University of West London

Learning Analytics Policy

Responsibility of:	PVC Education
Original approval date:	September 2016
Review date:	August 2017
Approved by:	Academic Board
Consultation via:	Learning Analytics Policy Group

Contents

1   Introduction

1.1   Overview

1.1.1   Learning analytics is an emerging field and has been variously defined. Jisc defines learning analytics as "the use of data about students and their activities to help institutions understand and improve educational processes, and provide better support to learners".[1]

1.1.2   The University is using learning analytics to help students succeed and achieve their study goals.

1.1.3   This policy defines a set of principles to inform the ethical use of learning analytics at the University and a set of requirements that must be followed by all learning analytics projects.

1.2   Rationale

1.2.1   Data and the use of 'big data' in particular, is increasingly central to understanding people's activities and to decision making and planning across all sectors. The Higher Education Commission suggests that "learning analytics is a powerful way for institutions to achieve their strategic goals as well as providing huge benefits for their students, and that all HEIs should consider introducing an appropriate learning analytics system to improve student support / performance at their institution"[2].

1.2.2   The use of learning analytics is part of the Engagement strand of CREATE Excellence, the University's Learning, Teaching and Assessment Strategy (2014-17).

1.2.3   The need for an institutional policy on the use of learning analytics is widely recommended and early adopters of learning analytics such as the Open University and Nottingham Trent University have developed policies to support their implementations.

1.3   Scope of Policy

1.3.1   This policy covers all uses of learning analytics at the University

1.3.2   The ethical issues relating to the use of student data in academic research are further covered by the University's *Research Ethics Governance Policy* & the *Research Ethics Code of Practice*.

1.3.3   The University bodies considering applications for research using learning analytics should assess if the research projects comply with the 10 principles in this policy. The bodies may, within the remit of their own terms of reference, approve research proposals that test the boundaries of this policy.

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[1] Jisc (2015) *Code of practice for learning analytics*, https://www.jisc.ac.uk/guides/code-of-practice-for-learning-analytics

[2] Higher Education Commission (2016) From Bricks to Clicks: the Potential of Data and Analytics in Higher Education, http://www.policyconnect.org.uk/hec/research/report-bricks-clicks-potential-data-and-analytics-higher-education

2 Principles

2.1 Introduction

2.1.1 The first element of the university policy is a set of overarching and overlapping principles that will inform all learning analytics use at the University.

2.1.2 The University is committed to the ethical use of student data. These principles intend to cover all of the ethical questions that the use of learning analytics raises. The principles are also informed by the University's values in the University Strategy, Ambition 2018: Student-centred, Useful, Challenging, Inclusive, Open and accountable.

2.2 The 10 Principles

2.2.1 Principle 1 – Clarity of Purpose

- The overarching purpose for the use of learning analytics at the University is to help students succeed and achieve their study goals.
- All learning analytics projects should have a clearly defined purpose.
- Learning analytics will not be used as a form of student assessment nor to influence the marking of any student assessments.

2.2.2 Principle 2 – Individuals

- Students will not be wholly defined by their data. This includes the insights and the data generated by learning analytics.
- Learning analytics must not be used to limit the University's or the students' expectations of what they can achieve.
- In the case of predictive analytics based on historical data, it is accepted that there will always be individuals whose behaviours do not follow the typical pattern.

2.2.3 Principle 3 – Openness

- The use of learning analytics should be transparent to all stakeholders.
- The data sources, the purposes of the analytics, who has access to the analytics, the processes involved in producing the analytics and how to interpret the data should be explained clearly to staff and students.

2.2.4 Principle 4 – Consent

- The use of learning analytics is based on informed consent. Students will be explicitly asked to consent to their data being used in learning analytics as part of the enrolment procedure.
- The University will endeavour to ensure that students are fully aware of the implications of this consent.
- Students cannot opt-out of learning analytics as a whole but are able to opt-out of providing certain data to the University.

2.2.5   Principle 5 – Responsibility

- Areas of responsibility for all activities relating to learning analytics should be clearly defined and assigned to specific individuals and groups.

- The PVC Education has overall responsibility and accountability for the use of learning analytics at the University.

2.2.6   Principle 6 – Quality

- The quality and validity of data is essential to the effectiveness of learning analytics

- All stakeholders have a responsibility to maintain accurate and up-to-date records

- Analysis of data and the analytical models should be sound and free from bias.

2.2.7   Principle 7 – Access

- Students will be provided with access to the data and insights generated by analytics whenever possible.

- There may be cases when data and insights cannot be shared because it is impractical or where it might have harmful impact on the student's academic progress or wellbeing.

- Access to student data by staff will be limited to those that have a legitimate need to see it.

- Levels of access for students and staff to data generated by learning analytics will be specified for each learning analytics project. This includes specifying when data may be withheld and who has responsibility for this decision.

- Where data is being used anonymously the University will make every effort to ensure students cannot be identified.

2.2.8   Principle 8 – Partnership

- Representatives of all stakeholders, including staff, students and technology providers (where appropriate) should be involved in designing, developing and reviewing the use of learning analytics and its governance.

