

LANCASTER UNIVERSITY

Learner Analytics Policy

1. Scope and Purpose of the policy

- 1.1 Learner analytics is defined by Jisc 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
- 1.2 Learner analytics serve two broad purposes:
 - i) At the macro-level it supports the aggregation of information about students which can be used to inform improvements to learning processes, structures and supports.
 - ii) At the micro-level it can be used to drive short-, medium- or long-term supportive interventions for individual students, primarily in the form of individual advice and guidance intended to support the student’s progression, achievement and completion.
- 1.3 As learner analytics develops, its use may be extended to include areas such as: personalised learning paths, adaptive learning, personalised feedback, intelligent e-tutoring, etc. These developments will be subject to the requirements of this policy, and it is recognised that it may be necessary to review the policy to meet the requirements of these emerging uses.
- 1.4 This policy defines a set of principles to inform the proper use of learner analytics at Lancaster University, describes which student data is in and out of scope, and sets out the requirements and oversight for those using learner analytics.
- 1.5 Other uses of learner analytics, for example for academic research purposes, fall outside this policy, and are subject to other policies such as the Research Ethics Policy.
- 1.6 For the avoidance of doubt, the University will not use learner analytics data alone to make decisions about student progression or assessment outcomes, nor will it sell or use learner analytical data or its analysis for commercial purposes other than for the improvement of the student learning experience and related academic research and subject to the ethical approvals noted in 1.5 above.

2. Principles of the policy

- 2.1 Lancaster University is committed to the ethical use of student data and the derived learner analytics. To achieve this, work relating to learner analytics will be informed by the following principles:
- 2.2 Principle 1 – Ethics

Good governance will be used to ensure that learner analytic projects and implementations are ethically conducted and align with Lancaster’s strategy, values and relevant policies.²

¹ JISC (2015) *Code of practice for learner analytics*, <https://www.jisc.ac.uk/guides/code-of-practice-for-learning-analytics>

2.3 Principle 2 – the individual

Students will not be defined solely by learner analytics data. Learner analytics will not be used to limit the University's or the student's expectations of what they can achieve. It is fully recognised that student behaviours do not always follow typical patterns. No decisions relating to progression, assessment or award will be taken on the basis of learner analytics alone.

2.4 Principle 3 – active agents

Students will be engaged in the implementation of learner analytics. The University will pursue this by means of the established student representation within the University's governance structures and the inclusion of the student voice in the quality assurance and enhancement processes.

2.5 Principle 4 – clarity of purpose

The overarching purpose for the use of learner analytics is to help students to succeed and to improve and enhance teaching and learning practice. Learner analytics will not be used as a form of student assessment, nor to influence marking of any student assessment, but may be used in aggregate to shape and develop assessment practices and processes.

2.6 Principle 5 – consent

The use of learner analytics is based on the informed consent of the student. Consent for the purpose of combining data drawn from multiple systems with other data to produce learner analytics may be refused. The implications of refusal will be made clear (e.g. that the student may not have access to support/interventions to support their successful completion which may otherwise have been provided to them on the basis of analytics). Students will have the opportunity to update their own data and consent agreements annually at registration, or at any time in response to a direct request (to which the University must respond within a reasonable time-frame).

2.7 Principle 6 – openness

The use of learner analytics will be transparent to all stakeholders. The data sources, the nature and purposes of the analyses, and who has access to these, will be clearly explained to staff and students.

2.8 Principle 7 – access

Typically staff will be reviewing derived analyses of data rather than the underpinning raw data that the analysis is based on and students will normally have access to those analyses which relate to them individually. Students are legally entitled to see analyses which relate to

² Including local policies supporting compliance with data protection legislation, retention and the University's Information Security Policy.

them as an individual and, should they so wish, the related personal data the University holds and which underpins this..

2.9 Principle 8 – confidentiality

Personally identifiable data and analytics will be provided only to: the student, University staff members who require the data to support the student, and to others with a legitimate need.

Technical staff and their contracted agents will have access to systems and data to maintain proper functioning. Any third party data processing will be undertaken according to formal and legally binding data sharing agreements.

2.10 Principle 9 – validity

The quality, robustness and validity of the analyses and underpinning data, including freedom from bias, are the responsibility of the University for which all reasonable endeavours will be made. Any errors identified in the data or analyses at the level of an individual student will be corrected expeditiously.

2.11 Principle 10 – compliance

The use of learner analytics will comply with Data Protection, Equality and Diversity and other relevant applicable legislation, as well with University policies and regulations in relation, for example, to data retention.³

3. Requirements

3.1 In addition to adherence to the principles detailed above the following requirements are identified in relation to this policy.

3.2 Responsibility

The overall responsibility and accountability for the use of learner analytics at Lancaster University rests with the Pro-Vice-Chancellor (Education).

Areas of responsibility for all activities relating to learner analytics should be clearly defined and assigned to specific individuals and groups as set out in Schedule 1.

3.3 Supportive interventions

A range of supportive interventions may take place with students. A record of such interventions will be kept and will be analysed for effectiveness.

3.4 Student access

Mechanisms will be developed to enable students to access their personal data and the related learner analytics in a meaningful accessible format and to request corrections to inaccuracies in the data.

³ Learning analytics data linked to an individual will be retained for a period of 12 months after graduation.

3.5 Support

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

3.6 Compliance

The Data Protection Officer will play a role in advising on approaches and practises which ensure compliance with data protection legislation.

4. **Scope of the data**

4.1 Within learner analytics, the following are deemed to be in scope for processing to support student learning at an *individual* level:

- Personal information provided by the student in the course of application and registration;
- The student's study record held by the University;
- Relevant sensitive information that the University has consent from the student to process (currently obtained at registration);
- Attendance data
- Details of contact between the enquirer or student and the University;
- Content generated by enquirers or students; for example, responses to surveys, etc., other than where these indicate they are anonymised (e.g. NSS).
- System-generated data, relating for example to VLE and library systems usage;
- Data derived by the University from other data, for example, whether a student falls into a widening participation category;
- Data held or generated internally in combination with data provided by a third party.

4.2 Within learner analytics, the following are *additionally* deemed to be in scope for processing to support student learning at an *aggregate* level:

- Anonymised data from external sites, for example social media sites not owned by the University, where this is used to generate information on the cohort rather than the individual student;
- Anonymised data generated by enquirers or students; for example, responses to surveys, etc.;
- Anonymised student financial data.

4.3 Processing of the analytics highlighted in 4.1 may take place to support the aggregation of information about students to inform improvements to learning processes, structures and supports provided that information is anonymised prior to further analysis.

4.4 Within learner analytics, and subject to further review, the following currently are deemed to be out of scope for collection and analysis in relation to individuals:

- Data on student appeals, complaints and misconduct;
- Data that identifies individuals on external sites, such as social media sites where there is no permission to share information;

- Records of student fees payment or debt
- Records of contact with Student Counselling and Wellbeing services.

4.5 Special characteristics data as defined by Article 9, Paragraph 1 of the General Data Protection Regulation may be used as part of the analyses where the use of sensitive data can be demonstrated to improve significantly an aspect of student learning and the student has consented to this processing.

5. **Monitoring of this policy**

5.1 The Divisions of Strategic Planning and Governance, Student Based Services and Information Systems Services, along with the Pro-Vice-Chancellor (Education) and the Data Protection Officer, will keep the implementation of this policy under review and bring matters for consideration, as required, to the Education Committee.

5.2 An annual report on the use and effectiveness of learner analytics will be submitted to the Education Committee and the Data Protection Officer.