Program Protocol

Tertiary Collection of Student Information

Data-matching between Services Australia and the Department of Education

January 2024

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Program Protocol

# Description of the Program

This Data Matching Protocol is an amendment to the previous Data Matching Protocol between Services Australia and the former Department of Education, Skills and Employment (DESE) dated December 2020.

## Overview of the Program

### Services Australia and the Department of Education (**DE**) previously separately collected a range of information about students from higher education and vocational education and training providers (**Providers**) under particular legislation, as follows:

#### Services Australia collected information under the *Social Security (Administration) Act 1999* (Cth) (**SSA Act**) through the Centrelink Academic Reassessment Transformation (**CART**) process and manual compliance processes[[1]](#footnote-2); and

#### DE collected information under the *Higher Education Support Act 2003* (Cth) (**HESA**) and the *VET Student Loans Act 2016* (Cth) (**VSLA**) through its Higher Education Provider Client Assurance Tool (**HEPCAT**).

### Services Australia and DE were tasked by the Australian Government to work together to develop a joint solution that would bring together the separate processes for the collection of student information from Providers (i.e. to replace CART, HEPCAT and manual compliance processes). This solution is known as Tertiary Collection of Student Information (**TCSI**). The TCSI solution has rationalised reporting requirements so that Providers report student information once, through a single mechanism. Both DE and Services Australia can then use this information to enable them to administer their relevant laws.

### The TCSI solution has been implemented in DE’s tenancy in Services Australia’s Data Exchange Hub (a large repository of information, comprised of a number of tenancies that are either “owned” by Services Australia (i.e. they contain Services Australia data and are controlled by Services Australia), or provided by Services Australia to other agencies as a service). Services Australia, as a service provider of the tenancy, does not have control over DE’s tenancy. However, Services Australia may access DE’s tenancy, as set out in the Service Level Agreement (**SLA**) between Services Australia and DE, as discussed below.

### As part of the TCSI solution, Services Australia has entered into an SLA with DE. The SLA provides that DE may share a subset of the data it has collected from Providers under the HESA and the VSLA with Services Australia as is permitted by relevant legislation. The sharing of this data enables Services Australia to administer its student payments and services in a more streamlined manner (noting that DE also uses the personal information in the DEtenancy to administer the HESA and the VSLA).

### The TCSI solution involves a data-matching program (**Program**), comprised of two data-matching processes:

#### DE uses the information disclosed by Services Australia to DE (held in the DE tenancy) to match it (through an automated process) with other information held in the DE tenancy, to identify students who are mutual customers of both Services Australia and DE. DE uses this information to create enriched match files about students who are mutual customers. The enriched match files are subsequently disclosed to Services Australia.

#### The second data matching process occurs when DE receives new information from Providers or from Services Australia about a student. DE automatically checks whether that student is a matched student in the Mutual Customer Register (**MCR**). If the student is within the MCR, the DE tenancy creates or updates the enriched match file, which is subsequently released to Services Australia.

## Objectives of the Program

### The objectives of the Program are to:

#### provide near-real time data to DE and Services Australia;

#### reduce duplication of information and effort for students, Providers and the Government;

#### improve data quality and availability;

#### help pre-populate new claims for student payments and identify changes in a student’s study circumstances earlier;

#### improve the accuracy of Services Australia’s payment outlays and reduce the risk of students being overpaid; and

#### contribute to the reduction of manual processing associated with student claims, reviews and debt recovery actions, resulting in reduced administrative costs.

# Relevant Agencies

## Matching Agency

### As DE’s tenancy is used to conduct the Program, DE is the Matching Agency for the purposes of this Protocol.

## Source Entities

### The following entities have been identified as Source Entities for the purposes of this Protocol:

#### Providers, who report information to DE using the TCSI solution. A subset of this information is provided to Services Australia, once a match has been established; and

#### Services Australia, who provide source data via the TCSI solution to initiate a matching request with DE.

## Primary User Agency

### Services Australia is the primary user of the data that will be shared as a result of the Program and is therefore deemed to be the Primary User Agency.

## User Agency

### DE will also be considered a User Agency, on the basis that the Program ensures DE is fulfilling its privacy and legislative obligations prior to disclosing the information to Services Australia.

# Description of the Program Protocol

## Purpose

### The purpose of this Protocol is to:

#### inform the public about the existence and nature of the Program;

#### identify the relevant agencies and entities involved in the Program;

#### detail the direct relationship of the Program to the performance of the lawful functions and activities of Services Australia and DE;

#### set out the legal basis for the collection, use or disclosure of personal information involved in the Program;

#### outline the objectives of the Program, the procedures that are employed, the nature and frequency of the matching covered by the Program and the justifications for the matching;

#### explain what methods other than data-matching were available and why they were rejected;

#### detail any cost/benefit analysis or other measures of effectiveness, which were taken into account in deciding to implement the Program;

#### outline the technical controls used to ensure data quality, integrity and security in the conduct of the Program;

#### outline the nature of the action proposed to be taken in relation to the results of the Program by Services Australia;

#### indicate what form of notice is to be given to individuals whose privacy is affected by the Program; and

#### specify any time limits on the conduct of the Program.

## Requirement for a Program Protocol

### The Office of the Australian Information Commissioner’s (**OAIC’s**) *Guidelines on* *Data Matching in Australian Government Administration* (**Guidelines**) specify that a program protocol be prepared by agencies conducting certain data-matching programs. The Guidelines are voluntary, but represent the OAIC’s view of best practice. Services Australia and DE comply with these Guidelines, and have jointly prepared this Protocol.

