



Australian
National
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Privacy Impact Assessment

Rights, Relationships and Respect at ANU
Evaluation

7 Feb 2023: Updated version of approved PIA from 21 Dec 2022

Prepared by: Friederike Gadow, Senior Project Officer Policy & Research

Respectful Relationships Unit, Student and University Experience

Friederike.gadow@anu.edu.au

1. Executive summary/introduction

The Respectful Relationships Unit (RRU) and the Student Safety and Wellbeing Team (SSWT) have developed a comprehensive and bespoke sexual violence primary prevention program tailored to the ANU context. The program will comprise a blended learning program which includes (a) a bespoke e-module for all commencing students, (b) face-to-face multi session consent and sexuality education to three pilot residential halls, and (c) targeted pilot initiatives. The Centre for Social Research and Methods (CRSM) has been commissioned to conduct an independent evaluation of the program as a whole. This will primarily consider implementation, student motivations, knowledge and understanding, and attitudes towards sexual and gender-based violence.

This will help assess the feasibility, acceptance and impact of the education program, and adjust the pilot components for scaling up in 2024.

Update 7 February 2023

This document has been updated on 7 February 2023 to reflect approvals granted since the original version was approved, and to add detail in relation to the evaluation of the face to face education program. These have been added for completeness and clarification purposes; the approach to collection, storage, access and retention of personal data has not changed. Any edits to this document are highlighted in **bold**.

2. Project description

This PIA refers to the evaluation of the online module (**RRR Online**) and face to face workshops (**RRR f2f**), which will assess the implementation and efficacy of the education program. There are two key activities relevant to this:

1. Analysis of student responses and analytics: This element will assess the efficacy of the module against the learning outcomes. To achieve this, the CSRM research team will access and analyse deidentified Open Learning (OL) data including analytics and student engagement with the module. At the conclusion of the module, students will be asked to consent to the use of their data/responses for this evaluation, noting that their responses will not be attributable to them, and will remain confidential. Students will be required to check a box if they wish to 'opt out' of the evaluation and will be informed that their data will be included otherwise.
2. Surveys capturing implementation and impact data:
 - a. Online module: Students will also be asked to fill out a short Qualtrics survey about their experience completing the module.
 - b. Face to face sessions: Students will be surveyed asking implementation questions as well as knowledge/attitudinal questions.

The surveys will collect optional demographic data on the students to aid the evaluation: age, commencing/continuing student¹, gender, undergrad/postgrad/HDR, living on or off campus, international or domestic student. Students participating in the **surveys** will be asked to voluntarily provide their uID for the purpose of linking their survey responses to their analytic and response data on the Open Learning platform, and for linking their survey responses to **other surveys they may have participated in as part of the RRR evaluation**.

A Participant Information Statement will be provided **for each research activity**, after which consent to participate will be sought. Participation in either research activity will be voluntary and optional. Alternative options to the surveys will be offered to students who wish to participate but may have accessibility requirements.

¹ NB: It is anticipated that the majority of respondents will be commencing students, as this is the target audience for the module. Continuing students are however able to access the module if they so wish, and therefore participate in the research.

Update: This project has ANU HREC approval (protocol 2022/835 and 2022/850), unconditional Dir PSP approval for the RRR online evaluation and pending approval for the RRR f2f evaluation.

3. Threshold assessment

| Will the project involve: | Yes | No |
|---|-------------------------------------|-------------------------------------|
| Handling large amounts of personal information? | <input checked="" type="checkbox"/> | <input type="checkbox"/> |
| Handling sensitive information? <i>Sensitive information includes, but is not limited to, information about an individual's racial or ethnic origin, political opinions, religious beliefs or affiliations, criminal records, sexual orientation or practices, biometric information², health information and genetic information.</i> | <input type="checkbox"/> | <input checked="" type="checkbox"/> |
| Sensitivities based on the context in which the project will operate? | <input type="checkbox"/> | <input checked="" type="checkbox"/> |
| Handling personal information of individuals with particular needs? <i>Will it have greater sensitivities or disproportionate impacts on certain populations or groups of individuals.</i> | <input type="checkbox"/> | <input checked="" type="checkbox"/> |
| Handling personal information in a way that could have a significant impact on the individuals concerned? <i>Examples negative impacts on physical and mental wellbeing, reduced access to public services, discrimination, financial loss or identity theft.</i> | <input type="checkbox"/> | <input checked="" type="checkbox"/> |

