



**The Hon Andrew Giles MP**  
**Minister For Skills and Training**

**The Hon Jason Clare MP**  
**Minister for Education**

MS25-000932

Ms Vivianne Johnson  
Acting Student Identifiers Registrar  
100 Waymouth Street  
ADELAIDE SA 5000

[Vivianne.Johnson@usi.gov.au](mailto:Vivianne.Johnson@usi.gov.au)

Dear Ms Johnson

As the Ministers responsible for the administration of the *Student Identifiers Act 2014*, we are writing to provide you, as Acting Student Identifiers Registrar, with strategic direction in the form of the attached Ministerial Statement of Expectations.

As outlined in the Department of Finance's *Regulator Performance (RMG128)* guidance, Ministerial Statements of Expectations should be issued or refreshed every 2 years for all Commonwealth entities with regulatory functions, or earlier if there is a change in minister, change in regulator leadership, or significant change in Commonwealth policy. Clear expectations from the Australian Government helps drive better performance, providing an enabling environment that supports the implementation of best practice.

We would appreciate your response in the form of Statement of Intent, outlining how you intend to meet the expectations. To ensure transparency and accountability, the Statements of Expectations and Intent should be published and made available on your website.

Thank you for your timely assistance with this matter. We look forward to your response.

Yours sincerely

ANDREW GILES 1/4/2026

JASON CLARE 1/4/2026

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## STATEMENT OF EXPECTATIONS

### Acting Student Identifiers Registrar

This Statement sets out the Australian Government's expectations for the Acting Student Identifiers Registrar (the Registrar) in undertaking functions consistent with the *Student Identifiers Act 2014* (SI Act) regulatory functions.

The government is committed to supporting a high-quality, responsive and accessible education and training system that allows Australians to gain well-paid, secure jobs in areas of national priority and to contribute to a strong economy.

Since being established via the SI Act, more than 17 million Unique Student Identifiers (USIs) have been created, allowing learners to access nationally recognised Vocational Education Training (VET) and higher education opportunities, supporting robust processes for students and providers and informing evidence-based policy at the Commonwealth and state and territory level.

#### Registrar's role

The functions of the Registrar under the SI Act are summarised below<sup>1</sup>:

- report to the Minister for Skills and Training and the Minister for Education regarding the delivery of the USI initiative
- assign student identifiers and schools identifiers to individuals
- verify or give a student identifier or schools identifier of an individual
- verify or give an individual's school identity management information
- prepare and provide access to authenticated VET transcripts
- ensure that a record of all student identifiers, schools' identifiers and school identity management information is kept in such form as the Registrar considers appropriate
- resolve problems related to student identifiers and schools' identifiers
- appropriately manage the Student Identifiers Special Account.

#### The government's policy priorities

The government remains focused on improving productivity and achieving its regulatory objectives at the lowest cost to citizens and businesses. The government is focussed on supporting learners, creating a skilled workforce and streamlining processes to deliver outcomes for Australians and the economy. To that end, the government is committed to maintaining the privacy and security of the USI Registry, tracking student performance to encourage life-long learning and skill acquisition and encouraging regulatory best practice, while better balancing risk mitigation with efficiency, growth and dynamism. The government expects the Registrar to identify and pursue opportunities to contribute to these objectives while reducing unnecessary regulatory burden. In doing so, the government expects the Registrar to:

- tailor their approach to administering the USI in a way that considers the diverse needs of school, VET and higher education students, schools and school systems, Registered Training Organisations (RTOs), higher education providers and VET admission bodies as appropriate
- tailor their approach to administering the USI initiative in a way that supports school, VET and higher education students, schools and school systems, RTOs, higher education providers and VET admission bodies to comply with the SI Act and regulations
- utilise the civil penalties provisions of the SI Act as appropriate

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<sup>1</sup> Note in relation to the Act's schools identifier provisions, the Schools USI Project delivery is in progress.