### Services Australia and DE comply with the Australian Privacy Principles (**APPs**) as provided in Schedule 1 of the *Privacy Act 1988* (Cth) (**Privacy Act**). Services Australia and DE’s Privacy Policies[[2]](#footnote-3) outline how to complain about a breach of the APPs, and how Services Australia or DE will deal with such a complaint. Individuals who consider that Services Australia or DE have interfered with their privacy may also complain to OAIC.

# Data collected through the TCSI Solution

## Type of data to be provided

### Services Australia and DE collect a range of data (including personal information) under the Program that is matched by DE as the Matching Agency. Refer to Technical Standards Report Appendix A.

## Ensuring the quality of the data

### To ensure that the data is of sufficient quality to be used in the Program, in relation to information received from and disclosed to, Services Australia, the data undergoes the following validation processes:

#### data standardisation is applied, to ensure that there are high quality data matches;

#### DE only returns matched results to Services Australia if DE is satisfied that there is a high confidence match;

#### Services Australia verifies data with the individual to whom it relates, prior to making a decision that could have an impact on an individual’s payment (such as a reduction in benefit); and

#### Services Australia and DE offer all individuals the opportunity to correct or update their personal information.

### Additionally, to ensure the highest level of data integrity possible:

#### the Program does not accept incorrect or incomplete data packets;

#### the Program ensures that validation and verification of data occurs at the time that the data is received (and before any data is disclosed);

#### data that comprises of inadequate or corrupt data items is identified and corrected; and

#### the data elements used in the matching process have been standardised (at the point of matching, the data standards are converted to ensure that they are consistent between Services Australia and DE).

## Data Security

### Services Australia and DE exchange data using the dedicated ICON Network. This mechanism provides secure and trusted communications between Government entities.

### The data provided to DE for the purposes of matching is extracted by Services Australia from the secure SAP environment. This core system employs strict security controls and measures, including the following:

#### system access controls and security groupings;

#### login identification codes and password protection;

#### encryption of data at rest and in-flight; and

#### full audit trails of data files and system accesses.

## Data Retention and Destruction

### Data collected by DE is managed in adherence with the *Archives Act 1983* (Cth) (**Archives Act**) and the National Archives of Australia’s *Record Authority 2009/00593947.*

### Data collected by Services Australia is managed in adherence with the *Archives Act* *1983 (Cth) (Archives Act)* and the National Archives of Australia’s Record Authority *2011/00714998.*

### Data shared between DE and Services Australia for the purposes of matching is not stored if a match is unable to be established. If the information cannot be matched, it is deleted seven days after the attempted matching.

### Data not required to be retained by national archives, will be destroyed within 90 days.

# The Matching Process

## The Program identifies mutual customers of DE and Services Australia. For a match to be established a person must be:

### a customer claiming, or in receipt of, a student payment administered by Services Australia; and

### a student whose study details are required to be reported by a Provider to DE in accordance with the HESA or the VSLA.

## Services Australia identifies records of customers claiming, or in receipt of a student payment, and sends identity details (specifically, surname, first name, second name, date of birth, address, gender, student identification number and institution identification number) to DE, who attempts to match those details against student records they hold.

## If a match is located, DE discloses to Services Australia information about the matched individual (refer to Appendix A for a list of data elements that are disclosed by DE to Services Australia).

# Action Resulting from the Program

## If new or updated information is received by DE from a Provider, DE will check if the student is identified as a mutual customer. Once a customer match has been established, and for the period they continue to be a mutual customer, DE discloses a range of information about students to Services Australia, for use as set out below.

## Student Online Claim Pre-population

### To assist the customer in streamlining the online student claim process, Services Australia can use the information received from DE to pre-populate the claim form with the customer’s available study details.

## Changes in study circumstances

### To ensure payment accuracy and to reduce the risk that a customer will incur an overpayment, Services Australia uses the information received from DE to identify where a change in study circumstances may affect payment eligibility or entitlement. Services Australia then applies that data to the student record and generates one of the following processes:

#### **Cessation Review** –this identifies where information has been received that indicates that a customer may have ceased their studies.

#### **Course Completion Review** – this identifies where information has been received that identifies that a student has completed a course that affects their student payment.

#### **Enrolment Details Review** –this identifies where information has been received that indicates that a customer has changed Provider/(s), course/(s) or changed their study load, such that it will impact on their student payment.

#### **No Match Review** –this identifies where there is insufficient information to establish a high confidence match between a student record and a Services Australia customer record.

#### **Scholarship Review** – this identifies where information has been received that indicates that a customer may have received an Indigenous Commonwealth scholarship that may affect their eligibility for subsequent scholarships payable through Services Australia.

### Where a review is generated, the customer will receive a notification requesting that they review and respond to Services Australia. For the cessation, course completion and enrolment details reviews, the customer can respond in one of the following ways:

#### Agree with the data – at this point the data is automatically applied to the record, payment eligibility and entitlement is recalculated and a payment outcome is determined. ABSTUDY, ABSTUDY PES and Vulnerable customers, will not have data automatically applied when they agree with the data.

#### Agree with the data but request an exemption – at this point the customer is asked to provide evidence to support their exemption. The customer is given a further 14 days to supply supporting evidence, upon provision of which the matter is referred to Services Australia staff for assessment.

#### Disagree with the data – at this point the customer is asked to provide additional information to verify their claim before any changes are made to the customer record.

### Where a Scholarship review is generated, the customer can respond in one of the following ways:

#### Agree with the data – at this point the data is automatically applied to the record, payment eligibility and entitlement is recalculated and a payment outcome is determined

#### Disagree with the data – at this point the customer is asked to provide additional information to verify their claim before any changes are made to the customer record.

### Where a ‘no match’ review has been created, the customer is asked to take further action to assist in accurately matching their student and Services Australia customer record. This may include verifying additional personal information, supplying the correct information or correcting the current information held by their Provider.

