



Australian Government



Dear Dr Thomson

Thank you for the invitation to make a submission to the inquiry by the Senate Education and Employment Legislation Committee into the provisions of the Student Identifiers Amendment (Enhanced Student Permissions) Bill 2019.

I understand that the Senate Standing Committee for the Scrutiny of Bills has referred the Student Identifiers Amendment Bill to the Committee for two reasons. Firstly, in response to a perceived risk that the proposed amendments will remove people's ability to make a "fresh start" and secondly, to ensure that adequate privacy protections are in place.

There are important questions and I welcome the opportunity to address them in this submission.

In relation to the risk that the proposed amendments will remove people's ability to make a fresh start, it is relevant to note that the proposed amendments give a student full control over who to give permission to view their transcript and what information is presented on that transcript. In generating a transcript for an entity to view, it is completely up to the student to decide what parts of their training history to include and what parts to omit. This freedom to choose what parts of their training history to generate into a transcript is clearly communicated to the student when they log in to their account and select the transcript generator function. An entity who receives permission is only able to view a static copy of the transcript generated by the student. The giving of a permission to view does not give the entity access to the student's USI account and entire training records. The student will also be able to set the length of time during which an entity can view the transcript online, and is able to remove this permission to view at any time.

In relation to the adequacy of privacy protections, the Office of the Unique Student Identifier has a very good record of protecting our students' personal information. A recent review of our privacy management by the Office of the Australian Information Commissioner found that the USI initiative is well designed to protect privacy and that we demonstrate a privacy-aware culture, supported by ongoing training and comprehensive policies to comply with the Australian Privacy Principles in the *Privacy Act 1988 (Cth)*. With over 10 million USIs in the USI Registry we have demonstrated that students can access the benefits of a single, national online record of their training, without jeopardising their right to privacy. In 2020 we will communicate directly with students on what they can do to keep their personal information and USI account secure.

I do not believe that the proposed amendments will make it more difficult to protect the privacy of students' personal information. The abovementioned aspects of student control regarding who is given permission to view a transcript and for what period are important privacy controls. Some of the entities to which a student grants permission to view a transcript will be subject to the Privacy Act and Australian Privacy Principles. Of particular relevance here is APP 6 which requires an entity to only use or disclose information for the purposes for which it was collected. Regardless of whether an entity is

subject to the Privacy Act, when an entity uses the view transcript code provided by a student, the entity will be asked to agree to conditions of use, specifically to only use the transcript information for the purpose for which it was provided, keep it safe and not share it with anyone else without obtaining the student's permission.

I reiterate my thanks for the invitation to make a submission. I hope that my submission assists the Committee in completing its inquiry.

Yours sincerely

Janette Dines