank you for the opportunity to contribute to the **TEQSA Integrating the Provider Information Request into the Higher Education Data Collection Consultation Paper**. I am pleased to attach a brief submission outlining QUT's response.

The contact for this submission is Dr John Byron, Director, Government Relations & Policy. His contact details are as follows.

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Yours sincerely,

**Professor Margaret Sheil AO**  
**Vice-Chancellor and President**



## Queensland University of Technology

### **Submission on the TEQSA Integrating the Provider Information Request into the Higher Education Data Collection Consultation Paper**

QUT welcomes the opportunity to provide input on this Consultation Paper and contribute to the development of the Commonwealth's Higher Education Data Collection processes.

Our submission provides feedback on the strategies proposed to minimise the compliance burden of providing information to TEQSA. Generally, QUT supports the streamlining and enhanced coordination between TCSI implementation and Enterprise Data & Analytics requests proposed in this paper.

As a current HELP provider who is already reporting student and completions data to the department under the *Higher Education Support Act 2003* (HESA), QUT is only required to report staff data through the Provider Information Request collection. Our response is tailored accordingly.

#### **1. For PIR providers who choose to utilise the 'Provider Portal', what other benefits or unforeseen implications that might impact your institution do you see arising with this proposed transition? How can these complications be mitigated and what viable alternatives might be a better solution?**

It is our understanding that use of the Provider Portal will remain relatively unchanged. It is also understood that the Provider Portal is utilised for PIR submissions upon request, and that PIR collection for student data does not apply to HESA organisations such as QUT. HESA organisation submissions are currently captured via HEPCAT, which will be captured via TCSI in future.

Where relevant, the implementation of the B2G API may mitigate the need for some PIR submissions.

This proposal clearly states that "All providers, regardless of what method they choose to utilise in the reporting of student data, will be required to use the Provider Portal to submit staff data through a spreadsheet submission." QUT requests clarification from the Department on whether there is a future roadmap for providers to directly submit verified staff data similar to that proposed under the TCSI initiative.

#### **2. What do you think of the proposed data schematic? Do you see any weaknesses in any of the data elements presented? Are there further things we could do to make the collection more user-friendly and efficient?**

Where data elements are derived, it would be beneficial to have transparent oversight into the way QUT-submitted data is being manipulated. Often, data verification requests require this understanding in order to compare the analysis by HEIMS/TEQSA against the data submitted to the Government.

Our review of the schematic has not highlighted any broader issues at this time, however it is not unusual for further nuances to become apparent after sustained use.

#### **3. How will the change in timing to March impact upon your institution's operations? How might these impacts be further mitigated?**

The proposal outlines that the submission period will be moved forward from August. As discussed, our student submissions are not affected by this change. However, we can comment that given the regularity of our submission to HEIMS, we would not otherwise be unfairly burdened by this

timeframe change if we were required to make a student submission. Any potential resourcing impact of this change would be mitigated by circulating reporting workload and timeline information in advance.

We understand the need to align data reporting, including aligning HEIMS data with HEDC. In the case of data aligning, we request the ability to differentiate between reporting/acquittals and the provision of estimates for future periods.

Given that current staff data submission to the Department of Education & Training takes place in June each year, there would need to be clarification of whether TEQSA will utilise staff data collected in June of the prior year, or whether the timing of staff data collection due to Government will also change.

#### **4. Are there any further data security and privacy issues around the storage of student/staff personal information collected by your institutions on cloud-based technology that you believe TEQSA should consider?**

There do not appear to be any serious privacy or data security issues with TEQSA and the Department's proposed storage of student and staff personal information in the cloud, provided the level of data protection indicated is maintained.

TEQSA advises that Cloud infrastructure will be Australian Signals Directorate certified and use best practice tools. These tools must provide adequate protection for personal information while it is stored in the cloud and when it is in transit to and from the cloud.

The cloud data storage proposal outlines compliance with the *Privacy Act 1988 (Commonwealth)*. QUT's preference is for the Department's cloud infrastructure to be located within Australian data centers and comply with Australian Commonwealth security and privacy principles. If that is not the case, any decision to transfer personal information outside Australia should be consistent with the requirements of *Privacy (Australian Government Agencies – Governance) APP Code 2017* Chapter 8 or the equivalent *Information Privacy Act 2009 (Qld)* (IP Act) s33.

The use of personal information stored in a "data lake" presents privacy risks. QUT considers that compliance with the APP Code represents acceptable privacy management. Data analytics projects should be managed in a way that is consistent with the Code, and privacy impact assessment should be undertaken and documented for any analysis of identifiable personal information.

Any access granted to agencies other than TEQSA or the Department should only be permitted where authorised by law or where adequate consultation and notification has been provided to the Commonwealth Privacy Commissioner, the HEP and the individual/s concerned.

#### **Supplementary comment regarding terminology.**

On a non-technical note, it would be remiss were we to avoid reference to the name of the reporting system to be phased out. QUT laments the retirement of the acronym HEPCAT, surely the most felicitous term in the Australian higher education glossary. Both government and the higher education sector are endowed with numerous acronyms – it has even been suggested we carry this tendency a bit far – but none is so reliably capable of providing small moments of joy as the sonorous, witty and inherently delightful HEPCAT. We hope to see it in circulation again one day in a new context. May its fallow season be short and its next incarnation long-lived.