4. Consultation with stakeholders

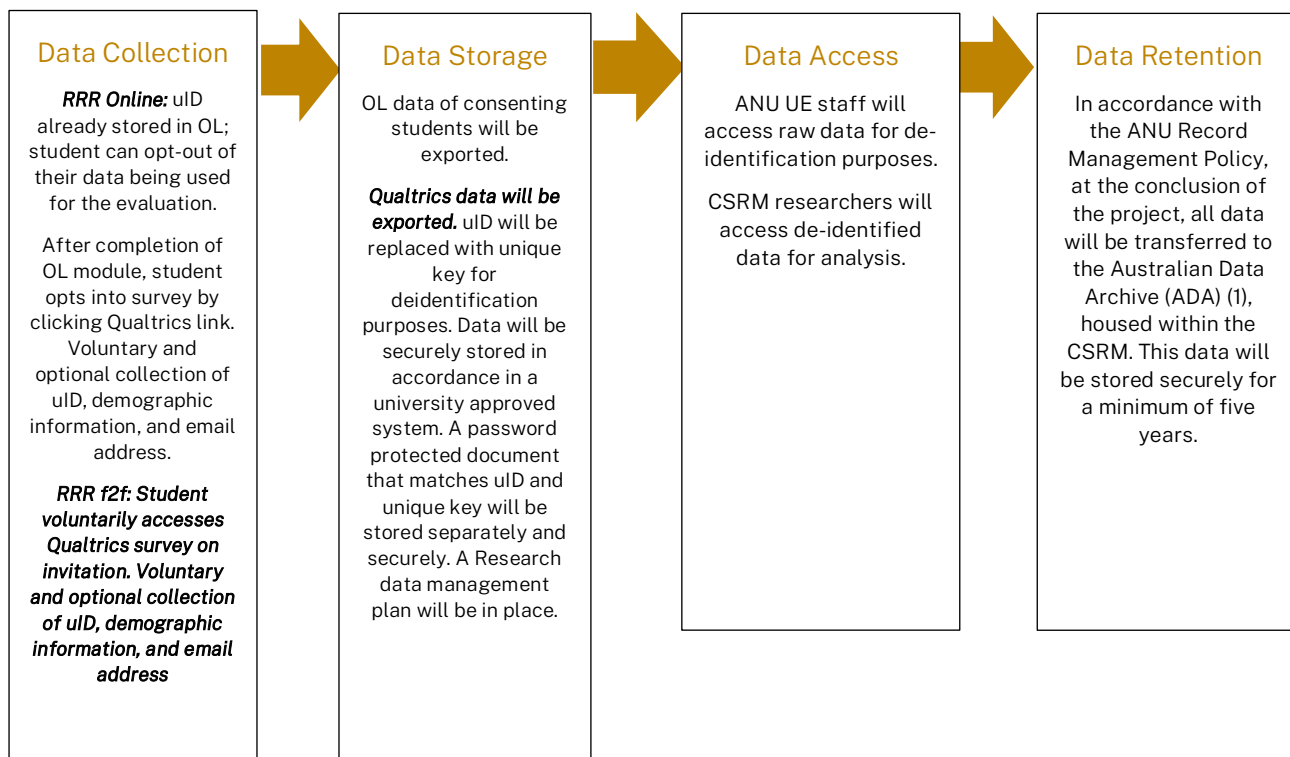
The following stakeholders have been consulted:

- Performance and Institutional Research, Planning and Service Performance
- Scholarly Information Services
- Student and University Experience including Director UE, Student Safety and Wellbeing
- Residential Services and Operations
- ANU HREC
- Centre for Social Research and Methods

² Biometric information is an electronic copy of an individual's face, fingerprints, iris, palm, signature or voice.

5. Information flows

Note the flow chart has been updated to include information flows for f2f surveys.



