



STUDENTSURVEY.IE

IRISH SURVEY OF STUDENT ENGAGEMENT

DATA PRIVACY IMPACT ASSESSMENT

August 2025

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1. INTRODUCTION

- 1.1 This Data Protection Impact Assessment (“**DPIA**”) was originally carried out in 2021 by StudentSurvey.ie (“**StudentSurvey.ie**”) with assistance from Ronan Daly Jermyn (“**RDJ**”) in relation to the data protection implications for StudentSurvey.ie of the activities it undertakes as part of the Irish Survey of Student Engagement on an annual basis (the “**Project**”). This DPA was then updated in August 2025 by the Higher Education Authority (HEA, “we”, “us”, “our”). This DPIA has been conducted pursuant to data protection law and, in particular, Article 35 of Regulation (EU) 679/2016 General Data Protection Regulation (the “**GDPR**”).
- 1.2 As part of this DPIA, StudentSurvey.ie completed a Preliminary Assessment Questionnaire (“**PAQ**”) and a Supplementary Assessment Questionnaire (“**SAQ**”). The PAQ was intended to determine whether a more extensive DPIA was required, with the SAQ prepared as a document bespoke to the Project and with the purpose of expanding on the responses to the PAQ. Each of the PAQ and the SAQ are attached at Appendices 1 and 2, respectively.

2. BACKGROUND TO THE PROJECT

- 2.1 As part of the Project, StudentSurvey.ie runs two surveys of students of participating higher education institutions (“**PHEIs**”), being:
- (a) general survey of undergraduate students and taught postgraduate across PHEIs; and
 - (b) survey of postgraduate research students (Masters by Research and PhDs).
- 2.2 The purpose behind the surveys is to provide benefits to each PHEI and its students by helping to improve feedback and appropriate follow up action. By way of example, objectives identified for the taught undergraduate survey include:
- To increase transparency in relation to the student experience of and engagement with higher education;
 - To enable direct student input in expressing their experience and engagement with their higher education institution;
 - To ensure that the student voice is heard and acknowledged, with an ongoing partnership to ensure impact from the survey findings, between individual higher education institutions and students’ unions;
 - To facilitate higher education institutions’ efforts to reflect that engagement and those experiences in their policy and practice in an impactful way;
 - To help institutions identify areas of strength in how students engage, so they can continue and strengthen these practices;
 - To help institutions identify areas requiring further development or improvement in how students engage so they can respond;
 - To serve as a guide for continual enhancement of institutions’ teaching and

- learning and student engagement;
- To facilitate comparison with other higher education systems nationally, sectorally and internationally.

StudentSurvey.ie is a non-formal collaborative partnership co-sponsored by the HEA the Irish Universities Association (IUA), Technological Universities Association (TUA) and Aontas na Mac Léinn in Éirinn (AMLÉ). A single technical survey contractor conducts StudentSurvey.ie on behalf of the co-sponsoring organisations.

- 2.3 In 2024, the administration of Student Survey.ie was transferred from THEA (Technological Higher Education Association) to the HEA, who manage the contract with the technical survey contractor.
- 2.4 The surveys themselves are carried out by a third-party survey services provider (the “**Survey Company**”) pursuant to a contract for services in place between the HEA and the Survey Company. The Survey Company is selected via a Europe-wide procurement process using e-tenders. A StudentSurvey.ie technical group reviews all submissions via this tendering process and selects a winner based on a pre-determined scoring system. The incumbent Survey Company’s contract is due to expire in October 2026.
- 2.5 The process for the conduct of the surveys as part of the Project is set out in full in the PAQ and SAQ, and thus it is not proposed to describe the process in full here. Nonetheless, note the key element of the Project for the purposes of this DPIA, being that each PHEI transmits all information on students necessary to arrange and carry out each survey directly to the Survey Company. Following the carrying out of the relevant survey, the Survey removes all identifiers, including student names, identification numbers and exact dates of birth (as further detailed in the PAQ and the SAQ) such that individual students are no longer identifiable. This removal of identifying information occurs prior to StudentSurvey.ie receiving any information from the Survey Company.
- 2.6 The incumbent Survey Company carried out its own DPIA on the Project in February 2020. The Survey Company acts as a data processor over any personal data received by it from PHEIs as part of the provision of its services and enters into individual data processing agreements with each PHEI.

3. **CONCLUSIONS**

- 3.1 The Project does not involve the receipt of any personal data by the HEA. The key factors giving rise to this position are as follows:
 - (a) as noted above, PHEIs share background information on students necessary to facilitate the conduct of each survey with the Survey Company directly, via secure means described in more detail in the SAQ;
 - (b) following the receipt of all responses to a particular survey, the Survey Company undertakes an exercise whereby all information identifying each

student, (being name, student number and exact date of birth) are removed from compiled response data;

- (c) each student is assigned a unique ID, matching that student through a key held only by the Survey Company;
- (d) it is at this stage **only** that the data (with identifying information removed) is shared with StudentSurvey.ie for quality assurance purposes; and
- (e) StudentSurvey.ie is not capable of identifying individual students from the information received from the Survey Company in accordance with (d) above and is further not capable of combining the information it receives with any other information in order to identify students; it has no such information at its disposal;
- (f) the Survey Company is instructed by the StudentSurvey.ie Team to delete the file containing the demographic data fields (which will contain data for students who completed the survey and for those who did not) six months following the close of survey fieldwork; and the Survey Company is also instructed by the StudentSurvey.ie Team to delete the key used to match the student ID with their anonymous alpha-numerical code circa six months after the close of survey fieldwork.

3.2 Residual risks have been identified in Sections 5 and 6 of the SAQ, with mitigating steps identified where necessary. RDJ also made the following recommendations to StudentSurvey.ie when it originally carried out the DPIA:

- (a) update StudentSurvey.ie's privacy statement to more accurately reflect the Project's process from a data protection perspective;
- (b) take all possible actions to ensure that PHEIs do not inadvertently share any personal data with StudentSurvey.ie, including:
 - (i) regular reminders to each PHEI of the means by which background data on students is to be provided to the Survey Company;
 - (ii) regular reminders to each PHEI that StudentSurvey.ie is has no basis to receive any personal data of students and any such provision of personal data by PHEI will constitute a personal data breach, as such term is defined in the GDPR; and
 - (iii) ensure appropriate and regular training for members of StudentSurvey.ie staff and working groups in order to ensure that all personnel are aware of the role of StudentSurvey.ie in the Project from a data protection perspective;
- (c) engage in regular review and audit of the processing of personal data by the Survey Company and its adherence to the procedure sets out in its

agreement with the HEA, its data processing agreements with each PHEI, its confidentiality agreement with the HEA and its own data protection impact assessment and other identified processes for the management of personal data processing as part of the Project.

- 3.3 As a final note, this DPIA should not be taken as a settled statement of the position of Project from a data protection standpoint. DPIAs, whilst conducted at a certain point in time, are only accurate as of that date, both in a legal and a factual sense. StudentSurvey.ie must continue to monitor and assess the Project and its effect on the data protection and privacy rights of students for as long as the Project is carried out in order to meet its obligations under data protection law.

APPENDIX 1

Appendix 1.1 Preliminary Assessment Questionnaire

The processing of personal data by StudentSurvey.ie as part of the Irish Survey of Student Engagement (the “Project”)

This questionnaire should be filled out at the start of any project involving the use of personal data or when making a significant change to an existing process in order to determine if a full DPIA should be carried out and to document the process by which the decision to carry out a DPIA was reached. The responses to the PAQ will also feed into the remainder of the DPIA, including both the Supplemental Assessment Questionnaire and, if required, RDJ’s Final Report. A sufficient understanding of the project is required in order to decide on the approach to the DPIA, and the preliminary assessment will form the basis for the detailed assessment of the risks as the DPIA progresses.

