



Australian
National
University

Privacy Impact Assessment

Release of graduate information online

August 2019

Document Approval

Supported by:

..... Date:

(Ariel Edge, Registrar, Division of Student Administration and Academic Services)

Approved by:

..... Date:

(Roxanne Missingham, Privacy Officer)

1. CONTACT DETAILS

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2. PROJECT DESCRIPTION

ANU releases information about graduates online through Graduate Search at <https://www.anu.edu.au/students/program-administration/program-management/graduate-search>

The data available via Graduate Search is:

Full name	Award title	With Honours (as appropriate)	Thesis Title (as appropriate)	Conferral date
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The data provided includes personal data (name) and provides an effective means for individuals to provide evidence of their graduation from the university. Degrees awarded by a University are a matter of public record.

The provision of this information through Graduate Search is consistent with the ANU Privacy policy that states:

1. We collect, hold, use and disclose your personal information to enable us to meet legal obligations and for a range of internal University purposes. These include:
 - a. for students, to administer your admission, enrolment, academic progress, academic integrity, discipline, graduation, accommodation, access to University facilities and services, library loans, fees, visa, immigration, taxation and financial support purposes, and in relation to graduates, for alumni activities;
2. Common situations in which we disclose personal information include...the record of a person's graduation from the University is a public document

3. Threshold assessment

As personal information is stored and disclosed a PIA is required.

4. Consultation with stakeholders

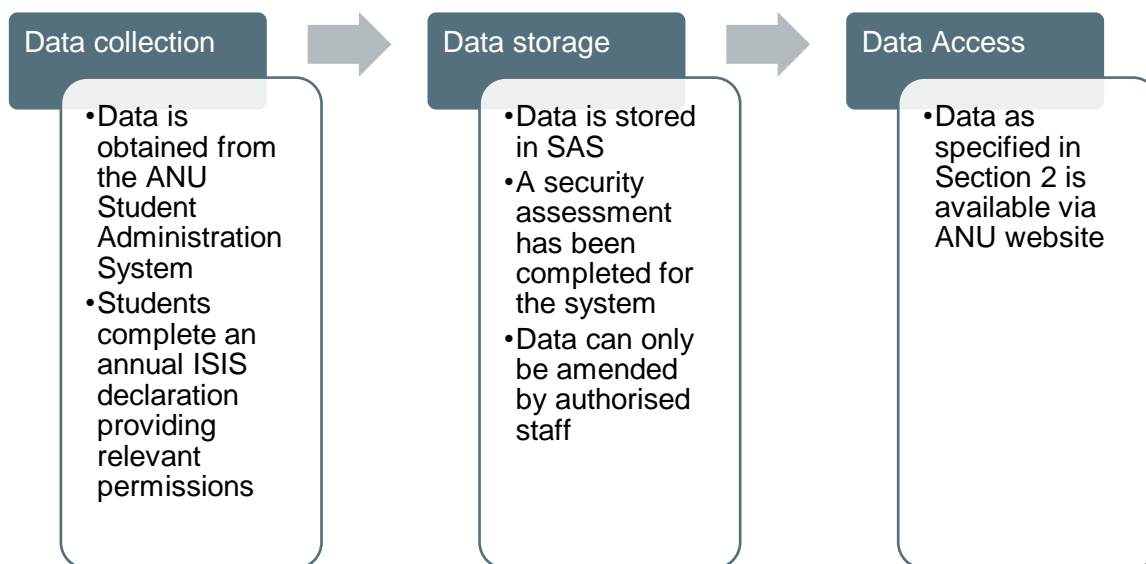
The Privacy Impact Assessment has been prepared consistent with the [ANU Guideline: Privacy Impact Assessment](#) with consultation with the following:

- relevant staff in the Division of Student Administration and Academic Services. ANUSA and PARSA.

The Privacy Impact Assessment will be reviewed by the Division of Student Administration and Academic Services if a new system is implemented to replace the current system or if there is a significant upgrade, for example a new version.

