



Australian Government
Department of Employment,
Skills, Small and Family Business

Senate Education and Employment Legislation Committee inquiry into the Student Identifiers Amendment (Enhanced Student Permissions) Bill 2019

Submission by the Department of
Employment, Skills, Small and
Family Business

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Introduction

The Department of Employment, Skills, Small and Family Business (the department) welcomes the opportunity to make a submission to the Senate Education and Employment Legislation Committee (the Committee) inquiry into the Student Identifiers Amendment (Enhanced Student Permissions) Bill 2019 (the Bill).

The department's role is to support economic growth, by delivering policies and programs that assist job seekers to find work, encourage small and family businesses to grow, and maximise opportunity through access to quality skills and training. This includes matters that deal with skills and vocational education and training (VET) policy, regulation and programs, including student identifiers policy.

Student identifiers were introduced through the enactment of the *Student Identifiers Act 2014* (the Act). They commenced from 1 January 2015 and enable:

- individuals to obtain an authenticated VET transcript (VET transcript) of their training history (since 2015)
- longitudinal data in national VET data collections, which:
 - supports recognition of prior learning
 - streamlines the administration of entitlement programs
 - improves quality indicators
 - underpins the measurement of trends such as changes in commencement and completion rates.

VET students are required to have a student identifier to be awarded VET qualifications or VET statements of attainment, unless an exemption exists. To date, more than 10 million student identifiers have been created. The student identifier is free, easy to create and stays with an individual for life.

The Act establishes the Student Identifiers Registrar, a statutory officer holder responsible for administering the student identifier scheme nationally. The Registrar is appointed by the Commonwealth Minister responsible for administering the Act, in consultation with state and territory skills ministers. The Registrar is supported in the performance of their functions by the Office of the Student Identifiers Registrar (OSIR), which is located in Adelaide.

What is a VET transcript?

A VET transcript collates into one record all nationally recognised training an individual has undertaken from 1 January 2015, at different registered training organisations (RTOs) across Australia.

An individual who has been assigned a student identifier is the only person who can login and request their VET transcript from within the secure USI registry system.

To obtain a transcript the individual needs to log into their USI account, select “view transcript” and determine access permissions. Individuals can request a full VET transcript showing all their

training history or an extract with only the training achievements that are relevant to the specific purpose for which they are requesting the VET transcript. To request an extract, the individual unchecks the boxes beside any qualifications or units/modules that they do not want to include. An individual then has the option to download the VET transcript in a portable document format (PDF).

Individuals can use their VET transcript as evidence when applying for a job or licence, or seeking credit towards further education and training. Over 1.3 million individuals have accessed their VET transcripts since the system became available in May 2017.

A VET transcript does not replace a VET qualification or VET statement of attainment document issued by an RTO. In particular, it does not include training completed before 1 January 2015. However, it does provide consolidated evidence of an individual's nationally recognised VET across RTOs and locations, and is especially valuable where the original RTO documentation has been lost or the RTO has ceased operating.

Under section 28 of the Act, individuals currently can only set access controls to enable RTOs or and VET-related bodies such as governments that deal with VET-related matters to view the individual's VET transcript.

Since the activation of VET transcripts in May 2017, employers, employment agencies, and state, territory and Commonwealth licensing bodies have expressed interest in being able to verify an individual's VET transcript. Downloaded PDF VET transcripts provided by individuals can currently only be verified by contacting each RTO to confirm an individual's qualifications, which is time consuming.

Access to a VET transcript is controlled by the individual

The Bill simply expands the range of entities that can request access to a VET transcript, or an extract of a VET transcript. The Bill does not change the individual's control of who accesses their VET transcript. Only the holder of a student identifier can decide, as they currently do, who can view and verify their VET transcript. This will mean that potential employers, employment agencies, licensing bodies or governments will be able to verify the transcripts that individuals provide to them.

Individuals will have a quick and easy mechanism to provide assurance that their VET qualifications and other training history are genuine. The ability for businesses and other entities, at the individual's choosing, to verify an individual has pre-requisite credentials will reduce the time taken and potential costs for businesses to verify VET credentials. This may in turn mean an individual with relevant credentials can be employed sooner.