Those questions highlighted in yellow indicate where a positive response may bring the activity within the scope of the situations specified explicitly: (i) under Article 35 of the GDPR as requiring a DPIA; or (ii) by the Office of the Data Protection Commission in its guidance document on data processing operations that require a DPIA dated 15 November 2018, prepared and published pursuant to Article 35(4) of the GDPR.

QUESTIONNAIRE

NO.	QUESTION	ANSWER
	<p>Please provide a summary of the Project, including the purpose(s) of the Project, details of key stakeholders and timelines and the benefits to the business/stakeholders.</p>	<p><i>This summary needs to provide enough detail so that someone who has no background to the request will understand the reason for it, the relevant teams involved, why it is needed and the urgency. If you have documents which may be relevant or useful in describing the Project, please include these with the completed checklist and refer to same here.</i></p>
<p>1.</p>	<p>NATURE OF THE PERSONAL INFORMATION BEING CAPTURED OR USED IN/FOR THE PROJECT</p>	
<p>3.4</p>	<p>Does the Project entail the processing of personal information (i.e. ‘personal data’)? If so, please provide details.</p>	<p>Nature and Purpose of the processing</p> <p>The survey company (being the Data Processor) will process personal data submitted, stored, sent or received by the individual higher education institutions (each being a Data Controller) via the contract for services between the Higher Education Authority (“HEA”) and the survey company (the “Services Contract”) for the purposes of providing the Services¹ to StudentSurvey.ie in accordance with the Services Contract.</p> <p>The HEA, being one of the sponsors of the StudentSurvey.ie partnership, regularly collects a range of data from institutions it works with. Students in institutions that take part in StudentSurvey.ie are presented at registration with the HEA data collection notice which explicitly names StudentSurvey.ie (Irish Survey of Student Engagement) as forming part of its processing activities.</p>

¹ “Services” under the Services Contract includes student survey set up and administration, fieldwork, training and support services and technical infrastructure.

		<p>Some non-sensitive personal background data, collected by the institutions for the purposes of (among others) sharing with the HEA for the 'Student Record System', is then also sent by the institutions directly to the Data Processor (please see below for the full list of fields).</p> <p>Students who fall into the categories being included in the survey (undergraduate students, postgraduate students (including taught and research)) are invited to take part through an email sent by the Data Processor on behalf of the institution. Participation is voluntary but is encouraged by the institution.</p> <p>Students who choose to participate in the survey may click on a personalised link from the email to a purpose-built website. Alternatively, students may access the survey through a general link on the StudentSurvey.ie website and enter some identifier information. These steps are taken to ensure each student's personal background data are matched to their answers on the survey.</p> <p>Students may then complete the survey. Responses are saved regularly. This allows the students to complete part of the survey at one time and complete it at another time. It also means their answers are taken into consideration even if they do not finish the survey.</p> <p>The Data Processor undertakes the survey and removes identifiable information (name, student number and birth date information) and assigns each student with a unique ID. Date of birth is replaced with year of birth. The Data Processor then sends this anonymised data in this format to the StudentSurvey.ie Team for further quality assurance checking. Following this quality assurance process, the Data Processor provides secure access to each institution</p>
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		<p>separately to the responses from survey respondents enrolled in that institution.</p> <p>Types of personal data to be processed by the Data Processor as part of the survey for first and final year undergraduates and taught postgraduates, as well as the survey for postgraduate research students, are listed below. As noted above, not all of this data is shared with StudentSurvey.ie; rather, the personal data highlighted in red below is removed by way of deletion by the Data Processor, with the remaining data (being the responses to the survey, the unique ID assigned to the student and the data not highlighted in red below) being provided to StudentSurvey.ie in the format noted above.</p> <p>StudentSurvey.ie is not capable of combining the information it receives with any other information in order to identify students; it has no such information at its disposal.</p> <p>StudentSurvey.ie</p> <ul style="list-style-type: none">• Student first name (optional)• Academic Unit 1 (school, college or equivalent; optional)• Academic Unit 2 (department, faculty or equivalent; optional)• Student email address• Student ID• Institute code• Course code• Student date of birth (replaced with year of birth)• Student gender – categorised as male, female, undeclared (includes both gender non-binary and prefer not to say)
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	<ul style="list-style-type: none"> • Student code – categorised as new entrant, re-enrolled, repeat or transferred from another course/ institution • Mode of study – categorised as full-time, part-time, distance learning, E-learning, or in-service education • Programme type – categorised as Undergraduate General Degree, Undergraduate Honours Degree, Undergraduate Diploma, Undergraduate Certificate, Postgraduate Diploma, Postgraduate Certificate, or Masters Taught (Postgraduate) • NQAI classification of programme/ level of study - categorised as Higher Certificate HETAC and DIT/Advanced Certificate (FETAC), Ordinary Bachelor Degree, Honours Bachelor Degree/Higher Diploma, or Masters Degree/Postgraduate Diploma • Non-Standard attendance - categorised as Exam-only, Postgraduate Qualifier, Visiting/Occasional/JYA 1 Term, Visiting/Occasional/JYA 2 Terms, or Visiting/Occasional/JYA Full Year • Exchange - categorised as Erasmus/Life-Long Learning Programme outgoing, or Other Exchange outgoing • Course title • Field of Study – the course is categorised into one of the ISCED (International Standard Classification of Education) categories • Student year of study • Student domiciliary of origin – country of birth/ where student came from before studying in Ireland • Student county – current address by county if domiciliary of origin is Ireland
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		<ul style="list-style-type: none"> • Student postal code – if county is Dublin, further refined by postal code • • Entry basis – the basis on which the student entered higher education <p>PGR StudentSurvey.ie</p> <ul style="list-style-type: none"> • Student first name (optional) • Academic Unit 1 (school, college or equivalent; optional) • Academic Unit 2 (department, faculty or equivalent; optional) • Student email address • Student ID • Institute code • Course code • Student date of birth (replaced with year of birth) • Student gender – categorised as male, female, undeclared (includes both gender non-binary and prefer not to say) • Student code – categorised as new entrant, re-enrolled, repeat or transferred from another course/ institution • Mode of study – categorised as full-time, part-time, distance learning, E-learning, or in-service education • Programme type – categorised as Masters Research, or PhD
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		<ul style="list-style-type: none"> • NQAI classification of programme/ level of study - categorised as Masters Degree, Postgraduate Diploma, Doctoral Degree, Higher Doctorate • Non-Standard attendance - categorised as Exam-only, Postgraduate Qualifier, Visiting/Occasional/JYA 1 Term, Visiting/Occasional/JYA 2 Terms, or Visiting/Occasional/JYA Full Year • Exchange - categorised as Erasmus/Life-Long Learning Programme outgoing, or Other Exchange outgoing • Course title • Field of Study – the course is categorised into one of the ISCED (International Standard Classification of Education) categories • Student course year • Student domiciliary of origin – country of birth/ where student came from before studying in Ireland • Student county – current address by county if domiciliary is Ireland • Student postal code – if county is Dublin, further refined by postal code • Residence – categorised as Parental Home, College Accommodation (includes off-campus), Rented Accommodation, Own Home (house, apartment), Other Accommodation, Not Specified
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3.5	Describe the flow of personal data under the Project. Please use whatever means is most appropriate to do this – diagrams, maps, etc.	Please see Appendix 3.
3.6	Does the Project involve processing any legally sensitive information/‘special category’ personal data? If so, please provide details.	No.
3.7	Does the Project involve processing any privacy-sensitive categories of personal data (e.g. financial data)? If so, please provide details.	No.
3.8	<p>Does the Project involve:</p> <p>a) consolidation or matching of data from several sources;</p> <p>b) compelling data subjects to provide the personal data (i.e. without choice whether or not to provide);</p> <p>c) new ways of identifying individuals using the personal data (‘data subjects’); and/or</p> <p>d) new types/classes of personal data which the organisation has not processed prior to now?</p>	<p>a) No.</p> <p>b) The personal data are provided by the higher education they are registered in for all students invited to take part, therefore yes.</p> <p>c) No.</p> <p>d) No.</p>
3.9	Does the Project involve:	a) Approximately 170,000 students are invited to take the survey.

