

Our Ref: 146667

17 April 2014

Mr Paul Romanis
ABS Project Leader: Essential Statistical Assets
via email: paul.romanis@abs.gov.au

Dear Mr Romanis

Re: Essential Statistical Assets for Australia Initiative

Thank you for the opportunity to comment on the discussion paper *Identifying the Essential Statistical Infrastructure for Australia*.

Identifying the infrastructure developed and used by governments to collect, produce, disseminate and access statistical assets is an important initiative of the ABS.

The approach taken by the ABS in developing the framework is to be commended as a mechanism for enhancing the quality and value of Australia's statistical systems.

Overall the five categories and four criteria for selection of a statistical infrastructure asset work well. The two-tiered approach to identifying the asset (dimension of asset and asset) would benefit from further consideration and testing. The two-tiered approach cannot be applied uniformly across all categories, particularly to the methods and processes category.

Please find attached further detailed comments in relation to the four questions raised in the discussion paper.

I look forward to the next iteration of the framework and our continued involvement in this project.

Yours sincerely

A handwritten signature in black ink, appearing to read 'Rod Camm', is written over a light blue horizontal line.

Rod Camm
Managing Director

cc Marie Apostolou

enc NCVER response to the discussion paper.

NCVER response to the discussion paper: Identifying the Essential Statistical Infrastrucutre (ESI) for Australia.

April 2014

1. Draft ESI framework, scope and structure

In relation to the scope of the framework we acknowledge that 'traditional' infrastructure assets such as hardware and common software applications are out of scope.

It is unclear from the scope statement whether individual student management systems used to collect vocational education and training data as the primary source of the administrative data collection would be in or out of scope.

The framework presented in figure 1 is logical and covers standards and classifications, legislation, policies and governance, systems, people and methods and processes.

From figure 1 it is unclear where institutional type assets are to be covered - people or governance, or at all. Should collection agencies such as ABS, NCVER, ACARA and AIHW be considered essential statistical infrastructure assets?

The framework at this conceptual level would also benefit from examples under each category.

Of interest is the use of sub categories and how these will be defined. These are supplied by way of example in Appendix 1 but do not form part of the discussion paper other than by way of mention in paragraph 14.

2. Content and proposed application of the criteria in determining the list of ESI

The four proposed criteria are:

1. Infrastructure that are critical foundational elements for a well-functioning statistical system.
2. Infrastructure that is critical to the production of essential statistical assets within the system.
3. Infrastructure that have broad/multi-purpose applicability.
4. Infrastructure that are expected to provide enduring benefits to the statistical system.

While the paper explicitly discusses the first two criteria, the same level of detail is not provided for criteria three and four. In particular criteria three would benefit from additional explanation, as this is to be used in the threshold for inclusion on the list.

3. Proposed structure of the ESI, including the use of the two-tiered approach

The relationship between the proposed two tiers is not always evident or the same for all categories. Specifically the two tiers are:

- i) **Infrastructure Asset Dimensions** represent the first tier, and generically identify the essential assets based on their ability to deliver defined outcomes

and benefits. These dimensions would not be expected to significantly alter over time.

ii) **Infrastructure Assets** represent the second tier, which are the specific assets that are attributable to an identifiable owner/custodian. As technology and coordination across government

While this relationship is relatively straight forward under four of the categories it does not work well for the methods and processes category. This is demonstrated by way of two examples provided in the appendix. Under the people category one of the examples has curriculum as the dimension, and Australian Curriculum (ACARA) as the asset. However under the methods and processes category one of the examples has weighting methods as the dimension and benchmarking methods as the asset.

We suggest this is the one area of the framework that requires further consideration and development.

4. Content of the list of ESI in Appendix 1

In relation to the list in Appendix 1 we have limited our response to infrastructure assets related to vocational education training (with the VET provider collection on the essential statistical assets list).

The following is not necessarily exhaustive. We would welcome the opportunity to develop this list further with the ABS once the infrastructure framework is finalised.

Category	Sub category	Infrastructure Asset Dimension	Infrastructure Asset	Criteria
People	Education framework and curriculum	Industry level training resources	Only one training package is listed here. There are numerous packages across industries – all owned by different Industry Skills Councils and all listed on training.gov.au	These are essential also for criteria 2 as they form the basis of student enrolments captured in the VET provider collection.
Standards, Classifications and Registrars	Standards	Data Collection Standard	Australian Vocational Education Training Management Information Standard (AVETMISS)	2 and 4
Systems	Collect	Administrative data collection systems	AVS (AVETMISS validation software)	2 and 4

Category	Sub category	Infrastructure Asset Dimension	Infrastructure Asset	Criteria
Systems	Disseminate	Output Systems	NCVER website (NCVER)	2 and 3
			Myskills.gov.au (Department of Industry)	2 and 3
Principles, Legislation and Governance	Legislation	Data Collection Regulation	National VET Regulation (NSSC)	2 and 4