### The following payment outcomes may result from the above reviews:

#### change in rate of student payment;

#### continuation of current rate of payment;

#### assessment of overpayment;

#### suspension of student payment; or

#### cancellation of student payment.

### These outcomes will be the result of the customer’s response to the notification they receive once a review is generated. Where a customer fails to respond to the review, Services Australia makes a determination of the appropriate administrative actions based on the information provided by DE.

### The generation of reviews as outlined in 6.3, will require a determination to be made under section 6A of the Social Security (Administration) Act 1999 to automate decisions. Any future expansion of the TCSI system beyond this pilot will require a new determination to be made under section 6A of the Social Security (Administration) Act 1999.

## Customer Notifications

### Customers will receive a notification when one of the aforementioned reviews generates. The notification will outline the reason for the notification, the source from which Services Australia received information (DE), the action the customer is required to undertake, the timeframe in which they have to undertake the action and the appropriate Social Security or ABSTUDY Policy Manual reference for the issued notice. Customers will also be notified of any administrative actions taken and the outcome, following any of the processes outlined above. See Appendix B for examples of customer notifications.

# Time Limits Applying to the Program

## This Program is intended to continue indefinitely to facilitate the effective operation of the TCSI system and to provide confidence that DE is only disclosing information about mutual customers. The Protocol will be reviewed every three years.

## Students are deemed mutual customers for the period in which they are a Services Australia claimant. The record of the student being deemed a mutual customer, is end-dated from the day they cease to be a student payment recipient (generally this is 13 weeks after cancelation of payment).

## Services Australia may act upon information received from DE, when there is a change in study circumstances which may affect the payment eligibility or entitlement for a mutual customer. The general timing of the action being undertaken will be within 14 days of the information being received.

# Public Notice of the Program

## Services Australia has notified the public of our intention to undertake this program by publishing a notice in the Federal Register of Legislation - Gazettes as per Gazette C2021G00041, published on the 14 January 2021.

## This Protocol has been made publicly available via the DE and Services Australia websites.

## OAIC has been consulted in developing this Protocol.

# Reasons for Conducting the Program

## Relationship with the Agencies’ Lawful Functions

### Services Australia and DE have worked together to develop the TCSI solution, which aims to:

#### reduce duplication of information and effort for students, Providers and the Government;

#### improve availability of data and data quality;

#### improve student claim processing timeframes and payment accuracy; and

#### reduce student debt and increase data integrity with near real-time updates on change of circumstances.

### The Program is related to Service Australia’s lawful function of delivering welfare payments and services to students and trainees by ensuring that only those claimants who meet the payment eligibility and entitlement requirements under the relevant laws receive those payments and services, and that those students and trainees receive the correct amount of payment and/or service. In administering social security law, section 8 of the SSA Act requires that the Secretary have regard to a number of principles of administration including:

#### the delivery of services under the law in a fair, courteous, prompt and cost‑efficient manner;

#### the development of a process of monitoring and evaluating delivery of programs with an emphasis on the impact of programs on social security recipients; and

#### the establishment of procedures to ensure that abuses of the social security system are minimised.

### This Program addresses these principles of administration by ensuring that student claimants receiving a payment are and continue to be eligible to receive the payment and are entitled to receive the amount of payment they are receiving, in a way that reduces the reporting burden on Providers and students.

### The Program is related to DE’s lawful functions of administering the HESA and the VSLA. This is because the Program furthers the efficient and proper administration of the higher education and vocational education sectors as a whole, including ensuring that students are correctly identified where there are transactions involving multiple Commonwealth agencies.

## Legal Authority

### Providers are required to report specific information to DE in accordance with the HESA and the VSLA.

### Services Australia is governed by the following acts (collectively referred to as social security law hereafter) for the administration of student related payments and services:

#### *Social Security Act 1991* (Cth);

#### SSA Act; and

#### *Student Assistance Act 1973* (Cth)

### Under social security law, a claim for a social security payment may only be granted if the delegate is satisfied that the claimant is eligible (or qualified) for the social security payment and entitled (or payable) to receive it in accordance with social security law.

### To be eligible for a social security payment, a student generally needs to be studying full time and meet other requirements including Australian residence rules, income and assets tests and be doing an approved course or full time Australian Apprenticeship.

### The disclosure by DE of students’ personal information to Services Australia falls within two of the exceptions listed in APP 6.

#### APP 6.2(b) provides that use or disclosure for a secondary purpose is permitted if the use or disclosure of the information is required or authorised by or under an Australian law or a court/tribunal order.

##### Disclosure of information collected under HESA or VSLA to a person employed or engaged by Services Australia (an agency that administers the *Human Services (Centrelink) Act 1997;* the *Social Security Act 1991* and the *Student Assistance Act* 1973), for the purposes of performing functions or duties of Services Australia, is authorised by law under the section 180-23 of the HESA and 93(1) of the VSLA.

#### APP 6.2(a) permits a secondary use if the individual about whom the information relates would reasonably expect an entity to use or disclose the information for a secondary purpose which is related (or ‘directly related’ in the case of sensitive information) to the primary purpose.

##### Students who receive Commonwealth assistance by accepting a Commonwealth supported place or deferring their tuition fees through the Higher Education Loan Program are required to complete a Commonwealth Assistance Form (CAF). The CAF specifies how the student’s personal information is used and disclosed. If a provider develops their own CAF it must, at a minimum, contain the information specified on the Commonwealth CAF.

##### In addition, Services Australia presents upfront notification to applicants for a student claim to advise that Services Australia may collect information from third parties, including other government agencies. This initial notice then links to Services Australia’s privacy page, which contains Services Australia’s privacy policy and a range of discrete privacy notices for the public to read.