	<p>a) personal data from a large number of data subjects;</p> <p>b) large amounts of specific personal data about data subjects;</p> <p>c) many different types of information about data subject;</p> <p>d) processing personal data for purpose(s) other than those for which it was initially collected; and/or</p> <p>e) prolonged, or ongoing, processing?</p>	<p>b) Specific personal data relating to those students is provided by all participating higher education institutions (20 at present)</p> <p>c) All points of information collected for both surveys are listed above.</p> <p>d) No. The HEA regularly collects a range of data from institutions it works with. Students in institutions that take part in StudentSurvey.ie are presented at registration with the HEA data collection notice which explicitly names StudentSurvey.ie (Irish Survey of Student Engagement).</p> <p>e) Retention period</p> <p><i>Demographic data</i></p> <p>The Data Processor is instructed by the HEA to delete the file containing the demographic data fields (which will contain data for students who completed the survey and for those who did not) directly following the completion of data file preparation by the Data Processor and the release of the data files to the institutions. The Data Processor is also instructed by the HEA to delete the pseudonymisation key used to match the student ID with their anonymous alpha-numerical code at this time. This key matches each student's ID number with an alpha-numeric code used by the Data Processor in place of that student ID for anonymisation</p>
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		<p>purposes. Only the Data Processor has access to this key until it is deleted as per the above.</p> <p><i>Survey responses</i></p> <p>The HEA holds the anonymised survey results indefinitely for the purposes of trend analysis and for archiving purposes in the public interest and for statistical purposes.</p>
4.	THE PURPOSE(S) FOR WHICH THE PERSONAL DATA ARE PROCESSED	
4.1	For what purpose(s) are you using the personal data under the Project? How do the purpose(s) relate to the Project's overall purpose?	The Nature and Purpose of Processing is included above.
4.2	Are you processing any of the personal data for a privacy-intrusive purpose?	No.
4.3	Does the Project involve any evaluation or scoring, automated processing, or profiling? ² If so, is this on a 'large scale'?	No. The results are analysed to understand how cohorts of students responded, and to inform enhancement, quality assurance and related activities. The Nature and Purpose of Processing is provided above.

² Profiling is defined under Article 4(4) of the GDPR as: “any form of automated processing of personal data consisting of the use of personal data to evaluate certain personal aspects relating to a natural person, in particular to analyse or predict aspects concerning that natural person's performance at work, economic situation, health, personal preferences, interests, reliability, behaviour, location or movements”. Profiling is composed of three elements: it has to be an automated form of processing; it has to be carried out on personal data; and the objective of the profiling must be to evaluate personal aspects about a natural person. A simple classification of individuals based on their characteristics i.e. age and gender, will not necessarily come within the definition of profiling. What is required is that the characteristics are further processed to identify the present or future behaviour of the individual.

5.	DATA SUBJECTS AND RIGHTS	
5.1	<p>Does the Project:</p> <ul style="list-style-type: none"> a) affect a new group or category of data subjects; b) affect vulnerable data subjects (including children); c) require data subjects to provide personal data where not previously required; d) involve a change to the way in which data subjects may be contacted; e) prevent data subjects from exercising rights (data protection-related or otherwise) accessing a service; f) otherwise affect how data subjects may exercise their rights; g) use personal data in a manner which may not be clear or understandable to data subjects; and/or h) give rise to a security risk to data subjects if there is a data breach? 	<ul style="list-style-type: none"> a) The only people targeted to take part in the survey are students registered in higher education institutions in Ireland. b) The sample may include students aged under 18 as the survey targets first year undergraduate students. They are not required to provide parental consent to participate. c) No. All data are provided by the higher education institution and are data already collected for the Student Record System. d) Students are invited via email from the survey company and are encouraged to participate via social media and other communication from their higher education institution. e) -g) No. The Privacy Statement lists all of the students' rights. h) Yes, due to the presence of the student's name, date of birth, email address and county/ Dublin postcode. <p>This is the agreed process for dealing with a Data Breach:</p> <p>6. DATA BREACH</p>

		<p>6.1 Notify Breach: The Data Processor shall promptly but not later than 24 (twenty-four) hours after becoming aware of it notify the Data Controller and the HEA of any unauthorised access to, or unauthorised use, alteration, disclosure, accidental loss or destruction of, any Data in the custody of the Data Processor (each a “data breach”).</p> <p>6.2 Obligations in Case of Breach: Subject to the cap on liability in clause 5E of the Services Contract and in the event of a data breach caused solely by the Data Processor or named sub-processors, then the Data Processor shall:</p> <ul style="list-style-type: none">(a) take prompt action at its own expense on the instruction of the Data Controller to remedy the cause of the data breach;(b) bear the costs of investigation into said data breach;(c) promptly, at its own expense, provide the Data Controller on request with all information required to fulfil its obligations, as data controller, under Data Protection Laws; and(d) promptly, at its own expense, assist the Data Controller in complying with its obligations under Articles 32 to 36 of the GDPR. <p>1.2. Incident response and business continuity</p> <ul style="list-style-type: none">a. Incidents handling/ Personal data breaches:<ul style="list-style-type: none">i. An incident response plan with detailed procedures is defined to ensure effective and orderly response to incidents pertaining personal data.
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		<p>ii. Processor will report without undue delay to Controller any security incident that has resulted in a loss, misuse or unauthorised acquisition of any personal data.</p> <p>b. Business continuity: Processor establishes the main procedures and controls to be followed in order to ensure the required level of continuity and availability of the IT system processing personal data to the level defined in the SLA (in the event of an incident/personal data breach).</p>
6.	TECHNOLOGIES	
6.1	Does the Project involve new or innovative technology?	No.
6.2	Does the Project involve a novel application of existing technology?	No.
6.3	How do you intend to provide the appropriate notice and choice to data subjects about the use of these technologies?	N/A.
7.	MONITORING/PERSONAL INTRUSION	
7.1	Does the Project involve systematic monitoring, tracking or observation of data subjects or activities in which data subjects are involved, including their location or behaviour (physical or electronic)?	No.
7.2	Does any monitoring include monitoring in public areas?	No.
7.3	Does the project involve any physical intrusion of the person?	No.

8.	USE OF THIRD PARTIES	
8.1	Will the Project involve third parties providing support or processing services?	The survey company (Data Processor) employs a small number of third parties to carry out survey hosting, delivery and distribution, data translation, data cleaning, and to host the survey. The survey company is obliged, via its contract with the HEA, to have substantively similar data protection terms in place with each sub-processor A list of approved sub-processors is provided to the HEA.
8.2	Are any of these third parties new (i.e. parties with whom personal data has not been shared previously)?	No.
9.	OVERSEAS TRANSFERS	
9.1	Do you envisage personal data being transferred to another internal entity or third party in a country outside the EEA? If so, please provide a full list of the countries to which transfer will be made.	Yes. The survey company (Data Processor) is based in the UK. This is acknowledged in the contract with the HEA and in the Data Processing Agreements with the individual Higher Education Institutions. Standard Contractual Clauses have been agreed, which will be appended to the Data Processing Agreements in the event an equivalency agreement is not made between the EU and UK by the end of the interim period post Brexit. These SCCs will be updated as necessary in accordance with any recommendations, guidances or replacement clauses issued by the European Commission between the date hereof and the implementation of the SCCs as between the parties (and shall be amended as necessary to account for such recommendations, guidances or replacement clauses following implementation).

