



Australian
National
University

Privacy Impact Assessment

Residential Life Survey

Prepared by:

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1. Executive summary/introduction

Since 2016, the annual Accommodation Survey has been conducted as a Non-Standard Survey undertaken each year to measure the performance on the delivery of services for students in our ANU residences. The survey is distributed to all residences including the Affiliated Colleges.

In 2019 the survey was reviewed by Planning and Performance Management Division (now Planning and Service Performance Division) to reduce the size of the survey and ensure the questions measured the PBSA (Purpose-Built Student Accommodation) agreement KPI.

In 2021, the survey was redesigned and renamed the Residential Experience Survey in collaboration between Residential Experience Division and Planning and Service Performance Division (PSP). At the end of 2022, PSP was given a direction to integrate the survey into their standard suite of student surveys. Given low response rates to the survey collection circle in 2022 and subsequent feedback, it was identified that the survey could still benefit from further refinement and engagement with Residential Experience and residential hall management.

In 2023, the Residential Life Survey, ran for a collection period of two weeks beginning in Week 9 of Semester 1 and 2. In addition, a small module of questions was added to ANU Welcome Survey for all commencing coursework students in Semester 1 2023 who live on campus. This will continue in 2024, with a small module of questions included ANU Welcome Survey in Semester 1 and Semester 2 for coursework students commencing at ANU who live on campus. All students living on campus will be invited to respond to the Residential Life Survey during Semester 2, 2024. The ANU Welcome, and Residential Life surveys are each now ANU Standard Surveys administered by Planning and Service Performance (PSP), providing de-identified, aggregate level student feedback (as relevant) to the Deputy Vice-Chancellor (Academic), the Chief Operating Officer, and the Director, University Experience, and Director, Residential Experience who have provided support (as relevant) for these standard survey instruments.

2. Project description

In the past, the ANU Accommodation Survey had been run anonymously, with all residents invited to participate via their U ID email. The newly designed Residential Life Survey has been identified by PSP to be conducted confidentially for the following reasons:

1. Confidential surveys allow the university to further explore patterns in student feedback (e.g. which types of students have the 'best/worst' residential experience). Knowledge of such patterns can then be used to inform interventions to improve student experience.
2. Confidential surveys allow the questionnaire to be shortened because certain demographic information can be linked to ANU held data. Shortened questionnaires usually correlate with higher response rates. Data linkage also reduces potential data inaccuracy arising when information is obtained from only student responses.
3. Confidential surveys helps promote constructive feedback, advocating the 'ANU feedback culture' that the University aims to embed.
4. Confidential surveys allow ANU to follow up with students when incidents (e.g. claims of misconduct or wellbeing concerns) are reported, so as to help ANU meet its obligation to protect the welfare of its community.

This Privacy Impact Assessment relates to this change of the survey from anonymous to confidential deployment.

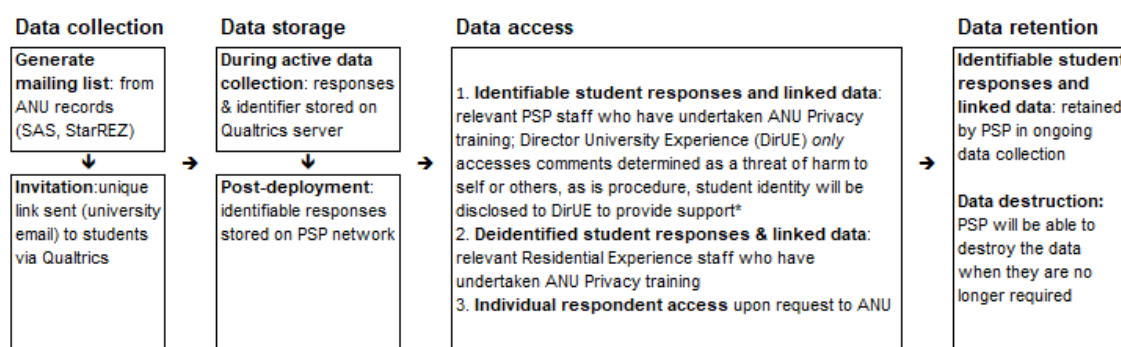
3. Threshold assessment

As personal information is collected, stored, and in certain circumstances used and disclosed in order to administer the Residential Life Survey, a PIA is required.

