

30 April 2013



Committee Secretary
Senate Education, Employment and Workplace Relations Committees
PO Box 6100
Parliament House
Canberra ACT 2600
Australia

By email: eewr.sen@aph.gov.au

Dear Secretary,

The Australian Manufacturing Workers' Union (AMWU) welcomes the opportunity to contribute to the Senate Education, Employment and Workplace Relations Legislation Committee's Inquiry into the Student Identifiers Bill 2013.

The AMWU supports the passage of the Bill, which provides an opportunity for vastly improved data collection and transparency, which we hope will contribute to improving our understanding of how effectively the vocational education and training sector is meeting Australia's need for vocational skills.

We support and adopt the submissions of the Australian Council of Trade Unions.

The AMWU believes that the proper implementation of an effective student identifier system is a necessary reform that has the potential to provide accurate data on the performance of the VET system to policy makers and regulators, as well as to consumers.

The absence of reliable commencement, completion and destination data has hampered efforts to accurately identify trends and weaknesses in the system and in some cases resulted in students being unable to make informed decisions about their participation in VET programs.

The AMWU has made numerous submissions in recent years to a variety of consultations and inquiries in which it has been critical of what we perceive as serious weaknesses in the system that are damaging the VET brand:

- Declining quality of training delivery and outcomes compounded by the absence of effective compliance monitoring to ensure industry standards are being met;
- Pressure to leave training to the 'market' which is resulting in a race to the bottom on quality and incentives to rot the system.

ANDREW DETTMER
President
Australian Manufacturing
Workers' Union
Registered as AFMEPKIU
Victoria National Office
2nd floor,
251 Queensberry Street,
Carlton South. Vic 3053

Telephone: 03 9230 5888
Facsimile: 03 9230 5887

amwuvic@amwu.asn.au

- Declining apprenticeship completions due to poor pay and conditions and low quality training and employment experiences for apprentices;
- Pressure for fully institutional delivery of key trade, technical and production qualifications;
- A disconnect between training delivery and the requirements of the workplace as specified in competency based qualification specifications developed by Industry Skills Councils, ie the training is not really vocational.

We welcome moves to establish a Student Identifier System that we hope will contribute to alleviating some of these weaknesses.

We believe that the information that should result from improved data collection should assist the consumers of VET, both individuals and industry, to become better informed and more demanding consumers. It should also assist policy makers and funding bodies to target scarce funding more effectively in the public interest.

We strongly support the principle outlined in the Parliamentary Secretary's Second Reading Speech:

"... that individuals will have control over their student identifier and can determine who can have access to their personal and educational records associated with it. The protection of an individual's student identifier—and the personal and educational data that it links to—is paramount, and the bill provides important safeguards to protect the privacy of individuals."

We welcome the provisions contained in the Bill that attempt to protect the privacy and confidentiality of student identifiers and submit that confidence in the integrity of these provisions will be central to the success of the scheme.

We express some concern however that the provisions contained at Sections 18 and 19 are somewhat ambiguous and open to interpretation.

In particular, Section 18 authorises an entity "*collect, use or disclose a student identifier of an individual if the individual consents (expressly or **impliedly**) to the collection, use of disclosure.*" emphasis added.

We submit that the provision should require express consent.

In relation to Section 19, we submit that a provision reliant on the entity having "**reason to suspect**" is open to abuse.

We understand and support the intention of the Agency not to charge fees in respect of applications for Student Identifiers and submit that this intention should be explicitly included in the legislation itself.

In relation to Sections 9(2), 9(4), 11(2), 14(2), 25(3), and 26(4) we submit that the Bill should require the written notice to be provided within a specified period of time.

We support the provisions relating to "Authenticated VET Transcripts" in Part 3 of the Bill and note that these provisions may assist students and graduates to access recognition of prior learning more readily than is currently the case.

We question whether the Bill would benefit from having a requirement for Registered Training Organisations to accept, for the purposes of recognition of prior learning, or meeting entry and/or pre-requisites, an Authenticated VET Transcript.

In summary, the AMWU supports passage of the Bill through the Parliament.

Yours sincerely,

On behalf of
Andrew Dettmer
National President
Australian Manufacturing Workers' Union