10.	REMAINING ODPC PROCESSING OPERATIONS REQUIRING A DPIA	
10.1	<p>Will the Project specifically involve any of the following (please indicate ‘yes’ or ‘no’ for each):</p> <ul style="list-style-type: none"> a) profiling vulnerable persons, including children, to target marketing or online services at such persons; b) use of profiling or algorithmic means or special category data as an element to determine access to services or that results in legal or similarly significant effects; c) processing biometric data to uniquely identify data subject(s) or enable or allow the identification or authentication of data subject(s) in combination with any of the other criteria set out in WP29 DPIA Guidelines³; d) processing genetic data in combination with any of the other criteria set out in WP29 DPIA Guidelines. e) indirectly sourcing personal data where GDPR transparency requirements are not being met, including when relying on exemptions based on impossibility or disproportionate effort; f) combining, linking or cross-referencing separate datasets where such linking significantly contributes to or is used for profiling or 	<ul style="list-style-type: none"> a) No. b) No. c) No. d) No. e) No. f) No. g) Yes. 1. processing for archiving purposes in the public interest, scientific or historical research purposes or statistical purposes; <p>Anonymised datasets are archived indefinitely with the Irish Social Sciences Data Archive (ISSDA) and pseudonymised datasets are held by the participating higher education institutions indefinitely.</p>

³ See Appendix 1 for an account of the WP29 criteria. If further clarification on these criteria is required, please ask.

	<p>behavioural analysis of data subject(s), particularly where the data sets are combined from different sources where processing was/is carried out for different purposes or by different controllers; or</p> <p>g) large scale processing of personal data where the Data Protection Act 2018 requires “<i>suitable and specific measures</i>” to be taken in order to safeguard the fundamental rights and freedoms of individuals⁴.</p>	
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⁴ See Appendix 2 for list of circumstances specified under the Data Protection Act 2018 requiring such “suitable and specific measures”.

Appendix 1.2 Wp29 Criteria

1. Evaluation or scoring, including profiling and predicting, especially from “*aspects concerning the data subject's performance at work, economic situation, health, personal preferences or interests, reliability or behaviour, location or movements*”.
2. Automated-decision making with legal or similar significant effect.
3. Systematic monitoring.
4. Sensitive/highly personal data (including special categories of personal data and personal data relating to criminal convictions or offences).
5. Data processed on a large scale: in determining if processing is carried out on a large scale, WP29 recommends the following be considered:
 - (a) the number of data subjects concerned, either as a specific number or as a proportion of the relevant population;
 - (b) the volume of data and/or the range of different data items being processed;
 - (c) the duration, or permanence, of the data processing activity;
 - (d) the geographical extent of the processing activity.
6. Matching or combining datasets, for example originating from two or more data processing operations performed for different purposes and/or by different data controllers in a way that would exceed the reasonable expectations of the data subject.
7. Data concerning vulnerable data subjects.
8. Innovative use or applying new technological or organisational solutions, e.g. combining finger print and face recognition for improved physical access control.

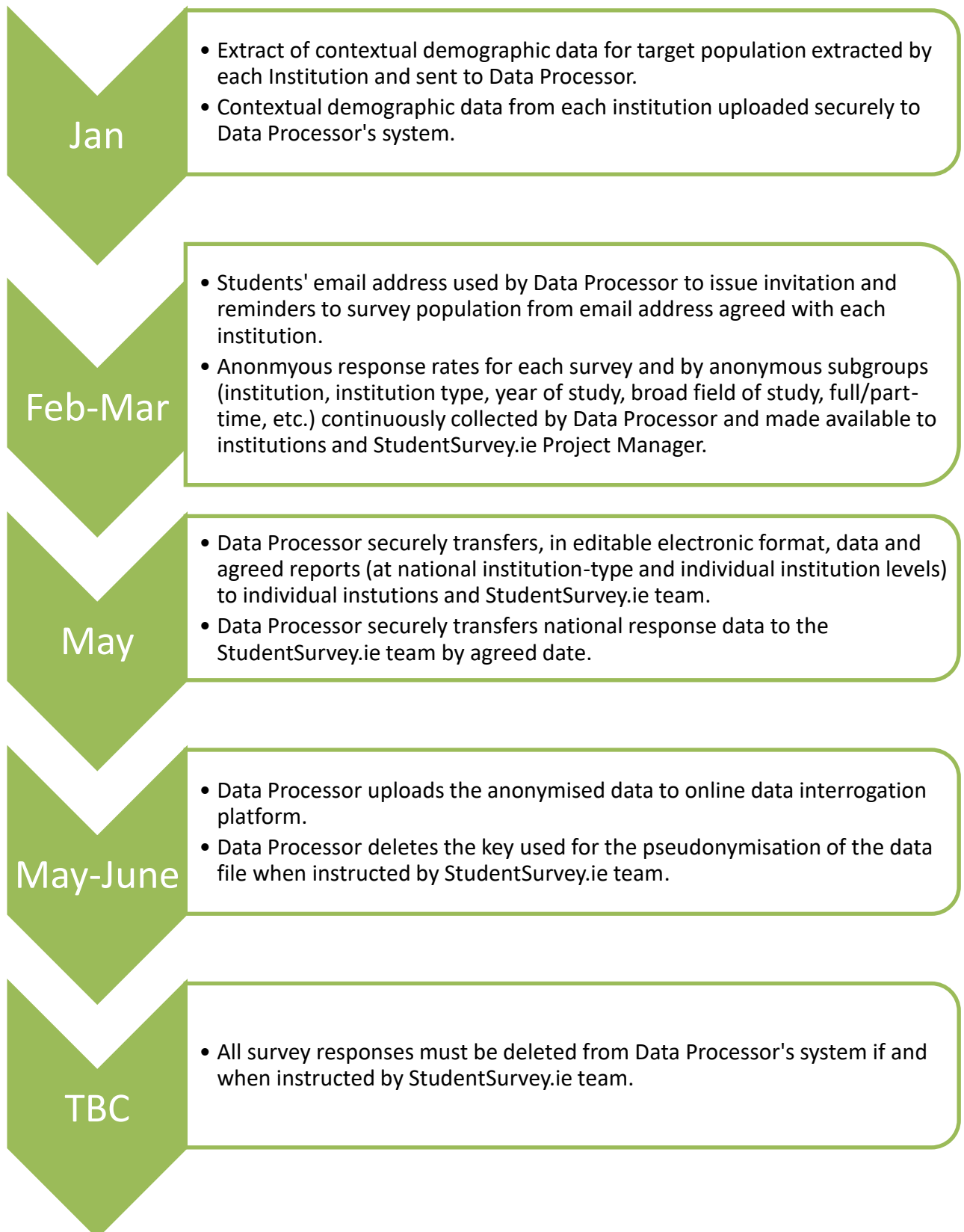
9. When the processing in itself “*prevents data subjects from exercising a right or using a service or a contract*” (e.g. processing operations which aim at allowing, modifying or refusing data subjects’ access to a service or entry into a contract, such as a bank loan).