##### Services Australia will continue to update and amend all relevant communications to ensure they correctly reflect where Services Australia collects personal information from.

## Disclosure of Information Provisions

### Section 202(2)(b) of the SSA Act authorises disclosure of protected information[[3]](#footnote-4) for a range of purposes including where the disclosure is for the purposes of the social security law and/or for the purposes of the *Student Assistance Act 1973* (Cth).

### Section 180-23 of the Higher Education Support Act give effect to the TCSI data sharing arrangement, authorising the disclosure of protected information to Services Australia.

## Alternative Methods

### Following a number of assessments, including Privacy Impact Assessments, the TCSI solution was deemed to be an appropriate approach from a privacy perspective to sharing student data to enable Services Australia to fulfil its lawful functions. In undertaking these assessments, the following alternative measures were considered:

#### Use of Services Australia’s coercive information gathering powers under section 195 of the SSA Act. This measure would have allowed for the collection of data for a class of people (students). It was determined that while lawful, this approach was not preferable from a privacy perspective.

#### Continuation of the CART process, in which Services Australia requests data directly from Providers to determine payment entitlement and eligibility. This process was determined to be burdensome for Providers and Services Australia and had limited success in correctly matching student and customer records.

### The TCSI solution intends to improve the rigour and effectiveness of data matching and sharing arrangements for education data and create opportunities for automation. In addition to creating administrative efficiencies for Providers and Government, it protects the privacy of students and increases payment accuracy for customers in receipt of a student payment from Services Australia.

### In addition to the measures set out in this Protocol, Services Australia will continue to develop and implement other targeted compliance measures, which may not rely on data matching, to ensure the integrity of student payments.

## Social Considerations

### There are three key social issues associated with the Program:

#### only persons entitled to receive payments from Services Australia do so and they receive payments at the correct rates;

#### the integrity of the income support system; and

#### the protection of an individual’s right to privacy.

### Allied to these issues is a concern for social justice. In particular, there is strong support in the community for an income support system that directs available funds to those most in need of assistance. The program helps to achieve this in two ways:

#### strengthening controls in Services Australia’s payment systems reduces the cost of programs, allowing Government funds to be redirected to other priorities; and

#### effective controls in payment systems encourage community involvement in voluntary compliance and helps to increase public confidence in the system.

### Suitable safeguards against unreasonable intrusion into the privacy of individuals are built into the data-matching arrangements. Matching is conducted in accordance with the Information Commissioner’s Guidelines on data matching in Australian Government Administration.

## Prior Data Match Programs

### The current Data Matching Protocol is for the continuation of the program under the previous Data Matching Protocol published on the 14 January 2021.

### Prior to the Data Matching Protocol, student data was collected by Services Australia directly from Providers through the CART process and manual compliance processes.

### The CART process, while partially automated, often resulted in significant manual processing for Services Australia staff, Providers and students. Due to the dependency on students to notify the correct Provider and enrolment details, the CART process resulted in 49% of customers not being matched with a Provider. The CART process was decommissioned in September 2019.

### DE has no prior data matching programs with Services Australia for tertiary education data.

### The first data-matching exercise under the TCSI solution occurred in 2020 when Services Australia disclosed information about all current students receiving payments administered by Services Australia to DE. This exercise occurred over a two week period for the purposes of validating the matching process and MCR. Provider on-boarding to the TCSI solution was completed in November 2020, allowing the MCR and matching process to be validated in real-time.

# Costs and Benefits

## The Program will have both direct and indirect financial benefits, in the form of preventing incorrect payments, administrative savings and voluntary compliance, as outlined in more detail below:

### improved data matching and increased process automation will facilitate payment accuracy and reduce the risk of overpayments;

### a streamlined reporting solution will reduce administrative overheads for Providers and Government; and

### the availability of near real-time data to assist customers in managing their reporting obligations in respect to changing study circumstances will improve voluntary compliance.

## In addition to the financial benefits outlined above, there are a number of non-financial benefits associated with the Program, including:

### improved data quality, ensuring consistency in data elements that are reported across the tertiary education sector and applied by Government; and

### enhanced customer experience, simplifying the claim process through the pre-population of available study data and providing opportunities for customers to self-service through earlier notification of changes that may affect their payment and easily accessible online reviews.

# Changes to this Protocol

## Services Australia and DE may agree to amend this Protocol, from time to time.

## If this Protocol is amended:

### the OAIC will be notified of the amendments and the OAIC will be provided with a revised copy of this Protocol; and

### a revised copy of this Protocol will be made publicly available.

## This Protocol is a revision of the previous published Protocol version 1.0 as outlined in Document Details.

# Appendix A – Technical Standards Report

# Data from Services Australia to DE

Services Australia provides the following data to DE:

| **Field Name** | **Description** |
| --- | --- |
| Student ID | The identifier used by Providers to identify students (customers) |
| Surname | The customers’ surname |
| First Name | The customers’ first given name |
| Middle Name | The customers’ other given names |
| Date of Birth | The customers’ date of birth |
| Gender | The customers’ gender |
| Address | The customers’ current and recent addresses |

