



**National Council of
Women of New Zealand**

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Wahine O Aotearoa

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**Submission to the Privacy Commissioner on the Proposed
Post-Compulsory Education Unique Identifier Code 2001(PCEUIC)**

Introduction

The National Council of Women of New Zealand (NCWNZ) is an umbrella organisation representing 43 nationally organised societies. It has 34 branches spread throughout the country to which women from some 150 societies are affiliated.

General Comment

The responses to this proposal to establish a Post-Compulsory Education Unique Identifier Code, have come from branches in Auckland and Nelson and from the Nucleus Committee and Corresponding Members of the NCWNZ Education Standing Committee. The respondents were completely polarised with almost an equal number of opposed to, as were in favour of the proposed code.

Responses in Favour of the PCEUIC

The respondents who were in favour of the introduction of the code agreed that it would

- provide an ongoing record of all qualifications gained by an individual since secondary school;
- be especially valuable to those students returning to study after a break;
- facilitate portability of qualifications;
- track those students who do not go on to tertiary study;
- enable easy access to obtain statistical data from the one central "warehouse".

They all agreed that Sections 4 which lists the agencies and classes of agencies to which the code would apply, Section 5 which identifies the information which may be recorded on an index, and Section 6 which describes the controls on access to a tertiary data warehouse, were acceptable, but required assurances that:

- it would be mandatory for all institutions listed in Section 4 to participate;
- all students, including those who are home-schooled, be included;
- only information relating to qualifications be stored;
- the service would be free.

There were also some concerns regarding where all this information would be stored, and the length of time that the data would be kept.

However, the major concern, expressed by both those for and against the proposal, was that despite the provisions for maintaining information privacy principle set out in Rule 12, the stored data would be available to other agencies. Students would need to have absolute confidence that all sections of Rule 12 and all the controls on access were strictly adhered to with regular monitoring by an outside independent agency.





Secondary and tertiary students who were asked their opinion of the proposed code, saw the logic of it provided that the privacy of the information was maintained. They do not regard the information required as particularly intrusive and believe that the only difference to the present numbering system which universities use, would be that it is collated on a national scale.

Responses Opposed to the PCEUIC

The setting up of the proposed code raised visions of totalitarian regulations.

Students are already equipped with a unique identifier with their name and birth date and the institutions listed in Section 4 already have systems in place which hold the records of PCE students, their courses of study and the qualifications gained. These records can be requested by the Ministry of Education for any necessary statistical and research purposes, and for the allocation of funding.

Government money spent on setting up and meeting the annual expenses of running a data "warehouse" could be better spent on other areas, i.e. Early Childhood Education, or Special Needs Services.

Conclusion

While members differed in their opinions, it would seem that the general feeling was that a PCEUIC used correctly, under the strictest conditions of the Privacy Act and regularly monitored by an independent organisation, would have many advantages. However with doubts about the cost of such a venture, and the possibility of abuse of the system, NCWNZ would need further detailed information and assurances before providing total support for the proposal.

NCWNZ members thank you for the opportunity to submit their views, and look forward to receiving further information.

Barbara Glenie
National President

Lois Lawn
Convener, Education Standing Committee