Appendix 1.3 Data Protection Act 2018

Processing activities subject to “suitable and specific measures” to safeguard the fundamental rights and freedoms of data subjects include:

1. processing for archiving purposes in the public interest, scientific or historical research purposes or statistical purposes;
2. processing for the purposes of exercising or performing any right or obligation which is conferred or imposed by law on the controller or the data subject in connection with employment or social welfare law;
3. processing in the course of electoral activities in the State for the purpose of compiling data on peoples’ political opinions by a political party or a candidate for election to, or holder of, elective political office in the State
4. processing for the administration of justice or the performance of a function conferred on a person by or under an enactment or the Constitution;
5. processing health data for the purposes of a policy of insurance or life assurance, a policy of health insurance or health-related insurance, an occupational pension, a retirement annuity contract or any other pension arrangement or the mortgaging of a property; and/or
6. processing of personal data relating to criminal convictions and offence in certain circumstances.

Appendix 1.4 StudentSurvey.ie data flow diagram



APPENDIX 2

SUPPLEMENTARY ASSESSMENT QUESTIONNAIRE

This SAQ is the second main stage in the DPIA process and outcome. Unlike the Preliminary Assessment Questionnaire (PAQ), which was, primarily, a standard document intended to identify the need to complete a DPIA (whether as a legal requirement or otherwise), this SAQ has been prepared as a document bespoke to StudentSurvey.ie (“**StudentSurvey.ie**”) and to the Project. It is intended to expand upon this information to provide us with a more comprehensive understanding of the Project (as defined in the PAQ), including: the personal data being processed; the processes involved; the purpose of the Project and the personal data processing involved in the Project, etc. Terms used herein and defined in the PAQ shall have the meaning given to them in the PAQ.

Although on a review of the responses provided by StudentSurvey.ie to the PAQ dated 19 April 2021 it is evident that any processing of personal data by StudentSurvey.ie as part of the Project is minimal, meaning that a full DPIA for such processing is likely not required, it is considered prudent to further examine StudentSurvey.ie’s processing activities as part of the Project to ensure obligations on StudentSurvey.ie are being met. Thus, this SAQ, when combined with the PAQ, forms the substance of StudentSurvey.ie’s assessment of its processing activities as part of the Project and represents the Project DPIA. It should be used and retained by StudentSurvey.ie as a record of its compliance with requirements on it under the GDPR (specifically Article 35) to identify any risks arising out of the processing of personal data and to minimise these risks.

NO.	QUESTION	ANSWER
11.	SYSTEMATIC DESCRIPTION OF PROCESSING OPERATIONS	
1	More detailed description of certain aspects of the Project:	
	a) Please describe the nature of the relationship between the HEA and StudentSurvey.ie. What is the	StudentSurvey.ie is co-sponsored by the Higher Education Authority (HEA), Irish Universities Association (IUA), Technological Universities Association and Aontas na Mac Léinn in Éirinn (AMLÉ).

	<p>legal status of StudentSurvey.ie? How is the HEA a separate entity, if at all?</p>	<p>A single technical survey contractor conducts StudentSurvey.ie on behalf of the co-sponsoring organisations. In 2024 the administration of StudentSurvey.ie was transferred from THEA to the HEA.</p>
	<p>b) What controls are in place to ensure that any information to which the HEA may have access, including personal data on students collected by the HEA from institutions with which it works, is not accessible by StudentSurvey.ie (which may allow for otherwise anonymised data received by StudentSurvey.ie from the Data Processor to be combined with that other information/personal data and become personal data)?</p>	<p>The StudentSurvey.ie does not have access to any HEA databases. Only publicly accessible data and published reports are accessible by the StudentSurvey.ie management, with no possibility for combination with the anonymised StudentSurvey.ie results.</p>
	<p>c) Is there any other information to which StudentSurvey.ie would have access that would enable it (including any member of its personnel) to identify particular students from the information it receives from the Data Processor such that the information would become personal data?</p>	<p>If the results supplied by the Data Processor to StudentSurvey.ie retained the student number this would enable an individual student to be identified. However, no member of StudentSurvey.ie has access to any databases containing student numbers with matching student names, therefore even with this information there would be no opportunity to use it to unlock any further information.</p>
	<p>d) What processes does StudentSurvey.ie have in place to prevent receipt of unrequested/unwanted datasets containing personal data from higher education institutions?</p>	<p>Every year the Data Processor circulates a Fieldwork Handbook to the relevant staff in all participating institutions which clearly outlines the data required from the student records system and how to upload those data securely (via a platform called In Touch). This process is also outlined in the Data Processing Agreement between each individual institution and the Data Processor. Finally, the</p>

	<p>StudentSurvey.ie Team makes clear in their communication to institutions that data submissions are to be made securely via In Touch and are not to be sent to them. StudentSurvey.ie has access to some aspects In Touch, such as the data analytics dashboard, but every user has an individual account with individual permissions, and so StudentSurvey.ie cannot access what is uploaded by institutions.</p>
<p>e) What due diligence, if any, was carried out in selecting a survey company to act as Data Processor?</p>	<p>The survey company to act as Data Processor is selected via a Europe-wide procurement process using e-tenders. A StudentSurvey.ie Technical Group reviews all submissions via this tendering process and selects a winner based on a pre-determined scoring system. The current survey won the competition in 2014, 2017 and 2020, and their contract is due to expire in October 2026.</p>
<p>f) What ongoing audit work, reviews, etc., if any, are carried out by StudentSurvey.ie and/or the HEA into the activities of the Data Processor, including its processing activities?</p>	<p>StudentSurvey.ie sought a DPIA from the survey company in 2020, which was delivered. The StudentSurvey.ie Team is in constant contact with the Data Processor during the survey fieldwork preparation, fieldwork, and results preparation. The Data Processor has been explicitly instructed to keep the StudentSurvey.ie Team informed of any and all issues, and to the best of our knowledge that is happening.</p>
<p>g) How do institutions send background personal data on students to the Data Processor for the purposes of the Project? Please describe the mechanisms used and the security measures in place.</p>	<p>Institutions select a member of staff to access the In Touch platform, which they use to upload the data securely to the Data Processor's system.</p> <p>From Data Processor:</p> <p><i>“Student demographic and contextual data, including preferred email address, will be securely transferred via our In Touch web portal. Data transfer will be fully compliant with the GDPR and the UK Data</i></p>

		<p><i>Protection Act 2018. All data is transferred over Secure Sockets Layer (SSL) and stored in encrypted databases. SSL is a networking protocol designed for securing connections between web clients and web services over an insecure network, such as the internet. Aside from the trust benefits of SSL, it ensures that all data is encrypted during transit between our server and the recipients browser. Access to our databases is regularly reviewed to ensure that only those who need access, have access.</i></p> <p><i>[Data Processor] has appropriate policies in place regarding the sending of data and provides secure methods of doing so. Email is considered insecure and must not be used to share confidential files or sensitive information under any circumstances. We will use the new file store embedded within our In Touch web portal to securely transfer contextual demographic data and report files. As a contingency, we can securely share files via SecureSend; data transfer via SecureSend uses 256 bit AES encryption and a 2048 bit SSL certificate.</i></p> <p><i>All team members are informed and trained on the data protection and data transfer policies and procedures as and when they join the team, and regular refresher training is undertaken.”</i></p>
	<p>h) What access, if any, would StudentSurvey.ie have to communications of personal data between individual institutions and the Data Processor?</p>	<p>None. All technical support for this activity is provided by the Data Processor support managers.</p>
	<p>i) Has the Data Processor provided StudentSurvey.ie with any information on how the results data is anonymised from a technical perspective?</p>	<p>The following is an extract from the DPIA carried out by the Data Processor in 2020:</p>