5. INFORMATION FLOWS

At a high level the information flows are:



The Integration Student Information System (ISIS) declarations for international and domestic students are attached.

5.1 DATA COLLECTION

Data is collected from the ANU Student Administration System.

The personal information that is provided for Graduate Search is name.

The complete list of data elements is:

- Student Name
- Coursework award, including Honours or
- research award and thesis topic
- Conferral Date

Only personal data that is relevant is collected from the ANU Student Administration System. Multiple degrees awarded relevant to the person will be included.

An individual can request that data be corrected if there is incorrect data per the University Privacy Policy by contacting student@anu.edu.au. Changes to graduates record must be approved by the Registrar, Student Administration and Academic Services. Contact details are on the web page for Graduate Search.

5.2 DATA MANAGEMENT

The data is populated on the Graduate Search website through a Drupal database from data extracted from records held in the Student Administration System as follows:

- The Division of Student Administration and Academic Services creates the degree record within SAS based on College approval that program award requirements are satisfied and allocates graduands to ceremonies for conferral.
- The ceremony date is recorded as the conferral date.
- If a graduand decides to not attend a conferring ceremony, the degree or award to which they are entitled is conferred in absentia.

The Division of Student Administration and Academic Services is responsible for

Managing access to SAS

- Approving and activating user accounts in SAS
- Removing access to users who change role or leave the University
- Maintaining up to date records of user access, reviewed bi-annually and conforms to the [ANU Standard: Enterprise system management](#).
- Staff with access include staff in Division of Student Administration and Academic Services, Colleges/Schools, and designated users in partner service divisions (e.g., IT Services).
- Access is individual password controlled and conforms to ANU ITS/CISO security policy and procedures, which are routinely reviewed.

Training to support users

- Training and support for the system is provided through training materials sessions, online information, user forums, helpdesk support, graduate process and washup meeting. Training materials are available on Wattle and SharePoint Student Admin Practitioner's site.
- Access may be removed in the event of non-compliance to training requirements.

Data accuracy

- Corrections to data are made by authorised staff with information about the change (the request and advice about completion of the correction where that correction is required) is recorded in the Electronic Records Management System.
- An audit trail is maintained by the Student Administration System.
- An incident reporting mechanism is in place and subject to review by the University Academic Quality Assurance Committee.

Data disposal

- Disposal of data occurs in accordance with ANU Records and Archives Management Policy and the ANU Records Disposal Authority which determines the classification and retention requirements.

5.3 Privacy impact analysis and compliance check

Release of this data through Graduate Search is consistent with its status as a matter of public record and the ANU Privacy Policy.

6. PRIVACY MANAGEMENT: addressing the risks

This section provides an analysis of how the Graduate Search data may impact upon privacy, both positively and negatively.

#	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.	Unlikely/Low/Mitigate	Data is collected consistent with the ANU Privacy Policy. Data is collected to support education of the student. These purposes are clearly described on the student website and in the ANU Privacy policy.
2	Collection, use or disclosure: Consent for collection, use or disclosure of information may not be valid	Necessary/ Moderate/ Mitigate	Review demonstrates consent is sufficiently met through the student declarations completed on ISIS as part of the enrolment process which is completed annually by the student.
2	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	Data is not supplied to any third parties or for secondary purposes except where required under legislation eg government reporting. Students are made aware of the specific information which is made available on the worldwide web.
	Information security: The organisation or agency does not have basic information	Necessary/ Moderate/ Mitigate	Data does not require information security as the purpose is public accessibility.

	security standards in place.		
	Access and correction: Individuals are not able to easily access and correct their personal information.	Necessary/ Moderate/ Mitigate	Students and graduates are supplied with information on the website as to how to have data corrected; and an audit trail of corrections is maintained..
	Information quality: Poor quality information may lead to inappropriate decisions that have a negative impact on the individuals concerned.	Necessary/ Moderate/ Mitigate	Information is obtained from the Student Administration System without alteration.

7. Recommendations

The system providing access to the data is consistent with the ANU Privacy Policy and the primary purpose of the provision of the data.