4. Consultation with stakeholders

This PIA was prepared in consultation with the Planning and Service Performance Division (PSP) and the ANU Privacy Officer.

5. Information flows



*For more detail on how PSP handles identifiable student data, please refer to the Policy: Student Surveys & Evaluations: https://policies.anu.edu.au/ppl/document/ANUP_004601

5.1 Data collection

The earlier iterations of the anonymous survey asked respondents for information regarding whether it was their first year in student accommodation, how they described their gender identity (which they can opt to not disclose), and their student status (level of study of study program i.e. undergraduate, postgraduate coursework of higher degree research, domestic or international, full-time or part-time).

Changing the survey from anonymous to confidential will support the minimisation of the collection of personal information with Residential Life Survey responses, with the aim of mitigating survey fatigue.

In the confidential form, students complete the Residential Life Survey by following a survey link unique to each resident, embedded in an email invitation sent to their university (U ID) email address. This unique survey link and U ID email address will be stored with survey responses, allowing response data to be linked back to university administrative records in order to populate the personal information for the purpose of analysis.

This process of attaching UID to survey responses is similar to that used with other standard survey data sets held by PSP on behalf of ANU, (e.g. SELT and QILT surveys). As with other standard surveys, the purpose is to enable Residential Life Survey data to be linked with other data sources held by ANU (e.g. enrolment information).

How will the personal information be collected?

The mailing list of invitees is drawn from ANU-held student information systems (StarRez, ANU Student Administration System). The purpose of the survey is to collect information directly related to residents' experience with ANU accommodation.

Survey responses are managed on a consent, opt-in basis because all items are optional for students, who may answer as many or few questions as they choose. The only exception to this are the questions that 1) ask if the student lives in an ANU residence (asked of commencing students), and 2) ask for identification of the respondent's residence (asked of all students living in ANU residences). Responses are required for these questions because this survey aims to understand the residential experience broadly, but also the specific experience within difference residences. Accurate information regarding residence is important to exploring these specific experiences.

5.2 Data management

How will the personal information be stored?

During survey deployment, Residential Experience Survey responses are stored on the ANU CISO-endorsed, Australian-based, Qualtrics server. After survey deployment, personally (U ID) identifiable data will be downloaded then deleted from this server, and stored onsite in local shared drives within PSP.

How will the personal information be secured/protected?

ANU security policies mean access to the relevant ANU drives is limited to authorised PSP staff. Unit record (student level) data shared with other authorised ANU departments will have identifiers (ANU U ID email and Qualtrics unique link) removed prior to sharing.

Who will have access to the personal information?

Residential Life Survey data with personal identifiers is only accessible to authorised staff within PSP.

As per the [ANU Data Governance Procedure](#), the custodian of ANU Residential Life survey data is the Institutional Research team within PSP. Accordingly, Institutional Research administer and manage the information on behalf of the Executive Steward, Chief Operating Officer.

All reporting of findings will be at the aggregate level, without identifying individual information, ensuring no individual is identifiable or potentially identifiable from the data.

However, use and/or disclosure of personal information will only be permitted in very limited circumstances. Broadly, where data collection identifies an allegation of misconduct or wellbeing concerns, personal information may be referred to the Director, PSP (or nominee) for decision to contact the individual.

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

Respondents can request the correction of their personal information by writing to the PSP Institutional Research team (evaluations@anu.edu.au).

Are participants informed of and give consent for all proposed uses of the personal information?

Invitations are sent via email to students University email account and this outlines the proposed uses of the personal information, links to the Privacy Impact Assessment and Participant Information Sheet for the Residential Life Survey with recommendation to review these documents before proceeding with survey responses. The ANU Privacy Policy is linked in both documents for students to reference.

When will the personal information be deleted/destroyed?

