

**Privacy Impact Assessment**  
**For**  
**The Student Barometer**

## **Background**

The Student Barometer, comprising the International Student Barometer (ISB) and the domestic Student Barometer (SB), is administered online to ANU students during the first half of the academic year by International Graduate Insight Group Limited (i-graduate), to collect data on students' learning, living experiences and ratings of support services.

A Privacy Impact Assessment (PIA) is required as personal information from students is used for the survey and by the vendor.

## **PIA methodology**

The PIA was developed using the ANU PIA Guideline  
[https://policies.anu.edu.au/ppl/document/ANUP\\_019407](https://policies.anu.edu.au/ppl/document/ANUP_019407)

## **Threshold assessment**

As personal information will be collected, a PIA is required.

## **Project description and information flow**

The survey is used to obtain data for analysis and communication to improve the educational experience at ANU for students.

Step 1. i-graduate generates unique web links equal to the number of students ANU identifies as eligible to participate.

Step 2. ANU associates the personal information of students comprising name and email address with the i-graduate web links.

Step 3. ANU sends students an invitation to participate in the survey using the unique web link.

Step 4. Student fills in the survey

Step 5. ANU is provided with the results.

Step 6. i-graduate deletes the personal data

## **Analysis**

The agreement with i-graduate will contain provisions that ensure compliance with the *Privacy Act 1988 (Cth)*.

ANU staff who have access to the personal information are in Planning and Performance Measurement and all are required to comply with the ANU Code of

Conduct, privacy policy and other policies as they are ANU employees. All have completed the ANU Privacy module in Pulse.

The systems used have an audit log that provide information on access to the data.

The data is de-identified in the ANU system and retained for a period consistent with business needs and the Record Disposal Authority agreed with the National Archives of Australia.

The only personal data sought in the survey is demographics required to assist in analysis and this is not associated with an individual's personal data.

Participants who wish to access or correct their personal information may do so by contacting [evaluations@anu.edu.au](mailto:evaluations@anu.edu.au) or i-graduate.

The survey solution and the systems storing the data in ANU have been approved by the Office of the Chief Information Security Officer.

#	Privacy Impact	Necessity/ Impact Rating/ Impact Response	Impact Treatment Plan
1	Re-identifiable data	Unlikely/Medium /Mitigate	All data is de-identified by Planning and Performance Measurement and stored securely
2	Third Party Tracking	Likely/Low/Mitigate	i-graduate's In Touch Web Portal uses Google Analytics and Google Tag Manager but personal information is not collected by these tools
3	Disclosure of PII	Unlikely/Low/Mitigate	i-graduate does not store personal information and the personal information held by ANU is only stored in the appropriate, approved, student systems.

## Conclusion/recommendations

The collection, use and disclosure of personal information for the Student Barometer is consistent with the ANU Privacy Policy.

Staff handling personal information for the Student Barometer receive appropriate privacy, data governance and systems training to ensure appropriate information handling.

Planning and Performance Measurement are responsible for ensuring that the responses are appropriately de-identified.

This PIA remains a living document. Where there are any major changes to information handling practices by ANU and/or i-graduate, the PIA will be updated and a review of the privacy impacts completed.

Approved by	Roxanne Missingham University Librarian/ANU Privacy Officer Email: <a href="mailto:Privacy@anu.edu.au">Privacy@anu.edu.au</a> Phone: 02 6125 5467
Signature	
Date	19/04/2020