		<p><i>“Risk: Survey results data is downloaded from Confirmit and held in SQL on Tribal servers.</i></p> <p><i>Solution(s): All personal contact information is removed. anonymised data is processed and analysed.</i></p> <p><i>Result: Risk Reduced</i></p> <p><i>Evaluation: All personal identifiers are removed from the data as early in the process as possible.”</i></p> <p>The Data Processor has student name as one field, and this is deleted before the results are released to anyone. They have a field for student email address in order to contact students to invite them to take the survey, and this is deleted before the results are released to anyone. Finally, they have a field for student date of birth, and this is replaced with student year of birth, and the rest of the date of birth is deleted before the results are released to anyone. The free text responses are cleaned by a specialised company named in the DPA to ensure they include no student names or names of individuals.</p>
	<p>j) If higher education institutions share background data with the Data Processor directly (i.e. not through the HEA), why does the HEA’s data collection notice refer to the sharing by it of data on students with the Data Processor?</p>	<p>When StudentSurvey.ie was first established it was included in the data collection notice for the HEA, as this data collection notice provides the basis for the data collection notice for all institutions affiliated with the HEA. The HEA, due to taking a more active role in the administration of Student Survey in 2024, is now considered a joint data controller over this data. The HEA does not receive or directly process personal data as stated above, however due to their leadership role, they jointly determine the purposes and the means of</p>

	the processing of the data, and without the HEA’s involvement, the survey would no longer occur.					
1 Please fill out the data lifecycle table below:						
Step	General data collected/processed (including ongoing)	Persons with access to data (general)	Personal Data directly collected/processed	Personal Data indirectly collected/processed⁵	Personal Data Processed by StudentSurvey.ie	
Background personal data provided by participating higher education institutions to Data Processor	<p>No data (whether personal data or otherwise) collected or processed by StudentSurvey.ie.</p> <p>This is because institutions provide background data to the Data Processor directly via the In Touch platform.</p> <p>Data provided by institutions is as set out in section 1.1 of PAQ.</p>	<p>Participating higher education institutions</p> <p>Data processor</p>	Personal data as set out in Section 1.1 of PAQ (by participating higher education institutions and Data Processor only)	None	None	

⁵ Personal Data may be **indirectly** processed if the data collected may become Personal Data through combination with other datasets available to the controller. In the case of the Project, this may include, for example, CCTV.

	Students invited to take part in survey by Data Processor on behalf of each institution	<p>No data (whether personal data or otherwise) collected or processed by StudentSurvey.ie.</p> <p>This is because Data Processor contacts students directly, via the students' email addresses.</p>	Data Processor	Email addresses of students (by Data Processor)	None	None
	Survey responses are collected	<p>No data (whether personal data or otherwise) collected or processed by StudentSurvey.ie.</p> <p>This is because students provide responses directly to Data Processor.</p> <p>Survey responses continue to be linked to each student, and responses may themselves contain personal data.</p>	Data Processor	Personal data as set out in Section 1.1 of PAQ and contents of survey responses themselves (by Data Processor only)	None	None

	Data Processor removes identifiable data from responses and sends resultant data to StudentSurvey.ie for quality assurance purposes	StudentSurvey.ie receives anonymised data from the Data Processor (i.e. the data provided to the Data Processor above, as well as the survey responses, have been stripped of identifiers).	Data Processor StudentSurvey.ie	Once data has been anonymised, none.	None	None
	Data Processor provides secure access to each institution separately to the responses from survey respondents enrolled in that institution	Participating higher education institutions each receive access to anonymised data from the Data Processor (i.e. the data provided to the Data Processor above, as well as the survey responses, have been stripped of identifiers). This will be substantially the same as the data provided to StudentSurvey.ie	Participating higher education institutions Data Processor StudentSurvey.ie	None	None	None

		above, and continues to be anonymised.				
	<p>In respect of any Personal Data identified at columns 4, 5 and/or 6 of section 1.2 above, please describe the scope of the processing:</p> <p>a) What is the nature of the data, and does it include special category data?</p> <p>b) How much data will be collected and used?</p> <p>c) How often?</p> <p>d) How long will it be kept?</p> <p>e) How many individuals are affected?</p> <p>f) What geographical area does it cover?</p>		<p>As identified above, StudentSurvey.ie does not have any access to personal data at any stage of the data lifecycle.</p>			
1	<p>Please respond to the specific questions below:</p>					
1	<p>a) Please provide a sample of the information received by StudentSurvey.ie from the Data Processor.</p>		<p>Sample results files are attached to my email reply.</p>			

<p>b) Otherwise than as identified at column 5 of section 1.2 above, could any of the Project data be combined with other information to identify students by StudentSurvey.ie?</p>	<p>No</p>
<p>c) What data (not just personal data), if any, is retained by StudentSurvey.ie at the conclusion of the survey process in a particular year? It is noted from the PAQ that the anonymised results that are sent to StudentSurvey.ie are retained indefinitely – are these data retained in the form in which they were received or are amendments made?</p>	<p>The results in the form they are received from the survey company are retained indefinitely.</p> <p>The StudentSurvey.ie results (not PGR StudentSurvey.ie at present) are also submitted to the Irish Social Sciences Data Archive for indefinite archiving, but institution name and course code are removed in order for results to be anonymised for student and institution.</p>
<p>d) Where is the Project data hosted/stored? Please include all areas it may be stored, including backups, copies, etc.</p>	<p>For the survey company – on their servers in the UK</p> <p>For StudentSurvey.ie management – locally on the Team’s HEA drive.</p>
<p>e) <i>Sharing of the Project data:</i> Is any Project data, whether personal data or otherwise, ever shared with third parties (including any sub-processors identified above)? Please describe how and why such data may be shared.</p>	<p>By the survey company – with specific third party processors for the purpose of hosting the survey, cleaning the data and translating the free text responses in Irish.</p> <p>By StudentSurvey.ie management – analysis of the data by third parties is encouraged by the StudentSurvey.ie Steering Group. Any application for access to anonymised data must be considered by the StudentSurvey.ie Steering Group upon receipt of a written submission outlining the proposed uses of the data and signed confidentiality agreement. As noted, the data are archived with ISSDA. Finally, occasionally the StudentSurvey.ie management funds bursaries to encourage analysis of specific datasets. To date this has only been for the analysis of qualitative</p>

		data. In this instance, the funded project leaders sign contracts and confidentiality agreements in advance of receiving anonymised data.
	f) <i>Destruction/Deletion of the Project images:</i> Please confirm the process by which data captured by the Data Processor as part of the Project are deleted.	The key matching student number with alpha-numeric code is deleted by the Data Processor upon instruction from the StudentSurvey.ie Team, usually three weeks after the delivery of the results to participating institutions. The Data Processor then confirms deletion. The personal data provided by institutions is deleted as part of the standard operating protocol in mid-June.
12.	PURPOSE(S) OF THE PROCESSING	
1	<p>In a general sense, please describe the purposes of the processing as part of the Project:</p> <p>a) In summary, what do the stakeholders wish to achieve from the Project?</p> <p>b) What is the intended effect for students?</p> <p>c) What are the benefits of the processing – for higher education institutions, the HEA, StudentSurvey.ie and more broadly?</p>	<p>a) The main reason for the surveys is to provide benefits to each institution and its students by helping to improve feedback and appropriate follow up action. Objectives identified for the surveys include:</p> <ul style="list-style-type: none"> • To increase transparency in relation to the student experience of and engagement with higher education; • To enable direct student input in expressing their experience and engagement with their higher education institution; • To ensure that the student voice is heard and acknowledged, with an ongoing partnership to ensure impact from the survey findings, between individual higher education institutions and students’ unions; • To facilitate higher education institutions’ efforts to reflect that engagement and those experiences in their policy and practice in an impactful way; • To help institutions identify areas of strength in how students engage, so they can continue and strengthen these practices; • To help institutions identify areas requiring further development or improvement in how students engage so they can respond; • To serve as a guide for continual enhancement of institutions’

