

Learning Analytics Policy

Responsibility of: Chief Information Office and Associate
PVC

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Approved by: Academic Board

Consultation via: Learning Analytics Policy Group

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1. Introduction

- 1.1 The University is using learning analytics to support students to succeed and achieve their study goals.
- 1.2 The University is committed to the ethical use of student data. The principles set out in this policy are intended to cover all of the ethical questions that the use of learning analytics raises. The principles are also informed by the University's mission and values as set out in the University Strategy, Achievement 2023.
- 1.3 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
- 1.4 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.

2. Scope of Policy

- 2.1 This policy only applies to learning analytics which provide a prediction or other information at individual student level which is used to inform direct interventions to students.
- 2.2 This policy does not apply to Planning activities which are using student data to monitor the effectiveness of teaching and learning and engagement activities. It also does not cover academic research. These activities should be undertaken in accordance with the University's *Research Ethics Governance Policy* & the *Research Ethics Code of Practice*.

3. Relationship to other policies

- 3.1 This policy should be read in conjunction with the University's Data Protection Policy.

4. The 10 Principles

- 4.1 Principle 1 – Clarity of Purpose
 - The overarching purpose for the use of learning analytics at the University is to support students to 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.
- 4.2 Principle 2 – Individuals
 - Students will not be solely defined by 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.
 - Any derived data or insights will not be used to inform academic judgements

¹ Jisc (2018) *Code of practice for learning analytics*, <https://www.jisc.ac.uk/guides/code-of-practice-for-learning-analytics>

about the student.

- It is accepted individuals behaviours do not necessarily follow a prescribed or typical pattern.

4.3 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 students.

4.4 Principle 4 – Consent

- The use of special category data (in this case ethnicity) is based on informed consent. Students will be explicitly asked to consent to their special category data being used in learning analytics as part of the enrolment procedure.
- Students may choose not to provide special category data at enrolment or subsequently.
- The University will ensure that students are fully aware of the implications of this consent.

4.5 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 Associate PVC and Chief Information Officer has overall responsibility and accountability for the use of learning analytics at the University subject to governance by a Steering Committee
- The University Secretary and Chief Compliance Officer is responsible for ensuring that learning analytics is in line with the University's data protection Policy
- All users of learning analytics and especially the Director of Strategic Planning and the Head of Engagement must ensure compliance with this policy.

4.6 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.

4.7 Principle 7 – Access

- Students are legally entitled to see the data the University holds about them.
- Any insights from learning analytics projects should be communicated sensitively if students request access to them.
- 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 sure students cannot be identified.

4.8 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.

4.9 Principle 9 – Appropriate Use

- Staff will use learning analytics appropriately and responsibly, in accordance with these principles.
- The University will provide appropriate support to staff to ensure there is the capacity and capability for the effective use of learning analytics.

4.10 Principle 10 – Compliance

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

5. Data Scope

5.1 In accordance with Principle 10, the University will only use appropriate data. The University does not, however, 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 unless students expressly consent to this at the point of contact or use.
- Students' Financial Data other than that provided as part of their studies and included in HEBBS (SLC) or in the University's scholarship and bursaries records.

6. Project Approval and Oversight

6.1 All learning analytics activities at the University must adhere to the ten principles in this policy and this will be monitored by the Steering Group. The Steering Group will have an agreed terms of reference and will include the Chief Information Officer and Associate PVC, the PVC (Student Experience), the University Secretary, the Director

of Strategic Planning and representatives from Expert, the Engagement Team, the SU and also an academic user. The Steering Group will report to LTAC.

- 6.2 All 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 planning or academic research projects involving learning analytics which are subject to ethical approval.
- 6.3 The Learning Analytics Project Specification Form must be submitted to and approved by the Steering Group.
- 6.4 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.

7. Data protection

- 7.1 The University is undertaking learning analytics on the basis of 'public task'. This means that the data is processed in line with the University's powers to deliver higher education and research under the 1988 Education Reform Act. Where the University uses special category data (and at present it only uses ethnicity) it does so on the basis of consent which is gathered at enrolment.
- 7.2 In terms of our obligations to inform students of the processing, this is undertaken through student handbooks, information on the website and also emails to students informing them of the purpose of learning analytics.

8. Review

- 8.1 This policy is subject to regular review by 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.

9. Acknowledgements

- 9.1 This policy has been developed by the University's Learning Analytics Policy Group based on Jisc's Code of practice for learning analytics² and the Open University's learning analytics policy³. 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.

² Jisc (2015) *Code of practice for learning analytics*, <https://www.jisc.ac.uk/guides/code-of-practice-for-learning-analytics> (Accessed August 2016).

³ 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 Associate PVC and Chief Information Officer 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 (<i>Add rows as required</i>)	Data in Scope

Access to Learning Analytics (Systems & Data)	
Staff	
Students	

Areas of Responsibility	
Responsibility (<i>Add rows as required</i>)	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 learning 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.