



# Police Federation of Australia

The National Voice of Policing

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The Secretary  
Senate Education, Employment and Workplace Relations Committee  
Parliament House  
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## **Student Identifiers Bill 2013**

The Police Federation of Australia (PFA) is the national employee body that represents the industrial and professional interests of its 57,000 members across all of all State, Territory and Federal police associations and unions in Australia. The following submission outlines the overall privacy concerns from a policing perspective regarding the proposed Student Identifiers Bill 2013. This submission is made in light of similar privacy concerns raised by Australia policing in a submission on the *Australian Privacy Amendment Legislation Exposure Drafts* in March 2011 to the Senate Finance and Public Administration Committees.

The *Student Identifiers Bill 2013* (the Bill) may have a significant impact on police jurisdictions who host Registered Training Organisations (RTOs). The primary concern of policing relates to the implications of the Unique Student Identifier (USI) for the privacy and security of police officers.

In particular, the USI will involve the collection and storage of the personal information of police officers by an external body. Currently, such data is collected and managed internally by police to protect the privacy of police officers and to prevent breaches of jurisdictional security. While the Bill indicates measures will be taken to prevent unauthorised access to personal information, the potential for external access to such information is perceived by policing as high risk.

In addition, the Bill indicates that personal information may be disclosed for the purposes of research related to education and training. The potential distribution of USI data to additional external agencies presents a further risk to the privacy of police officers.

This risk is further compounded for police officers who engage in undercover, intelligence, witness protection, and court hearing activities. The security of the personal information of such individuals

is critical to both their own safety and that of the public. Access to such information through the USI database or for research purposes has the potential to compromise public safety and place police officers at risk.

For these reasons, the proposed Unique Student Identifier represents a risk to privacy and, therefore, the security of police officers. It is respectfully requested that these concerns are taken into account when defining the nature of the Unique Student Identifier with regards to policing.

We would be pleased to appear before the Committee to expand on our submission if required. If an invitation to give evidence was forthcoming we would also seek to invite an employer representative/s to appear with us.

Sincerely yours

Mark Burgess  
Chief Executive Officer