- balance risk mitigation with efficiency, growth and dynamism when implementing appropriate controls to manage the risk of unauthorised disclosure of protected or sensitive information
- use intelligence and data to inform a risk-based approach to regulatory engagement, including proportional targeting of activities of concern
- draw on evidence and stakeholder experience to identify and address systemic non-compliance
- work cooperatively with stakeholders including school students and parents, VET students, higher education students, RTOs, schools and school systems, higher education providers and VET admission bodies to encourage voluntary compliance
- monitor their operating environment so that delivery of their functions has regard to changes in technology, industry practices and community expectations
- respond appropriately to the changing context and operating environment of school students, VET students, higher education students, RTOs, schools and school systems higher education providers and VET admission bodies
- set key performance indicators and service standards for their regulatory activities, including in relation to any reform proposals
- operate in a way that demonstrates the principles of regulator best practice as set out in Resource Management Guide 128 *Regulator Performance*
- be transparent in their operations, policies and decision-making processes including through appropriate reporting of regulatory decisions, performance or emerging issues.

### **Relationship with stakeholders**

Regarding relationships with stakeholders, the government expects the Registrar to:

- ensure that actions are not inconsistent with the policies of the government, in support of compliance with section 21 of the *Public Governance, Performance and Accountability Act 2013* (PGPA Act)
- consult with stakeholders and provide appropriate guidance so that school students, VET students, higher education students, schools and school systems, RTOs, higher education providers and VET admission bodies have clarity about how the Registrar will exercise their powers
- coordinate regulatory activities with other regulatory agencies to avoid duplication, including through sharing information and undertaking joint education activities where appropriate and possible
- work collaboratively with relevant agencies across government including states and territories to support school students, VET students, higher education students, schools and school systems, RTOs, higher education providers and VET admission bodies, for example by informing interdepartmental and interjurisdictional consultative forums
- work in close collaboration with our departments to administer the USI pursuant to the SI Act, including implementation of the schools USI national enabling initiative.

### **Ministerial and portfolio responsibilities**

The Minister for Skills and Training is responsible for the SI Act, except for functions related to the use of school identifiers in schools and student identifiers in higher education, which is overseen by the Minister for Education.

The government will provide an enabling environment for the Registrar to consistently implement best practice by ensuring they are well informed of the government's policy direction, as specific initiatives and strategies are being considered.

The Department of Employment and Workplace Relations (DEWR) Secretary and Department of Education Secretary will provide the staff necessary to assist the Registrar in the delivery of their functions.

DEWR and the Department of Education will take into account the views of the Registrar when considering and advising on VET, higher education and schools reforms related to the USI. Given the many operational interactions between OSIR and several areas within DEWR and Education, including in relation to the Student Identifiers Special Account, ICT systems and staffing, it is vital that our operating and governance forums remain robust and effective. This extends to the interactions and responsibilities between OSIR and Education. The Registrar will work collaboratively with the Department of Education to design and establish appropriate administrative arrangements to support the introduction and management of school identifiers.

### **Organisational Matters**

Regarding organisational matters, the government expects the Registrar to:

- support the DEWR Secretary in his capacity as Accountable Authority for the Registrar
- manage and maintain delegation of the Registrar's powers under the SI Act
- administer the USI initiative so that it is relevant to the environment, business stakeholders and outcomes it is supporting
- administer the USI initiative so that it is compliant with applicable legislative and policy requirements
- manage and govern USI data in line with data policy protocols as agreed by Ministers
- prepare and give the Ministers an annual report to be presented to Parliament on operations of the Registrar as soon as practicable after the end of the financial year
- in partnership with DEWR and Education, direct their Australian Public Service (APS) staff who assist the Registrar to deliver functions in a way where they are abiding by their respective departmental policies, procedures and obligations under the *Enterprise Agreement 2024-27* and other relevant APS legislation and frameworks (e.g. APS Code of Conduct, *Public Service Act 1999*, *Public Service Regulations 2023* etc.)
- align their approach and implementation with the 6 principles of the Regulatory Policy, Practice and Performance Framework for the regulator's role, regulatory posture, specific legislative objectives, functions, and environment<sup>2</sup>
- uphold and promote the APS Values and Code of Conduct
- comply with the requirements under the PGPA Act and associated instruments and policies
- hold themselves to account through internal accountability processes that foster a culture of continuous improvement and reflection.

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<sup>2</sup> Note the Registrar is expected to align their approach with these principles to the extent the Registrar has regulatory functions under the SI Act.