# Data from DE to Services Australia

DE provides the following data to Services Australia:

| **Field Name** | **Description** | **Services Australia Use** |
| --- | --- | --- |
| E306 Provider Code | A code assigned by DE which uniquely identifies the Provider | Maps to Services Australia’s Education Institution Tables. |
| E780 Provider Name | The Provider name as recorded by DE  | Maps to Services Australia’s Education Institution Tables. |
| E781 Provider Type | A code assigned by DE to determine whether a Provider is a Higher Education, VET or dual provider | Maps to Services Australia’s Education Institution Tables. |
| E525 Campus Suburb | Name of the suburb/town/region where the campus is located  | Maps to Services Australia’s Education Institution Tables. |
| E559 Campus Postcode | The Australian postcode of the campus where the course is being offered/provided | Maps to Services Australia’s Education Institution Tables. |
| E477 Delivery Location Postcode | The Australian postcode of the delivery location where the student is studying the unit | Maps to Services Australia’s Education Institution Tables. |
| E307 Course Code | A code which uniquely identifies each course within a Provider  | Maps to Services Australia’s course tables, assisting in the assessment of course approval status for student payments. |
| E308 Course Name | The full name of the course | Maps to Services Australia’s course tables, assisting in the assessment of course approval status for student payments. |
| E596 Standard Course Duration | The standard duration of the course of study for a full-time student | Maps to Services Australia’s course tables, assisting in the assessment of course approval status for student payments. |
| E310 Course of Study Type Code | A code that identifies the type of course by award (i.e. Diploma, Masters, etc.) | Maps to Services Australia’s course tables, assisting in the assessment of course approval status for student payments. |
| E350 Course of Study Load | The aggregated EFTSL value for a course of study, summed across all units required to meet a course of study  | Maps to Services Australia’s course tables, assisting in the assessment of course approval status for student payments. |
| E534 Course of Study Commencement Date | The date on which the student commenced the current course of study  | Maps to Services Australia’s course tables, assisting in the assessment of course approval status for student payments. |
| E329 Mode of Attendance Code | A code which identifies the mode of attendance by which the student undertakes their study (i.e. internal, external, employer based) | Used by Services Australia to aid in the assessment of a customer’s qualification for student payment(s). |
| E599 Course Outcome Code | A code, which categorises the outcome of a student’s course (i.e. completed, withdrawn, etc.) | Used by Services Australia to aid in the assessment of a customer’s qualification for student payment(s). |
| E592 Course Outcome Date | The date of the student course outcome | Used by Services Australia to aid in the assessment of a customer’s qualification for student payment(s). |
| E354 Unit of Study code | A code which uniquely identifies a unit of study | Used by Services Australia to aid in the assessment of a customer’s qualification for student payment(s). |
| E622 Unit of Study Year Long Indicator | An indicator of units of study that are full-year units  | Used by Services Australia to aid in the assessment of a customer’s qualification for student payment(s). |
| E339 Equivalent Full-Time Study Load | The EFSTL value representing the student load for a unit of study | Used by Services Australia to aid in the assessment of a customer’s qualification for student payment(s). |
| E600 Unit of Study Commencement Date | The date on which the student commences the unit of study | Used by Services Australia to aid in the assessment of a customer’s qualification for student payment(s). |
| E355 Unit of Study Status Code | A code, which categorises the status of a student’s unit of study (i.e. Failed, Completed, Withdrew, etc.) | Used by Services Australia to aid in the assessment of a customer’s qualification for student payment(s). |
| E601 Unit of Study Outcome Date | The expected or actual date of the outcome for a student’s unit of study | Used by Services Australia to aid in the assessment of a customer’s qualification for student payment(s). |
| E489 Unit of Study Census Date | The census date for the unit of study | Used by Services Australia to aid in the assessment of a customer’s qualification for student payment(s). |
| E313 Student Identification Code | A code which uniquely identifies the student within the Provider and remains constant from year to year | Used in the data matching process. |
| E402 Student Family Name | The family name of the student | Used in the data matching process. |
| E403 Student Given Name – First | The first given name of the student  | Used in the data matching process. |
| E404 Student Given Name – Others | The other given name of the student  | Used in the data matching process. |
| E314 Date of Birth | The day, month and year of birth of the person | Used in the data matching process. |
| E315 Gender Code | A code which identifies the gender of a person  | Used in the data matching process. |
| E410 Residential Address Street | The street address of the student’s residence | Used in the data matching process. |
| E469 Residential address Suburb | The suburb of the student’s residence | Used in the data matching process. |
| E470 Residential address State | The Australian state or territory of the student’s residence | Used in the data matching process. |
| E658 Residential address Country code | The country code of a student’s residence | Used in the data matching process. |
| E320 Residential address Postcode | The Australian postcode of a student’s residence | Used in the data matching process. |
| E415 Reporting Year | The reporting year to which the individual record relates  | Used to determine the year for which a Commonwealth Scholarship applies. |
| E666 Reporting Period | The reporting period to which the individual record relates (i.e. first or second half of the year)  | Used to determine the period for which a Commonwealth Scholarship applies. |
| E526 C’th Scholarship Status Code | A code which identifies the status of a Commonwealth Scholarship | Used to identify where a student has received/been offered a Commonwealth Scholarship that would affect their entitlement. |
| E545 C’th Scholarship Type Code | A code which identifies Commonwealth Scholarship type  | Used to identify where a student has received/been offered a Commonwealth Scholarship that would affect their entitlement. |
| E598 C’th Scholarship Amount | Total scholarship amount paid to the student in the reporting period  | Used to identify where a student has received/been offered a Commonwealth Scholarship that would affect their entitlement. |
| E490 Student Status Code | A code which indicates the student status for a unit of study, OS-HELP or SA-HELP Loan  | Used to identify student status information which could affect their entitlement when studying a Start up Year Course,  |

#  Matching Techniques

## Identity Matching

### The Program comprises of two data-matching processes:

#### DE uses the information disclosed by Services Australia to match against other information held in the DE tenancy. This automated process identifies students who are mutual customers of both Services Australia and DE.