- The University will provide appropriate support to staff and students to ensure there is the capacity and capability for the effective use of learning analytics.

2.2.9   Principle 9 – Appropriate Use

- Staff will use learning analytics appropriately and responsibly, in accordance with these principles.

- Only appropriate data will be used. Data sources will be kept to the minimum necessary to deliver the purposes of the analytics reliably. Data in scope will be specified for each learning analytics project.

2.2.10   Principle 10 – Compliance

- The use of learning analytics must comply with external legislation such as the *Data Protection Act* and the *Equality & Diversity Act*, as well as other University policies and regulations such as the *Retention of Data Policy*.

3   Data Scope

3.1   Introduction

3.1.1   This section outlines which student data will and will not be used for learning analytics at the University.

3.1.2   This list is indicative rather than definitive. However, each learning analytics project is required to specify the data in scope on the Learning Analytics Specification Form (see 4 – Requirements).

3.2   In Scope

3.2.1   Categories of data captured by the University that could potentially be used for learning analytics are listed below. This list isn't comprehensive and is subject to review.

- Personal data provided by students at enrolment including age, ethnicity, and gender
- The student's study record (for example, assessment marks)
- Usage and activity data from University teaching and learning platforms such as Blackboard and UWL Replay.
- Usage data from Library systems such as library loans.
- Attendance data recorded by SAM.

3.2.2   If any new data is to be used in learning analytics, the appropriate consent will be sought from students.

3.3   Out of Scope

3.3.1   The University does not typically use the following data:

- Data on student appeals, misconduct, complaints or mitigation.
- Data created on external sites not owned by the University e.g. social networking sites.
- Records of contact with or the use of Student Services.
- Students' Financial Data.

4   Requirements

4.1.1   All learning analytics activities at the University must adhere to the ten principles in this policy.

4.1.2   Significant learning analytics activity (institutional, school or course-based projects for example) are required to complete a Learning Analytics Project Specification Form (see Appendix A). The form is not required for academic research projects involving learning analytics.

4.1.3   The Learning Analytics Project Specification Form must be submitted to and approved by the PVC Education.

4.1.4   The Learning Analytics Project Specification Form outlines the project purpose and specifies areas of responsibility. It also identifies which data will be in and out of the

scope of the project and the levels of access to the insights and data generated by the project.

5 Review

5.1.1 This policy is subject to regular review by the PVC Education and may be updated at any time subject to appropriate communication to stakeholders. In line with *Principle 9 – Partnership*, any policy review should involve stakeholder representation.

6 Acknowledgements

6.1.1 This policy has been developed by the University's Learning Analytics Policy Group based on Jisc's Code of practice for learning analytics[3] and the Open University's learning analytics policy[4]. Both documents are made available under a creative commons licence. As required by the Open University's licence, this policy is available under the same terms.

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[3] Jisc (2015) *Code of practice for learning analytics*, https://www.jisc.ac.uk/guides/code-of-practice-for-learning-analytics (Accessed August 2016).
[4] Open University (2014) *Ethical use of Student Data for Learning Analytics Policy*, http://www.open.ac.uk/students/charter/essential-documents/ethical-use-student-data-learning-analytics-policy

Appendix A – Learning Analytics Project Specification Form

This form should be completed for all learning analytics projects at the University (except for academic research proposals). Completed forms should be submitted to the PVC Education for approval. Please read the **Guidance Notes** below before completing this form.

Project Name:			Date:
Project Lead		Project Manager	
Project Purpose			

Project Outline

Alignment to 10 Principles

Timeline

Data	
Data Sources (*Add rows as required*)	Data in Scope

Access to Learning Analytics (Systems & Data)
Staff
Students

Areas of Responsibility	
Responsibility (*Add rows as required*)	Individual or Group Responsible

Guidance Notes

- All sections of the form must be completed.

- **Project Purpose** – This relates to *Principle 1 – Clarity of Purpose* of the University's Learning Analytics policy. The intended aim of the project must be clearly specified.

- **Project Outline** – This section should provide an overview of the project, how it intends to achieve its aim and how the data will be used. The mechanics of the leaning analytics project should be explained here, including an explanation of any tools or systems that will be used for analysis.

- **Alignment to 10 Principles** – This section should outline how the project aligns with the 10 principles of the University's Learning Analytics Policy.

- **Timeline** – This section should outline the proposed timeline, including key milestones.

- **Data** - This relates to *Principle 9 – Appropriate Use* and the *Data Scope* section of the University's Learning Analytics policy. All data to be used in the project must be specified here.

- **Access To Learning Analytics** - This relates to *Principle 7 – Access* of the University's Learning Analytics policy. The form must specify who (covering both staff and students) will have access to the insights and the data generated by the learning analytics project.

- **Areas of Responsibility** - This relates to *Principle 5 – Responsibility* of the University's Learning Analytics policy. The list should be as detailed as possible to clearly define the boundaries of responsibility.