



## **Policy on Confidentiality of Individual-Level Data Collected by Bryn Mawr College's Office of Institutional Research**

### **Rationale for Confidentiality Policy**

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The operations of the Office of Institutional Research frequently require the collection of survey responses from individual members of the campus, including faculty, students, and staff.

To comply with federal and institutional regulations pertaining to the protection of the confidentiality of data collected from human subjects, this confidentiality policy was designed to meet two important goals of Bryn Mawr's Office of Institutional Research with regard to such data collection efforts.

- A. To protect the confidentiality of all personal information provided to the Office in the context of data collection and analysis for institutional research purposes.
- B. To store such information in a manner that will enable the Office to link or merge such responses at the individual level with other sources of institutional data for the purposes of institutional research. These data will be stored for as long as they remain relevant to current strategic planning issues at the college.

### **Measures to Ensure Confidentiality of Individual-Level Survey Responses**

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- 1. The database(s) containing the survey responses will be maintained on a network drive that is password-protected within the Office of Institutional Research.
- 2. Individual respondents will not be identified in any presentations of survey results.
- 3. Summary results will not be reported in any presentations of survey results for groups smaller than five individuals.
- 4. Under no circumstances will identifiable survey responses be made available to anyone outside of the Office of Institutional Research (including senior executives of the College, as well as the President).

## Consortial Surveys

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Bryn Mawr belongs to the COFHE consortium of colleges, to the HEDS consortium of colleges, as well as other data-sharing consortia. These consortia occasionally conduct surveys of individuals, in which Bryn Mawr participates. Some of these surveys optionally request identifying information of respondents.

The Consortium staff typically process the survey responses, including the fields uniquely identifying respondents. However, these personnel adhere to a strict policy on confidentiality.

Within the Office of Institutional Research, handling of datasets associated with any such surveys will adhere to all the policies described above for Bryn Mawr-specific surveys.

## Participation in Third-Party Surveys

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Bryn Mawr occasionally receives requests to assist third parties in their efforts to survey campus constituencies (students, faculty, or staff). In most cases, the college does not control the content of these survey efforts or the manner in which collected data are managed, presented, and used, which complicates obtaining informed consent from participants. Moreover, these efforts typically do not directly support institutional improvement. As such, they are not exempt from institutional review board (IRB) procedures for human subjects research.

In some cases, campus constituencies are contacted directly by third parties without Bryn Mawr's knowledge. Where college consent or involvement is requested, however, such research efforts must first be reviewed and approved by Bryn Mawr's Office of Institutional Research. If the Office of Institutional Research decides that the project merits Bryn Mawr's participation, then the third party will submit the project to Bryn Mawr's Institutional Review Board, which must also approve it before institutional consent is granted.

This requirement applies to passive institutional consent without any formal role in implementing the data collection effort, as well as to more active forms of participation, including: mass emailing or phone messaging survey invitations; providing lists of emails or telephone numbers of campus constituencies; hosting the survey online or collecting data using paper forms; participating in survey data management or analytic activities.