##### Where a Services Australia customer is making an online claim for a student payment, their available personal information (as outlined in clause 1 above) is sent from Service Australia’s systems to DE’s tenancy in an attempt to match the record. Where a match is established and enriched, match information is provided by DE to Services Australia and the information is used to pre-populate available study details in the customer’s online claim. Once the claim is submitted, the matched record is added to the MCR to ensure any relevant study changes (for the period a customer is in receipt of a payment and ending 13 weeks after their student payment ceases) are provided to Services Australia to assess ongoing entitlement and eligibility for a student payment.

##### Existing customers, who are undertaking applicable tertiary education and are in receipt of a student payment, have their personal information (as outlined in clause 1 above) sent to DE in an attempt to match the record. Where a match is established, the match is stored in the MCR and any relevant study changes (for the period a customer is in receipt of a payment and ending 13 weeks after their student payment ceases) are provided to Services Australia to assess ongoing entitlement and eligibility.

##### To establish the match, approximate string (fuzzy logic) matching and weighting criteria are applied to each data element to produce a match confidence score. Only the highest confidence score will qualify as a match, at which point the data (as outlined above) is provided to Services Australia.

##### Matched records are passed to Services Australia’s core systems for further validation prior to the information being committed to a customer record. Once applied to the customer record, the customer will be provided the opportunity to verify the data before any payment affecting change is made.

##### Information about records deemed to match will be registered in the MCR. Information about records deemed to not match will be deleted after seven days. All match results (both success and failure) will be written to an audit log within the MCR.

#### The second data matching process occurs when DE receives new information from Providers or from Services Australia about a student. DE automatically checks whether that student is a matched student in the MCR. If the student is within the MCR, the DE tenancy creates or updates the enriched match file, which is subsequently released to Services Australia. If the student is not within the MCR, the first data matching process will apply if triggered.

### Services Australia will send match requests in the following two ways:

#### Event-driven matching – when a customer makes a claim for a student payment.

#### Fortnightly batch matching –staggering the customer cohort across the 10 business days in a fortnight cycle

#  Risks

## Incorrect Identity Matches

### As with any data matching exercise, there is a risk of incorrect identity matches occurring. If an incorrect identity match occurs, there is a risk that personal information about a student who is not a mutual customer will be disclosed by DE to Services Australia. This carries potential reputational risks for the Commonwealth if the Commonwealth is perceived to be using personal information inappropriately. The following measures have been established to help mitigate this risk:

#### DE uses sophisticated identity matching techniques to ensure that the correct student record is identified and matched with the Services Australia customer record from the initial match request. This technique relies on business rules set by DE in its SLA with Services Australia, and uses approximate string matching and weighting criteria across available data elements to achieve an identity match.

#### DE has adopted a cautious approach to matching. Only matches that result in a high confidence score are provided to Services Australia as an ‘enriched match file’. High confidence matches occur where approximate string capability identifies all possible matches and the weighting criteria is applied to provide a match confidence score.

#### Services Australia undertakes further validations to ensure the certainty of this match.

## Data quality controls and audit

### A number of data quality controls and audit mechanisms have been implemented as part of the Program, including:

#### The application of a strict data schema to ensure that reported data is consistent across all Providers. A data specification has been made publicly available to ensure that Providers and their software developers are aware of the standards by which their data should be collected and reported to DE.

#### Inbuilt system validations to ensure that the data reported by Providers meets the minimum standards, prior to being stored in DE systems.

#### Additional system validations and verifications of data by DE prior to the data being disclosed to Services Australia and then further matching validations by Services Australia before the data is assigned to a customer record.

#### Use and maintenance of audit logs for all transactions between DE and Services Australia. The audit logs specific to the Program contain the following information:

##### Customer Reference Number (CRN) relating to the customer match request;

##### transaction ID;

##### time & date of requests/responses;

##### matching outcome (including match score);

##### List of elements transmitted to DE, as part of the matching request

##### list of elements transmitted to Services Australia, as part of the matching response; and

##### destination of transmitted elements;

#### Opportunities for customers to verify the data prior to administrative action being applied, where the data may have an impact on payment eligibility or entitlement, this includes:

##### pre-population of the online student claim for the customers to review and edit, prior to the claim being submitted;

##### payment reviews that can be accessed by the customer through their electronic notification or online account. These reviews provide the customer the opportunity to verify the data or provide evidence to the contrary, before the data is applied as referenced in 6.3.7.

## Security and confidentiality

### Services Australia’s and DE’s core ICT systems have extensive security features to ensure that any information stored within the systems is not:

#### subject to accidental or intentional modification;

#### accessed by DE or Services Australia staff unless such access is necessary for the conduct of the Program or any resulting actions; and/or

#### disclosed otherwise than as is contemplated by this protocol.

### The key security features of the ICT systems are as follows:

#### there are system access controls and security groupings;

#### there are login identification codes and password protection is enabled;

#### data is encrypted at rest and in-flight; and

#### there are full audit trails of data files and system accesses.

# Appendix B - Notifications

Example of letters

The following example notifications will be issued when a determination is made under section 6A of the Social Security (Administration) Act 1999.

If not delivered:{RETURNTOSENDERADDRESS}

{RETURNADDRESSBARCODE}

 {FORMID}

Customer Reference Number: **{REFERENCE.NUMBER}**

 <NOMCLI:

{RECIP.BARCODE}

{NOMINEE.NAME}

{NOMINEE.ADDRESS}

!