		<p>teaching and learning and student engagement;</p> <ul style="list-style-type: none"> • To facilitate comparison with other higher education systems nationally, sectorally and internationally. <p>b) For StudentSurvey.ie, achieving impact is understood to mean identifying the value which has been added, and continues to be added, to the student experience by the data collection, analysis and the subsequent integration of results into policy and practice. In other words, what real positive impacts has the survey had over its duration to date in terms of highlighting indicative areas which appear to be working well, areas for improvement and areas for further development. And in having this focus, what unexpected impacts have also taken place which have required or benefited from a strategic or procedural review and change.</p> <p>c) The StudentSurvey.ie initiative originated in 2012 as a response to The National Strategy for Higher Education to 2030. The Strategy included recommendations relating to the development and implementation of a national survey of students. The Strategy stated that, “Students have a major contribution to make in influencing the design of curricula, and in reviewing and providing feedback on them. All higher education institutions should have formal structures to ensure that students are involved in curriculum design and revision” and recommended that, “every higher education institution should put in place a comprehensive anonymous student feedback system, coupled with structures to ensure that action is taken promptly in response to student concerns”. The National Strategy continued to state, “Student representatives should be involved in the process for acting on student feedback, and this process should be transparent and accessible to all students. In addition, a</p>
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		<p>national student survey system should be put in place and the results published.” More recently, the HEA Act 2022 (Section 45) provides a legislative basis for undertaking surveys of student engagement. 45. (1) An tÚdarás shall undertake, or cause to be undertaken, in co-operation with representatives of students, national representatives of designated institutions of higher education, designated institutions of higher education and the Qualifications and Quality Assurance Authority of Ireland surveys of students which shall— (a) be undertaken at regular intervals and, in any event, not less frequently than once every 2 years, (b) be undertaken in respect of undergraduate students and postgraduate students, (c) collect information for the purpose of documenting student engagement in higher education identifying good practice and any challenges arising, (d) collect information for the purpose of enhancing student engagement, teaching, learning and assessment at a local level and a national level, (e) collect information on student opinion on important issues of higher education practice and policy at a local level and a national level, and (f) collect information on such other matters as may be agreed from time to time by An tÚdarás, representatives of students, national representatives of designated institutions of higher education and the Qualifications and Quality Assurance Authority of Ireland, following consultation with the Minister.</p> <p>The US National Survey of Student Engagement (NSSE) was identified as an appropriate initial reference point for an Irish national survey. At the time, NSSE operated in the US and Canada with derivative surveys in use in multiple other countries, including the UK. Given this methodological coherence, a national pilot survey was implemented in 2013 for first year undergraduates, final year undergraduates and postgraduate students on taught programmes. The pilot has been followed by national surveys annually thereafter. In 2018, a national pilot survey for postgraduate</p>
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research students was developed and implemented as an additional element of the overall StudentSurvey.ie initiative. This reflects an early commitment to include the experiences of these students in the development of national student survey(s), given that pre-testing of the original question set used to develop the 2013 pilot identified the need for specific questions to reflect the experiences of research students. In 2022, the survey entered a period of Strategic Reflection and Review. The review process aimed to deepen understanding of student engagement within the context of a rapidly evolving higher education landscape. To achieve this, current trends were examined, challenges, and opportunities, leading to the commissioning of two reports—the Mi:Lab report and the Crowe report—to provide actionable insights and inform the redesign of StudentSurvey.ie. The Mi:Lab report examined the day-to-day operations of the survey within institutions, identifying key challenges faced during implementation. The Crowe report engaged senior management and recognized StudentSurvey.ie as a well-established tool for capturing the student experience in teaching and learning within the Irish higher education sector. However, it also highlighted challenges related to the survey instrument, governance, strategic objectives, and the impact of survey outcomes. Informed by these reports and extensive feedback from stakeholders, the Steering Group decided to postpone fieldwork in 2024, opting instead to conduct a comprehensive review of the survey instrument. This review sought to reaffirm the pivotal role of the student voice in enhancing higher education experiences. A revised taught survey was put in place for 2026, following an 18-month review process carried out by a StudentSurvey.ie Review Working Group.

The StudentSurvey.ie position

Goal 1: Going beyond the operational to the transformative.

Goal 2: Enabling the optimum conditions for the student should be at the centre of what an institution does and how they move forward. What does impact mean for the results of StudentSurvey.ie? Fundamentally, it means using the student feedback to bring about desirable, enduring and positive changes which will further enhance learning and the whole student experience, involving the students in the decision-making at all points.

Some core actions are the following:

1. Analysing the data to gather information from students' views,
2. Translating these outcomes into feedback,
3. Actively listening,
4. Corroborating data with further capturing of evidence where appropriate,
5. Taking action to address what the students have relayed and reflected back, across the spectrum of continuing what is working well, and adapting or discontinuing what is not,
6. Using subsequent monitoring to capture and evaluate if the action had the expected or desired effect and has provided a new/ re-directed and old pathway to ongoing long-term improvement and transformation.

StudentSurvey.ie represents a rich and ever-growing source of a rich purposeful range of student-generated data. The challenge is to have channels through which to share this, reflect on it in relation to strategic objectives and policy-making, and consequently take actions to enable the data to have ongoing impact. In using learner data as the catalyst for development and improvement, as well as for identifying risks and threats, the institution can take an approach to impact identification, evaluation and cultivation which will mean the learner is firmly situated

		<p>at the centre of decision-making, and that their experiences and feedback drive the development of the institution.</p>
1	<p>Please list all purposes underpinning the Project (e.g. student engagement, improving the student experience, identifying shortcomings in current institution practices, etc.) in order of priority.</p>	<p>The StudentSurvey.ie initiative is underpinned by a number of key principles which include:</p> <ul style="list-style-type: none"> • The explicit aspiration to support and inform enhancement of the experiences of students; • Meaningful benefits at institutional level to staff and to students; • Transparency of implementation whilst guaranteeing student confidentiality; • Minimisation of any additional workload at institutional level and, thereby, to facilitate increased focus on promotion of participation and interpretation of resulting data; • Effective communication of the overall initiative via the StudentSurvey.ie Team, noting that there are also complementary bilateral interactions between individual institutions and the survey contractor; • Alignment with the higher education System Performance Framework; <p>The overall objectives of StudentSurvey.ie are identified as:</p> <ul style="list-style-type: none"> • To increase transparency in relation to the student experience of and engagement with higher education; • To enable direct student input in expressing their experience and engagement with their higher education institution; • To ensure that the student voice is heard and acknowledged, with an ongoing partnership to ensure impact from the survey findings, between individual higher education institutions and students' unions; • To facilitate higher education institutions' efforts to reflect that engagement and those experiences in their policy and practice in an impactful way; • To help institutions identify areas of strength in how students engage, so they can continue and strengthen these practices; • To help institutions identify areas requiring further development or improvement in how students engage so they can respond; • To serve as a guide for continual enhancement of institutions' teaching and learning and student engagement; • To facilitate

		<p>comparison with other higher education systems nationally, sectorally and internationally.</p> <p>There is no order of priority of these objectives.</p>
13.	LEGAL BASIS FOR PROCESSING	
1	<p>For information purposes only, please identify, if known, the legal basis relied upon by higher education institutions in sharing student personal data with the Data Processor as part of the Project.</p>	<p>The lawful bases for the sharing of these data is as follows:</p> <p>Article 6(1)(e) of the GDPR allows for the processing of Personal Data where this is necessary for the performance of a task carried out in the public interest. It is anticipated that the proposed methodology for analysis of responses to StudentSurvey.ie will lead to an enhanced student experience in the institutions which participate in the survey.</p> <p>Part of the Agreed Purposes for the sharing of Personal Data is to prepare statistics. For such processing, the Data Controller will also rely on Article 89 of the GDPR which permits the processing of Personal Data for purposes outside that for which the data were collected where the processing is for statistical purposes.</p>
14.	FURTHER ASSESSMENT OF NECESSITY AND PROPORTIONALITY	
1	<p>Please describe, in list form, all measures proposed to prevent the processing of personal data collected as part of the Project by StudentSurvey.ie (i.e. to prevent receipt of student personal data by either higher education institutions, the Data Processor or otherwise during the course of the Project).</p>	<p>The survey contractor offer two methods to transfer data securely from institution to their platform and institutions are continuously reminded of this in communication with the survey contractor and the Team: through the In Touch secure platform or using a secure file sender platform.</p> <p>The Fieldwork Handbook emphasises the need to use these secure methods and explains how to use them.</p>