The personal information will be retained until the record is deleted or destroyed by the data custodians (PSP and Residential Experience).

Personal information collected in the survey will be deleted/destroyed according to ANU data retention policies and the appropriate Records Disposal Authority.

5.3 Data reporting

All reporting of findings will be at the aggregate level, without identifying individual information, ensuring no individual is identifiable or potentially identifiable from the data. The reporting may include 'quick-look' survey outcomes, high-level summary reports that may be made available to university executives/committees, Residential Experience, residential halls management, and ANU students and staff.

6. Privacy management

#	Privacy Impact	Necessity/Impact Rating/Impact Response	Impact treatment Plan
1	Collection: Personal information will be collected without a clear purpose, which could increase the risk of unauthorised uses and disclosures.	Necessary/Low/Mitigate	Collection, use and disclosure of personal information collected from Residential Life Survey responses will be handled in accordance with the ANU Privacy Policy , the Student surveys and evaluations policy and the Student surveys and evaluations procedure for the clear purpose of improving the Residential Life experience.
2	Collection, use or disclosure: Consent for collection, use or disclosure of information may not be valid	Necessary/Moderate/Mitigate	Residential Life Surveys are optional for students and they may answer as many or few questions as they choose. Students will be informed of the information handling practices in the Residential Life Survey instructions, to provide informed consent.
3	Use or disclosure: Individuals may be surprised or upset by a secondary use or disclosure, resulting in privacy complaints and/or negative publicity	Necessary/Moderate/Mitigate	PSP are implementing a communications plan to advise students of the change to information handling practices, including: <ul style="list-style-type: none"> • Email notifications • Guidance on the University website • Updated privacy advice in Residential Life Survey instructions. There will be no secondary use.
4	Use or disclosure: Residential Experience Survey feedback is not appropriately de-identified	Necessary/Low/Mitigate	PSP are responsible for providing analysis of Residential Life Survey feedback and have business processes for ensuring appropriate de-identification of Residential Life Survey responses.

5	Use or disclosure: The personal information will be stored in an unsecure system that can be accessed by users not approved to view the personal information	Necessary/Low/ Mitigate	Records will be stored alongside other similar collections at ANU. PSP are bound by the relevant ANU policies to protect personal information. Data will be retained consistent with the ANU's record retention policy (as agreed with National Archives of Australia)
6	Individuals are not able to easily access and correct their personal information or have it deleted	Necessary/Low/ Mitigate	Individuals are advised they may request to see what personal information is associated with their Residential Life Survey record. They can correct their personally identifying information through ISIS or by contacting Student Central. If individuals would like their personal data (or the whole response) deleted, PSP will be able to do so.

7. Conclusion/recommendations

Conclusion

The overall privacy impacts from the proposed change from anonymous Accommodation Survey to confidential Residential Experience Survey to the 2023 Residential Life Survey, on information handling practices is minor. The primary impact is that students must be made aware of the change in handling practices, to ensure they provide informed consent when opting in to Residential Life Surveys.

The information handling practices of the Residential Life Survey are compliant with the ANU Privacy Policy. The personal information collected will be managed in accordance with ANU privacy requirements.


Survey invitations will clearly outline the proposed uses of the data collected from survey participants.

Staff handling personal information will complete or have completed the ANU Privacy Awareness training in Pulse.

This PIA remains a living document and will be reviewed and updated as required, should the information handling practices of the ANU.

Recommendation

1. This PIA be reviewed and updated if any information handling practices for Residential Life Survey change.
2. All ANU staff with access to personal information will complete the ANU Privacy Awareness training module in Pulse.
3. This PIA will be made available on the [Residential Life Survey webpage](#) (available to ANU staff and students) and to any student, on request.
4. Guidance be provided to students to ensure they understand privacy issues including data correction/deletion. PSP to ensure that privacy information is clear and accessible on the University website and in the Residential Life Survey instructions before students commence Residential Life surveys. PSP to consult relevant areas on communications plan, including Residential Experience and residential hall management.

Approved by:	
Name/position	Roxanne Missingham, University Librarian/ANU Privacy
Signature	
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