{RECIP.BARCODE}

{CLIENT.TITLE.FULLNAME}

{CLIENT.POST.ADD}

>

{PRINT.DATE}

|  |
| --- |
| <NOMINEE> = NOC with no customer suppression, display: |
| This is a copy of the letter we have sent to {CLIENT.FULLNAME} for whom you are the nominee. |
| <NOMINEE> = NOC with customer suppression, display: |
| This letter provides information about {CLIENT.FULLNAME} for whom you are the nominee. |
| Else, display null |

Dear {Salutation}

##### Standard Footer



##### Body Text

|  |
| --- |
| if {REVIEWTYPE} = PUE or WUE or CUE display  **Confirm your study details**  |
| if {REVIEWTYPE} = SUE display  **Confirm your scholarship details**  |
| if {REVIEWTYPE} = NUE display  **Confirm your details**  |
| End if |

|  |
| --- |
| if {REVIEWTYPE} = PUE display /\*'Enrolment Details Review\*/Your study details may change during the year. To make sure you are getting the correct payment you need to complete a review of your study details. |
| Else if {REVIEWTYPE} = NUE display /\*'No Match Review \*/We have not been able to confirm your enrolment details. |
| Else if {REVIEWTYPE} = SUE display /\*'Scholarship Review' \*/Your details may change during the year. You need to complete a review of your Commonwealth scholarship details.  |
| Else if {REVIEWTYPE} = CUE display /\*Course Completion Review\*/Your study details may change during the year. To make sure you are getting the correct payment you need to complete a review of your study details.  |
| Else if {REVIEWTYPE} = WUE display /\*'Course Cessation Review \*/Your study details may change during the year. To make sure you are getting the correct payment you need to complete a review of your study details.  |
| End if |

|  |  |  |  |  |  |  |  |  |
| --- | --- | --- | --- | --- | --- | --- | --- | --- |
| **What you need to do**You need to

|  |
| --- |
|  |
| if {REVIEWTYPE} = WUE or CUE or PUE display complete the review |
| else if {REVIEWTYPE} = SUE display confirm or update your study and scholarship details |
| else if {REVIEWTYPE} = NUE display confirm or update your details |
| End if |

 **by {Date}**

|  |
| --- |
| if {REVIEWTYPE} = PUE/CUE/WUE/NUE display or your payment may stop. If you have been paid too much you will have to pay us back. |
| else if {REVIEWTYPE} = SUE display or an overpayment may be raised which you will have to pay back. |
| End if |

You can check and update your study details by:* going to **my.gov.au** and signing in and selecting Centrelink to access your online account. Select the ‘**Academic Reassessment**’ task, then select the review.
* using the ****Express Plus Centrelink mobile app**.** Select the ‘**Academic Reassessment**’ task, then select the review. **You can download the free app to your mobile device. Make sure you have the latest version installed.** For information, go to **servicesaustralia.gov.au/expressplus**

When you’re completing the review, you may be invited to provide documents. You can do this by selecting the '**Upload Documents**'button in the ‘**Academic Reassessment**’ task. |

**More information**

If you have any questions about the letter, please call us on {PHONE.NUMBER} (call charges may apply).For more information about student payments, please go to **servicesaustralia.gov.au/students**

Yours sincerely

{OIC.NAME}

{OIC.TITLE}

[Letter Back]

**Your reference number is {CRN}**

**Our authority to request this information**

|  |
| --- |
| If {PAYMENT.TYPE} = AUS/EPF/PES/YAL |
| This is an information notice issued under social security law. You must comply with it by providing the information requested by the due date specified in the notice. It is an offence to refuse or fail to comply with an information notice.Giving false or misleading information is a serious offence.  |
| Else If {PAYMENT.TYPE} = ABY/EPA |
| This is a request made under chapter 1.5 of the *ABSTUDY Policy Manual*. |
| End IF |

**Privacy and your personal information**

The privacy and security of your personal information is important to us, and is protected by law. We need to collect this information so we can process and manage your applications and payments, and provide services to you. We only share your information with other parties where you have agreed, or where the law allows or requires it. For more information, go to **servicesaustralia.gov.au/privacy**

**If you would like to speak to us in your language**

If you would like to speak to us in your language, please call 131 202 (call charges may apply). You can also go to **servicesaustralia.gov.au/yourlanguage** where you can read, listen to or watch information in your language.​

**To make a complaint or give us feedback**

We aim to resolve your concerns as quickly as possible. If you want to make a complaint or give us feedback you can:

* call our feedback and complaints line on **1800 132 468**
* go to **servicesaustralia.gov.au/feedback** for other options.

If this does not resolve your concerns, you can make a complaint to the Commonwealth Ombudsman at **ombudsman.gov.au** using the online complaints form. If you are unable to complete the online form, you can call them on 1300 362 072**.**

Example of MyGov Messages

|  |
| --- |
| **Subject line: You have an online task to complete** |
| Hello <First/Preferred name>You need to complete a task in your online account.Please read the attached letter and complete the task by clicking the link below.  When you are in the task you need to select ‘submit’ to finalise it.Supporting information is available at the link below.Regards<Centrelink> |
|  Link to letter  |
| Complete your online taskSupporting Information |

Example of SMS

|  |
| --- |
| You have {NUMBER} days to do the online review of your study details. If you do not complete this by {DATE} your payments may stop. Do not reply by SMSSMS exampleYou have 3 days to do the online review of your study details. If you do not complete this by 02/10/18 your payments may stop. Do not reply by SMS Character Count (146) |

Example of Emails

|  |
| --- |
| *Subject Line:* Reminder: Online review of study details |
| This message is from Services Australia.Please DO NOT REPLY by email as this mailbox is not monitored.We recently asked you to check your study details. You have {NUMBER} days to do the online review of your study details. If you do not complete this by {DATE} your payments may stop.You can complete the review by going to the myGov websiteand signing in to access your Centrelink online account. Select the ‘Academic Reassessment’ task, then select the review.  |