(1) The data will not include the key that is allocated for deidentification purposes

5.1 Data collection

What personal information is captured?

1. Demographic information:
 - Age
 - Gender
 - Commencing/continuing student
 - Undergrad/postgrad/HDR
 - Living on or off campus
 - International/domestic
2. Student uID
3. Email address

How will the personal information be collected?

This information will be collected as part of the surveys. Providing this information will be voluntary and optional, i.e. students can participate in the survey without providing any of this information.

Upon conclusion of the surveys, students can optionally provide an email address to go in the draw for a pre-paid voucher. The purpose of this lottery is to boost the response rate to the survey.

5.2 Data management

Who will have access to the personal information?

- ANU University Experience staff (see details below)
- Academic staff at CSRSM (de-identified)

A suitably qualified ANU staff member in the UE portfolio, who is not involved in the analysis of the data, will assign a unique key and delete uID information from the raw data before providing it to researchers for analysis. The same staff member will further manually match the unique key to survey raw data for the purpose of a linked analysis. The unique key matched to uID will be kept in a separate password protected document not accessible to the researchers. Student uIDs will not be used to link to ANU held administrative data.

All staff (CSRSM and ANU University Experience) with access to the data will have been approved by the appropriate delegate, provided with information on privacy in their training and have completed the ANU Privacy module on Pulse.

An administrator within the UE portfolio will separately draw and distribute the lottery prizes in accordance with the Lotteries Act 1964.

How can individuals request access to and/or correction of their personal information?

Students can request to withdraw from the research at any time, and/or request to have their personal information changed or deleted by contacting the appropriate ANU staff member (contact details will be provided).

When will the personal information be deleted/destroyed?

The conclusion of the project, all data will be transferred to the Australian Data Archive (ADA), housed within the CSRSM. This data will be stored securely for a minimum of five years.

6. Privacy management

| # | Privacy Impact | Necessity/Impact Rating/Impact Response | Impact treatment Plan |
|---|---|---|--|
| 1 | Personal information will be collected without a clear purpose, which could increase the risk of unauthorised uses and disclosures. | Low | Information (uID and demographic data) is being collected for the defined evaluation purpose on an optional and voluntary basis. Email addresses will only be collected from students wishing to enter the draw. The purpose will be clearly communicated to students on the surveys. |
| 2 | Consent for collection, use or disclosure of information may not be valid. | Low | Students will receive communication in the form of a Participant Information Statement about how their data will be used. They can opt-out of their OL data being used. The surveys will take an opt-in approach, and any personal information collected will be optional and voluntary. |
| 3 | Individuals may be surprised or upset by a secondary use or disclosure, resulting in privacy complaints and/or negative publicity. | Low | The data collected will only be used for the pursuit of the evaluation purposes indicated above. Data will not be used for purposes outside of the scope indicated to participants when they agree to provide information. Student uID will not be used to link to any other administrative data held by the University. |
| 4 | The organisation or agency does not have basic information security standards in place. | Low | A separate PIA has been conducted in relation to OL held data. Qualtrics software has existing CISO approval. Researchers will follow procedures as set out in the ANU Research Data Management Policy, and will gain ANU HREC approval prior to commencing the evaluation. |
| 5 | Individuals are not able to easily access and correct their personal information. | Low | Students will be able to contact a UE staff member to have their evaluation data corrected or deleted. |
| 6 | Poor quality information may lead to inappropriate decisions that have a negative impact on the individuals concerned. | Low | Students will receive clear communications including a Participant Information Statement checked and approved by ANU HREC and PSP. Administration of the survey will adhere to the ANU Procedure: Student Surveys and Evaluations. |

7. Appendix

Signed Memo *Proposed evaluation for Rights, Relationships and Respect Program* to DVC SUE and DVC IC.

8. Conclusion/recommendations

(To be completed by the ANU Privacy Office)

1. This PIA is to be reviewed and updated if any data flow or information handling practices change.
2. CSRM and ANU University Experience staff with access to personal data (or the key) should have completed the Pulse module on privacy before they are given access to personal information in the system.



Roxanne Missingham
Privacy Officer

13 February 2023