Sheffield Hallam University

Institutional Learning Analytics Code of Practice

Introduction

1. The collection and use of data about students and their learning is providing new opportunities for institutions to support learners and to enhance educational processes. Learning analytics systems ("Learning Analytics") present visualisations of student learning activity. These will be used at Sheffield Hallam University ("the University") to assist current students in achieving their study goals, and to help improve the University's overall provision of education.

2. As part of the University 'Transforming Lives' strategy, the University will use Learning Analytics to help meet the following objectives:

   • increasing student retention and progression and student success
   • increasing the engagement of students with their learning experience
   • enabling effective student support
   • enhance the University's approach to learning and teaching based on evidence
   • operating sustainably, investing in functions that support the corporate strategy

   Our Student Support framework is a key enabler for learning analytics at Hallam. Each student has a named Academic Adviser, Student Support Adviser, and an Employability Adviser to provide a comprehensive support offer. The Academic Adviser and Student Support Adviser are critical components in monitoring students' progress and providing support and encouragement throughout their learning journey.

3. Learning Analytics **will not** be used for:

   • automated decision-making (deciding solely by automated means without any human involvement)
   • automated processing of personal data to evaluate certain things about an individual (profiling)
   • the purposes of assessment of academic work

4. The University will ensure that Learning Analytics is deployed for the benefit of students, with complete transparency about the data that is being captured, processed and used. All activities in this area will comply with the institution's Information Governance Policy.

5. Learning Analytics will be used to support the implementation of the University's Student Engagement Policy. Academic colleagues are required to use Jisc Data Explorer to record attendance at all taught sessions and encourage students to register their attendance using Study Goal. Further information can be found on Learning Analytics SharePoint site and in the Student Attendance and Engagement – Staff Guidance.

Responsibility

6. Overall responsibility for Learning Analytics and its use at the University is held by the Dean of Students. Responsibility for relevant areas of activity is allocated as follows:

    6.1 The collection of data to be used for Learning Analytics – Head of Applications.
    6.2 The anonymisation or de-identification of data where appropriate – Head of Applications.
    6.3 The analytics processes to be performed on the data and their purposes – Dean of Students.
    6.4 The interventions to be carried out based on the analytics – Director of Student Support Services, Director of Academic Services, and Head of Academic Advising.
    6.5 The retention and stewardship of data used for and generated by learning analytics – Dean of Students.

7. Learning Analytics information presented to students is intended to help them understand their engagement with the University. Advice and guidance related to these Learning Analytics may be provided by University staff including, but not limited to, Academic Advisers and Student Support Advisers[1]. Students are responsible for assessing how they can best apply such advice and guidance to their learning.

8. Prior to using the Learning Analytics, University staff will be required to complete mandatory training on unconscious bias and data protection[2].

9. University staff using the Learning Analytics solution will comply with the Staff Responsibility for Information Security Policy.

10. Staff will act responsibly in determining when and how to assist students achieve their study goals and improve their overall learning experience through reference to Learning Analytics, particularly when a student may be vulnerable to harm e.g., is experiencing a period of mental ill health.

Transparency and legitimate interest

11. Students are informed about how their data will be processed when they are offered a place at the University, when they agree to the University's terms and conditions upon registration, and when they re-enrol. This information is provided via the University's Privacy Notice for students and personal data will be collected for Learning Analytics purposes in compliance with the Privacy Notice. The Privacy Notice is published on the University's website.

12. The processing of personal data for Learning Analytics purposes is necessary for the legitimate interest of the University in supporting students (see point 2 of the Privacy Notice for students). A formal assessment of these interests has been carried out and the University is satisfied that these are not overridden by the interests or fundamental rights and freedoms of the data subjects in question.

13. The data for Learning Analytics comes from a variety of sources, including the student records system and the virtual learning environment. The Student Guide to Learning Analytics will clearly specify:

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[1] https://www.shu.ac.uk/myhallam/help-and-support
[2] Accessed via My Hallam – Blackboard – 'HROD People Development' Organisation site - General Data Protection Regulations (GDPR)

- The data sources being used for Learning Analytics.
- The specific purposes for which Learning Analytics is being used.
- The data sources being used and how an engagement indicator has been produced.
- Who has access to Learning Analytics, and why.
- Guidance on how students can interpret any Learning Analytics provided to them.

Confidentiality

14.   Personally identifiable data and Learning Analytics on an individual student will be provided only to:

- The student
- The University staff members who require the data in their professional capacity
- Third parties which are processing Learning Analytics data on behalf of the University. In such circumstances the University will put in place contractual arrangements to ensure that the data is held securely and in compliance with the data protection legislation.

15.   The University's Safeguarding Policy ensures that University staff work in a manner to protect students who are vulnerable to harm so that they can participate in a safe and secure environment, and their parents/carers can have confidence in the University. There are clear arrangements for reporting concerns and liaising with external authorities where action, advice or support is required. Learning Analytics may be used to support the delivery of the Safeguarding Policy. Data sharing in these circumstances will be carried out in accordance with the University's Privacy Notices and Data Sharing Agreements, and only where there is a clear lawful basis.

16.   The University IT staff will have access to systems and data in order to maintain proper functioning of IT systems rather than to access any individual's data.

Sensitive data

17.   Data protection legislation defines "special categories of personal data" which include information about a student's ethnicity and disability. The University only uses such data where there is a clear lawful basis for doing so. The University's Information Governance Policy and Special Category Personal Data Policy govern this processing which will be documented in The Student Guide to Learning Analytics.

Validity

18.   The quality, robustness and validity of the data and analytics processes will be monitored by the University, which will use its best endeavours to ensure that:

- Data are accurate.
- The optimum range of data sources to achieve accurate analytics information is selected.
- Spurious correlations and conclusions are avoided.
- Learning Analytics is seen in its wider context, and is combined with other data and approaches as appropriate.

19.   Students have the right to correct any inaccurate personal data held about them, via My Student Record.

Student access to Learning Analytics data

20.　　Students will be able to view their Learning Analytics data via the Learning Analytics Study Goal web app, available at https://shu.studygoal.jisc.ac.uk.

21.　　Students can request sight of the staff view of their Learning Analytics data via their Academic Adviser.

22.　　If students would like to request copies of their own personal data held by the University, they are entitled to submit a SAR (a subject access request).

Interventions

23.　　A range of interventions may take place with students, initiated by Academic Advisers, the Student Success and Engagement team, or the UK Visas and Immigration (UKVI) Compliance team. The types of intervention and what they are intended to achieve are documented in the Student Guide to Learning Analytics. These may include:

　　23.1　　Staff contacting an individual based on the analytics if it is considered that the student may benefit from additional support.
　　23.2　　Prompts or suggestions sent to the student via email.

24.　　Interventions will normally be recorded and subject to periodic reviews as to their appropriateness and effectiveness.

25.　　Metrics derived from data sources input into the learning analytics system will not be used for assessment purposes. However, some of the original data sources owned by the University may be used separately for monitoring of attendance, outside of the learning analytics system.

Minimising adverse impacts

26.　　The University recognises that Learning Analytics cannot present a complete picture of a student's learning.

27.　　Students will retain autonomy in decision-making relating to their learning; the Learning Analytics are provided to help inform their own decisions about how and what to learn.

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