Some small changes to the website were identified through the process of developing the PIA:

- In policies list change “[Protection of Personal Information policy](#)” to “Privacy Policy” as that is the actual name of the policy. Actioned August 2019
- Provide a statement that any feedback to correct data should be made to the contact.
- Change wording “is authorised through the University's Protection of Personal Information policy.” To “is consistent with the University's Privacy policy”.
- Include advice on the “Eligibility to graduate” website that graduate names, year of conferral and award will be published on the Graduate Search page. Actioned August 2019

Attachment: ISIS declaration

International student form:

Australian National University

Terms and Conditions of Enrolment

Please read the University **Terms and Conditions of Enrolment** set out below.

ISIS Enrolment

Unless I am taking leave or completing my program at the end of first semester, I will enrol in classes for the entire year. I am responsible for ensuring the classes in which I enrol will count towards my degree program requirements. I will use [Programs and Courses](#) to identify courses that meet my program requirements. Additional advice is available from my ANU College/School/Program office.

Statutes and Rules

I agree to abide by the [Rules and Statutes](#) of the University and to comply with orders and directions made by the constituted authorities of the University.

University Policies and Procedures

I confirm that I have read and agree to abide by the [University Policies and Procedures](#).

Program Administration Procedures

I am aware of the enrolment guidelines and procedures as outlined at [Program Administration](#) and the [Coursework Awards Rule](#) (for undergraduate and postgraduate coursework students) or the [Research Awards Rule](#) (research students), and acknowledge that it is my responsibility to familiarise myself with my degree program requirements and administrative procedures published by the University.

University Communications

I understand that the University will communicate with me by mail, telephone or electronically and agree to keep the University informed of my current address and contact telephone number. I will

inform the University within 10 working days of any change to my contact details during my degree program.

I will regularly check my University e-mail, ISIS, and the ANU student website. I will use my University email to communicate electronically with the University. I understand that the University will invoice fees through ISIS and if I am Commonwealth supported, or receive Commonwealth assistance, I consent to receiving my Commonwealth Assistance Notice from the University electronically.

If I am an International student visa holder I understand that I must provide an Australian residential address and I understand that I will be in breach of my student visa conditions if I fail to provide an Australian residential address or inform the University of any change of my contact details within 10 working days.

Confidentiality of Information

I understand that the information about me held by the University will be used by the University in accordance with the [Privacy Policy](#).

Intellectual Property Policy

I agree to abide by the [Intellectual Property Policy](#) of the University.

Use of Third Party Online Services

I understand the University has made a number of third party, online, software services available for students to use. Use of each third party software service is conditional on me first agreeing to the licensor's end user licence agreement/terms of service and/or privacy policy. I should read these carefully.

In some cases I will be required to register an account with the software service licensor and submit personal information, including my: first name; last name; University ID; University email address; and other information.

In cases where I am asked to submit 'content' to a software service, such as an assignment or short answers, the licensor may only use my 'content' in accordance with the end user licence agreement/terms of service – including any (copyright) licence I grant to the licensor.

Any personal information or content I submit may be stored by the licensor, potentially offshore, and will be used to process the software service in accordance with the licensors end user licence agreement/terms of service and/or privacy policy.

If I choose not to agree to the licensor's end user licence agreement/terms of service or privacy policy, I will not be able to access and use the software service. In these circumstances I should contact my lecturer to enquire about alternative arrangements that are available.

Visa Verification

I confirm that I am on a 500, 573, 574, 575 or 576 visa

OR

I have provided my visa details to ANU Student Central or emailed a copy to

policy.regs@anu.edu.au

*If you choose not to accept the **Terms and Conditions of Enrolment** you will not be able to continue with enrolment at the University*

Domestic student form

Australian National University

Terms and Conditions of Enrolment

Please read carefully the University **Terms and Conditions of Enrolment** set out below.

ISIS Enrolment

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*If you choose not to accept the **Terms and Conditions of Enrolment** you will not be able to continue with enrolment at the University*