Expanding access to VET transcripts will reduce the risk of individuals tampering with their VET transcript before providing it to an employer. Giving businesses this assurance should provide confidence to industry in the authenticity of VET qualifications, while personal information remains under the control of individuals.

Only individuals choose what is displayed in a VET transcript

As well as continuing to control who can view their VET transcript, individuals also control how much of their training information is displayed in the VET transcript made available to additional entities. The Bill does not change individuals' ability to provide an extract of their VET transcript.

The Act enables individuals to request a full VET transcript of all their nationally recognised training activity (since 2015) or an extract of their VET transcript. Extracts comprise specific training achievements selected by the individual for the purpose they are creating their transcript. In expanding access to transcripts to other entities, the Bill ensures that individuals continue to be able to choose how much of their VET qualifications or training history is included in the VET transcript provided to these entities for verification. This keeps the control of VET transcripts in the hands of the individual, and in doing so, maintains their privacy. The following scenarios outline some circumstances where an individual may want to generate an extract or a full VET transcript:

- Scenario 1: Sam was unable to complete the VET course he was studying at high school due to difficulties he experienced during this time. Some years later Sam applied for a counselling job after gaining a Diploma of Counselling. He sailed through the diploma, achieving competency in each unit on his first attempt. Sam does not want to show the outcomes of the VET course he was studying at school, feeling the results may disadvantage him, so he requests an extract of his VET transcript that only displays the Diploma of Counselling to the prospective employer.
- Scenario 2: Alex gained an Advanced Diploma of Information Technology and a Certificate III in Hairdressing. Alex is applying for an Information Technology position with a firm and only wants to make her Advanced Diploma of Information Technology visible to the potential employer. Alex does this by requesting an extract of her VET transcript that only displays the Advanced Diploma of Information Technology and the units within it.
- Scenario 3: Rani is applying for a personal watercraft licence to operate a jet ski and needs to demonstrate competence in safely operating a jet ski. Rani has completed many other VET courses since 2015 and these will all display in a full VET transcript. The licensing authority has limited time to process licences and does not want to sift through all of Rani's training to find the relevant record. Rani requests a VET transcript that only shows her personal watercraft competencies, allowing the licensing authority to quickly verify her competencies.
- Scenario 4: Mila feels her varied skills and numerous VET qualifications gained over the last five years will support any job she applies for and requests a full VET transcript to include with her applications.

Privacy considerations

An individual's privacy was considered as a priority throughout the legislative and IT design processes.

A Privacy Impact Assessment (PIA) was commissioned early during the legislative and IT system enhancements stages to ensure compliance with the Australian Privacy Principles and the *Privacy Act 1988* (Cth). All recommendations were agreed and built into the implementation model, pending the passage of the Bill in the Parliament.

The department and OSIR consulted with the Office of the Australian Information Commissioner and the Attorney-General's Department in relation to the PIA and the proposed legislative amendments.

Listed are some other privacy considerations that were built into the implementation model for this proposed initiative:

- before a third party can view an individual's VET transcript (full or an extract), the entity must agree to the terms and conditions of being granted that access
- the individual must set the period that the VET transcript is stored in the USI registry system and once this period expires, no-one will be able to view the VET transcript
- the individual can cancel access to their VET transcript at any time, taking effect immediately
- an audit log will be kept of access to VET transcripts so that any attempted unauthorised access can be identified.

A communication strategy will be rolled out to businesses and other entities to support the implementation of extending access to view VET transcripts to other entities selected by the USI holder.

The department and OSIR will review this initiative and communication material after its implementation on an ongoing basis to ensure compliance and that it continues to meet the needs of the individual.

Conclusion

The ability for employers, employment agencies and licensing bodies to verify an individual's academic record will increase transparency of the VET sector and reduce regulatory burden during employment recruitment exercises. This is intended to simplify the process to verify VET qualifications and support individuals to gain employment.

Control remains in the hands of the individual as they decide whether they request a full VET transcript or an extract of their VET transcript, and they decide which entities can request to view their VET transcript for verification.

This measure will provide confidence to industry on the authenticity of VET qualifications while keeping information under the control of the individual.