

Privacy Impact Assessment for Qualtrics

1. Background

Qualtrics is a surveying software used across the Australian National University (ANU). As of October 2019, ANU used the default terms of service for Qualtrics. This privacy impact assessment (PIA) identifies existing privacy risks and considers alternative, less privacy-intrusive practices. Additionally, it covers the sharing of personally identifiable information (PII), the flow of that PII through Qualtrics, and potential PII privacy risk and mitigating actions.

2. PIA Methodology

The PIA was developed by an administrator in the Evaluations Team of the Planning and Performance Measurement Division (PPM). It involved consulting other members of the team, the internal ICT Strategic Procurement and Contracts team, and the product vendor.

2.1 List of Stakeholders

Below is the list of key stakeholders.

- The **system business owner** is Richelle Hilton (Director of PPM).
- Information Technology Services (ITS) support the system.
- Qualtrics is used across Colleges, Schools and Divisions.
- Survey respondents are individuals internal and/or external to the ANU.

3. Project description

3.1 Description of Qualtrics

Qualtrics is a surveying software that allows authorised users to create online surveys and deploy them via anonymous links, emails, personal links, social media or a QR code. Qualtrics then tracks the survey response rate, configures customised reports, and makes a local record of the raw data available for users to conduct further analysis and reporting (see *Figure 1*).

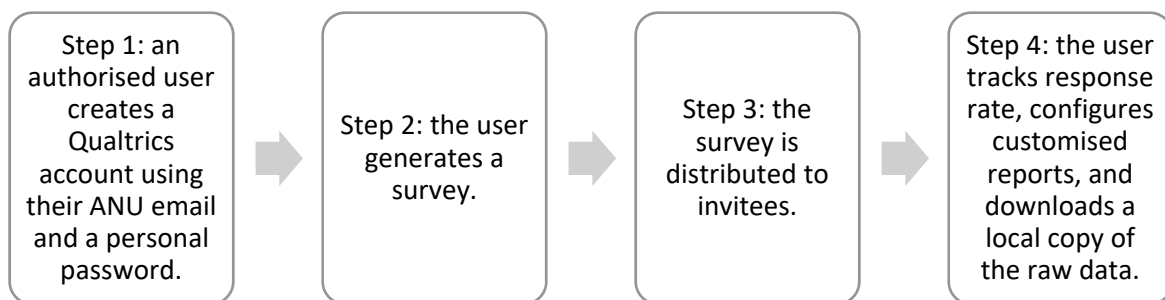


Figure 1. Process of data collection in Qualtrics.

3.2 Personal Information Flows

User PII. The user provides their ANU email address to create an account on Qualtrics. No other personal information is collected for the purposes of the account.

Respondent PII. Respondent PII can be uploaded by either the user or the respondent.

Respondent PII from ANU systems be uploaded by users to support deployment for invitations (e.g. names and e-mail addresses), sampling (e.g. demographic characteristics for stratified sampling), minimising survey length and/or managing bias arising from demographic items. Users also have the

option to disable default temporary third party tracking technology collection of IP address and location data (details [here](#)).

PII uploaded by respondents (internal or external to the ANU) is voluntary and manually entered into Qualtrics by the respondent.

3.3 Storage

Data uploaded into Qualtrics is hosted in the cloud server environment of the vendor. The ANU Chief Information Security Officer has assessed and approved the system as compliant with ANU cybersecurity requirements on 01 October 2019.

3.3 Access

Access to data held in Qualtrics is controlled via user accounts.

In addition to following standard ANU policies arising from the Enterprise Agreement (e.g. requirement to complete the ANU Privacy module on PULSE), the ANU 'Student Survey and Evaluations' policy and procedure requires all student surveys be reviewed by the Evaluations team in support of consideration and approval by Director PPM prior to being deployed through Qualtrics. Surveys sent to staff are similarly reviewed by the Evaluations team in support of consideration and approval by Director HR prior to being deployed through Qualtrics. The review of a proposed survey includes the Privacy Officer where appropriate. Where Qualtrics is being used as a tool in support of a research purpose, the protocol is reviewed by the ANU Human Research Ethics Committee.

4. Analysis

Listed below are possible risks associated with Qualtrics as a survey software and their existing or recommended solution.

#	Privacy Impact	Necessity/ Impact Rating/ Impact Response	Impact Treatment Plan
1	Users may collect or use data inappropriately	Unlikely/Low/Mitigate	Throughout collection and analysis, users must abide by the conditions detailed in the following ANU policies: student surveys and evaluations , acceptable use of information technology , account management and access , privacy , code of conduct , information technology security , and ANU enterprise agreement .
2	Uploading PII	Unlikely/Low/Mitigate	Uploading of PII can be integral to data collection activities (e.g. matching responses over time). This risk is mitigated through the survey design and review process to ensure PII is handled in a manner consistent with the APP (e.g. secure data storage in Australia).
3	Third Party Tracking	Likely/Low/Mitigate	Qualtrics uses cookies and Google Analytics, both of which can be useful for research purposes. Where there is no legitimate need for such tracking, users should disable collection of IP addresses during survey set-up, typically mitigated as part of review processes.

4	Disclosure of PII	Unlikely/Low/Mitigate	Qualtrics does not sell or rent contact information to other vendors. Qualtrics only discloses information as legally required by law enforcement or government agencies for national security or other issues of public importance. Any disclosure of information within Qualtrics is strictly to assist with technical or customer service issues.
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5. Recommendations

Qualtrics provides significant business benefits to ANU and is already used widely within the ANU, including by academic researchers and by ANU central divisions. Further, it is widely used by other universities both nationally and internationally, such as the University of New South Wales and Harvard.

As such, Qualtrics is deemed fit for its purpose at the ANU.