Example Email Review Not Required Notification

Subject line: You do not need to complete your review

|  |  |  |  |  |  |  |  |  |
| --- | --- | --- | --- | --- | --- | --- | --- | --- |
| This message is from Services Australia. Please DO NOT REPLY by email as this mailbox is not monitored.

|  |  |  |  |  |  |  |
| --- | --- | --- | --- | --- | --- | --- |
| If {REVIEWTYPE} = PUE, NUE,WUR, SUE OR CUE display:

|  |
| --- |
| You no longer need to complete your If {REVIEWTYPE} = PUE displayEnrolment Details Review.  |
| If {REVIEWTYPE} = NUE displayNo Match Review. |
| If {REVIEWTYPE} = SUE displayScholarship Review.  |
| If {REVIEWTYPE} = WUE displayCessation Review. |
| If {REVIEWTYPE} = CUE displayCourse Completion Review. |
| End if |

 |
| End if |

For more information about student payments, please go to the Services Australia website and search 'student payment'. |

Example SMS Review Not Required Notification

|  |  |  |  |  |  |  |
| --- | --- | --- | --- | --- | --- | --- |
| You no longer need to complete your

|  |
| --- |
| If {REVIEWTYPE} = PUE displayEnrolment details review.  |
| If {REVIEWTYPE} = NUE displayNo Match review. |
| If {REVIEWTYPE} = SUE displayScholarship review.  |
| If {REVIEWTYPE} = WUE displayCessation review. |
| If {REVIEWTYPE} = CUE displayCourse completion review. |
| End if |

Do not reply by SMS  |

# Appendix C – Glossary

|  |  |
| --- | --- |
| **Term** | **Meaning** |
| ABY | means the ABSTUDY student payment for eligible Indigenous customers |
| Administrative action | means action taken in response to a match obtained through a data matching program that materially affects an individual, such as reducing a benefit or imposing a penalty. |
| APPs | mean the Australian Privacy Principles, set out in Schedule 1 of the Privacy Act. |
| AUS | means the Austudy payment for eligible students and apprentices over the age of 25 |
| CART | means the Centrelink Academic Reassessment Transformation process.  |
| Data Exchange Hub | means Services Australia’s repository of information, comprised of a number of tenancies that are either “owned” by Services Australia (i.e. they contain Services Australia data and are controlled by Services Australia), or provided by Services Australia to other agencies as a service.  |
| Data matching | means the bringing together of at least two data sets that contain personal information, and that come from different sources, and the comparison of those datasets with the intention of producing a match. |
| Data matching program | means the conduct of data matching to assist one or more agencies to achieve a specific objective.  |
| Database | means a structured collection of data or records, stored by means of a computer in a manner that facilitates retrieval. A dataset is a subset of a database.  |
| Dataset | means a discrete, ordered collection of data. A data set may be sourced from a database, and may be defined by specific criteria — for example, the receipt of a certain benefit within a given period. |
| DE | means the Department of Education |
| DESE | means the Department of Education, Skills and Employment. |
| Guidelines | means the *Guidelines on data matching in Australian Government administration*, published by the Office of the Australian Information Commissioner (**OAIC**), available at <https://www.oaic.gov.au/privacy/guidance-and-advice/guidelines-on-data-matching-in-australian-government-administration/>. |
| HEPCAT | means the Higher Education Provider Client Assurance Tool.  |
| HESA | means the *Higher Education Support Act 2003* (Cth).  |
| Icon Network | means the secure network used by Government entities to transfer confidential information. |
| Match | means a result produced by data matching, including a meaningful discrepancy, in relation to which administrative action may be taken by the Matching Entity or Source Entity. |
| Matching Agency | means, in relation to a data matching program, the agency whose information technology facilities or resources are used to conduct the data matching.  |
| MCR | means the Mutual Customer Register.  |
| OAIC | means the Office of the Australian Information Commissioner.  |
| Personal Information | means information or an opinion about an identified individual, or an individual who is reasonably identifiable:1. whether the information or opinion is true or not, and
2. whether the information or opinion is recorded in a material form or not.

(see section 6 of the Privacy Act) |
| PES | means Pensioner Education Supplement  |
| Primary User Agency | means, where a data matching program involves more than one agency, the agency that makes the most use of the results of a data matching program.  |
| Privacy Act | means the *Privacy Act 1988* (Cth). |
| Program | means the data-matching program that is part of the TCSI solution.  |
| Providers  | means providers of higher education and vocational education and training services.  |
| Services Australia | means the Services Australia agency within the Social Services Portfolio. |
| SLA | means the Service Level Agreement between Services Australia and DE, under which DE shares a subset of the data it has collected from Providers under the HESA and the VSLA with Services Australia to enable Services Australia to administer its student payments and services in a more streamlined manner. |
| Source Entity | means any entity that discloses a dataset or database containing personal information to a Matching Agency for use in a data matching program.  |
| SSA Act | means the *Social Security (Administration) Act 1999* (Cth).  |
| TCSI | means Tertiary Collection of Student Information.  |
| Technical Standards Report | means the report at Attachment 1 to this Protocol.  |
| User Agency | means an agency that uses the results of a data matching program.  |
| VSLA | means the *VET Student Loans Act 2016* (Cth).  |
| YAL | means Youth Allowance |

1. Manual compliance processes are only used in respect of information reported by the Providers of higher education services. [↑](#footnote-ref-2)
2. Services Australia’s Privacy Policy is available at <https://www.servicesaustralia.gov.au/organisations/about-us/publications-and-resources/privacy-policy>. DE’s Privacy Policy is available at<https://www.education.gov.au>/using-site/privacy. [↑](#footnote-ref-3)
3. As defined under section 23 of the *Social Security Act 1991* (Cth). [↑](#footnote-ref-4)