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14 February 2013

Ms Alison Cleary
USI Submissions
Unique Student Identifier Taskforce
VET Reform Division
Department of Industry, Innovation, Science, Research and Tertiary Education
PO Box 9839
Canberra ACT 2601

Dear Ms Cleary

Unique Student Identifier (USI) Legislative package

I am writing in response to the public consultation on the Unique Student Identifier (USI) legislative package.

The National Centre for Vocational Education Research (NCVER) supports the introduction of a national USI as a mechanism to record all accredited VET undertaken, and qualifications achieved for each individual over his or her lifetime. I must emphasise that these benefits can only be achieved by the mandatory provision of data by all training providers to the National VET Provider Collection.

The USI is included in the Australian Vocational Education and Training Management Information System Standard (AVETMISS) for 2014 training activity (version 7.0). Any name change will need to be communicated to NCVER so that any necessary minor changes to the standard can be made. I am also seeking your advice on the wording of the privacy notice that needs to be included as part of the standard enrolment questions in AVETMISS (Recommendation 3 of the USI Privacy Impact Assessment (PIA)). With the final publication of AVETMISS due in April 2013, your prompt attention to these matters would be appreciated.

With regards to the legislative package, I note that the current legislation focuses on the collection, use and disclosure of the student identifier, but not the demographic information also collected and retained by the USI agency. For example, date of birth, address and gender information. The legislation should also explicitly cover the collection, use and disclosure of this demographic information.

NCVER continues to support the USI through to implementation through our contribution on a number of working groups, ongoing dialogue on communication strategies for RTOs, and the development of the technical requirements for a USI transcript service. As part of our support to ensure all stakeholders have the confidence to use the USI system, we are also reviewing our privacy policies and procedures, and data security arrangements.

Yours sincerely



Tom Karmel
Managing Director