		Where institutions do use alternative methods, they are quickly and clearly informed of their error and directed to transfer the data securely. Any unsecure data transferred are immediately deleted.
1	Further to 4.1 above, are any additional limiting measures possible? If so, why are such measures not being implemented?	None that the StudentSurvey.ie Steering Group is aware of.
1	Please describe, in list form, all measures proposed to limit any potential adverse impact of the Project on students.	<p>Respondents are asked not to include their name or other identifying information in their responses, and where they do this informed is removed by the survey contractor during data cleaning.</p> <p>The questions do not deal with any sensitive topics.</p> <p>Participation is voluntary.</p> <p>Respondents may stop participating at any time.</p> <p>The survey is kept as short as possible to reduce the burden on respondents' time.</p> <p>The survey is written in plain English and any changes are field tested before being introduced.</p>
1	Is the Personal Data processed by the Project adequate, relevant and limited to what is necessary in relation to the identified purposes?	Yes.
1	How will the parties vindicate the rights of students (e.g. transparency, rights of access, erasure, etc.) in relation to the Project? To what extent does this responsibility lie with the HEA and/or StudentSurvey.ie?	StudentSurvey.ie values students' privacy and recognises the need to process personal data in a fair and lawful manner in accordance with the legal rules laid out in the General Data Protection Regulation (GDPR) and the Irish Data Protection Act 2018. Student confidentiality is a central principle of StudentSurvey.ie.

A Privacy Statement provides students with information about the personal data collected and how that personal data is processed.

The project management commits not to use students' data to:

- identify any one individual student or small group of students
- be used for marketing
- be sold
- be passed on to any third party without the consent of the StudentSurvey.ie Steering Group.

Students are reminded of their rights in the Privacy Statement and before taking the survey:

- Your rights as regards the personal data we hold on you depends on the applicable laws in your country of residence.
- If you reside in the European Economic Area (“EEA”), you have the right to request that we:
- provide you with information as to whether we process your data and details relating to our processing, and with a copy of your data;
- rectify any inaccurate data we might have about your without undue delay;
- complete any incomplete information about you;

		<ul style="list-style-type: none"> • under certain circumstances, erase your personal data without undue delay; • under certain circumstances, be restricted from processing your data; and • under certain circumstances, furnish you with the personal data which you provided us within a structured, commonly used and machine readable format. • Where we process your personal data solely on the basis of your consent you have the right to withdraw consent in respect of processing personal data. After taking the survey, if you want to withdraw your consent you must contact the survey company at info@studentsurvey.ie by the 1st of May of the same year you undertake the survey. • You also have the right to lodge a complaint with your data protection supervisory authority. • The exercise of the above rights might be subject to certain conditions and we might require further information from you before we can respond to your request. 		
15.	IDENTIFY AND ASSESS RISKS			
1	Describe source of risk and nature of potential impact on students (include associated compliance and corporate risks as necessary)	Likelihood of harm (remote, possible or probable)	Severity of harm (minimal, significant or severe)	Overall risk (low, medium or high)

1	Student personal data inadvertently shared with StudentSurvey.ie by higher education institutions	Possible	Minimal	Medium
1	Student personal data inadvertently shared with StudentSurvey.ie by Data Processor	Remote	Significant	Medium
1	Pseudonymisation key shared by Data Processor with StudentSurvey.ie	Remote	Significant	Medium

Excerpt from Risk Register:

#	Category	Risks	Description	Possible causes	Status	Mitigation	Owner
11	Data Protection	Breach of student anonymity	Respondent anonymity is guaranteed to students and several protections are in place to ensure this, both in terms of the Terms of Engagement institutions and stakeholders are required to agree with and the technical mechanisms in place for data sharing and collection.	A breach of student anonymity could occur if an institution combined low-frequency student characteristics to identify a respondent	Open	Those with access to the results are frequently reminded of the project's commitment to student anonymity. Access to the data is given based on instruction from the Registrar/ nominated deputy of the Registrar through a secure platform. Respondents are asked not to include their name or other identifying information in their responses, and where they do this informed is removed by ETIO during data cleaning.	HEA Survey Team Participating institutions

16.	IDENTIFY MEASURES TO REDUCE RISK						
16	Identify additional measures you could take to reduce or eliminate risks identified as medium or high risk in section 5:						

16	Risk	Options to reduce or eliminate risk	Effect on risk (eliminated, reduced or accepted)	Residual risk (low, medium or high)	Measure approved (yes/no)
16	Student personal data inadvertently shared with StudentSurvey.ie by higher education institutions	The Data Processor offers two methods to transfer data securely from institution to their platform and institutions are continuously reminded of this in communication with the Data Processor and the Team. The Fieldwork Handbook emphasises the need to use these secure methods and explains how to use them. Where institutions do use alternative methods, they are quickly and clearly informed of their error and directed to transfer the data securely. Any unsecure data transferred are immediately deleted.	Reduced	Medium	Yes
16	Student personal data inadvertently shared with StudentSurvey.ie by Data Processor	All protocols instruct that this is not to be done. Quality assurance measures are in place for data uploaded to In Touch for release to Team.	Reduced	Low	Yes
16	Pseudonymisation key shared by Data Processor with StudentSurvey.ie	All protocols instruct that this is not to be done. Quality assurance measures are in place for data uploaded to In Touch for release to Team.	Reduced	Low	Yes

17.	OTHER DATA PROTECTION CONSIDERATIONS		
17	<p>Fair Processing: Please describe in detail how students are informed regarding the Project, including: purposes of the Project; use of the system; data to be collected; rights of employees; Article 13 requirements, etc.</p>	<p>The website contains a Blog post where all relevant information about data processing and protection is presented, and it is re-shared on social media during fieldwork: https://studentsurvey.ie/blog/are-my-answers-really-anonymous</p> <p>The Privacy Statement is permanently available on the website: https://studentsurvey.ie/privacy-statement</p> <p>Students must indicate they have read the Privacy Statement before taking the survey.</p> <p>StudentSurvey.ie is highlighted in the HEA and individual institutional data use notice at registration every year.</p>	
17	<p>Data Retention: Please set out the retention periods for Personal Data collected under the Project, including how Personal Data is identified as no longer being necessary.</p>	<p>Anonymised datasets are stored indefinitely for time series research.</p>	
18.	MISCELLANEOUS		
18	Item	Name/date	Notes
18	Measures approved by:		Integrate actions back into project plan, with date and responsibility for completion

18	Residual risks approved by:		If accepting any residual high risk consult the Data Protection Commission before going ahead
18	DPO advice provided:		DPO should advise on compliance Step 6 measures and whether processing can proceed
18	Summary of DPO advice:		
18	DPO advice accepted or overruled by:		If overruled you must explain your reasons
18	Comments:		
18	Consultation responses reviewed by:		If your decision departs from individuals' views you must explain your reasons
18	Comments:		
18	This DPIA will be kept under review by:		The DPO should also review ongoing compliance with DPIA