

Learning Analytics Policy



1. Purpose

Bath Spa University is fully committed to enabling all our students to thrive and to enable their learning journey during their programme of study and ensuring that “our student experience will be characterised by a focus on support and wellbeing”.

This policy details the University’s approach to transforming our students’ learning experiences and helping them achieve their learning goals through the data collection, visualisation and application of learning analytics and the legal and ethical safeguards in place.

Implementing the use of learning analytics at Bath Spa is designed to assist our students to monitor their own engagement, understand the implications of their level of engagement and support them to access the right support for them at the right time and achieve better outcomes. It will also help us understand when, where and how students engage – or do not engage - with their studies and wider learning experience and enable us to respond effectively, assess the impact of our interventions and activities and deliver proactive improvements to our services to better support student success. Learning analytics therefore provides us with the capability to positively influence student engagement and retention through understanding students’ digital interactions with their learning. It will enable the development of much more robust and data-driven early interventions designed to assist students meet their learning aspirations.

This policy covers uses of learning analytics as part of the My Engagement Dashboard by students and staff at the University.

This policy document is designed to complement the University’s Regulations and any relevant policies. It has been developed in line with the [Code of Practice for learning analytics](#) and model policy template provided by JISC (2015) and the Data Protection Legislation .

2. Definitions

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| a. Data Protection Legislation | All legislation in force from time to time in the United Kingdom relating to privacy and the protection of personal data, including the Data Protection Act 2018 and the UK General Data Protection Regulation (UK GDPR) |
| b. Engagement | Engagement is defined as participation in 'academically purposeful activity' |
| c. Learning Analytics | The use of data about students and their learning and teaching activities to help institutions understand and improve educational processes, and provide better support to learners. Code of |

[practice for learning analytics | Jisc](#). In the context of this policy, learning analytics refers to the data sources used in the My Engagement platform.

Learning analytics is the measurement, collection, analysis and reporting of data about learners and their contexts, for purposes of understanding and optimising learning and the environments in which it occurs. Siemens & Gašević, 2012.

- d. Engagement Data Engagement data refers to data that can be used to measure a student's engagement/interactions with their studies / their learning. It provides a digital activity footprint of learning engagement interactions which serve as a proxy for student engagement.
- e. Data Sources The data sources used as part of learner analytics. At Bath Spa, this will include: the virtual learning environment (VLE), engagement and assessment activity together with attendance and learning resources data. It also draws data from the student records contained within our Student Records System (SITS) and the Library System.
- f. My Engagement Dashboard A visualisation of student learning activity that can be accessed by students and specified staff as determined by their roles and responsibilities. The dashboard provides an engagement score based on the overall interactions captured by the learning analytics data sources.
- g. Special category data Personal data that reveals information about a data subject's racial or ethnic origin, political opinions, religious or philosophical beliefs, trade union membership, genetic data and biometric data processed for the purpose of uniquely identifying a natural person, data concerning health and data concerning a natural person's sex life or sexual orientation.
- h. Privacy Notice A document given by an organisation to an individual setting out the purposes for which their personal data is collected and processed. The

University's relevant Privacy Notice is the [Applicant and Student Privacy Notice](#).

- i. Interventions
Effective use of learning analytics enables the University to proactively communicate, engage with and offer appropriate support and interventions to help student's retention, progression and outcomes. Engagement indicators are used to initiate conversations with students. This could include follow up emails, phone calls, referrals as well as providing active support in the form of assessment and engagement action plans.
- j. VLE
Virtual Learning Environment provided by Blackboard: Minerva
- k. SITS
University's Student Record System
- l. SLC
Student Loan Company
- m. UKVI
UK Visa and Immigration department
- n. My Student App
My Student app enables students to record their attendance at their timetabled learning and teaching sessions.

3. Introduction

The University will use learning analytics to help meet the following strategic objectives: supporting student engagement, increasing student retention and progression, improving attainment and better supporting students throughout their student journey. These are key elements of the Education Strategy and the University's Student Engagement policy.

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 to help students in their studies and learning goals. Students will be able to access their learning analytics, reflect upon and understand their patterns of engagement as part of encouraging greater student agency to meet their learning objectives. A key driver has been to improve student support by enabling proactive, meaningful, timely and targeted student engagement and retention resources and interventions on both a cohort and individual basis.

The learning analytics platform also enables the University to comply with its statutory reporting requirements such as the UK Visa and Immigration department (UKVI) attendance requirements for students studying under the Student Route.

All activities in this area will comply with the University's [Data Protection](#) Policy and with the Data Protection Legislation. Data sources will be kept to the minimum necessary to deliver the purposes of the learning analytics as part of our overall Student Engagement strategy. Reference to our use of learning analytics is included in our [Student and Applicant Privacy Notice](#).

4. Scope

Learning analytics is used to ensure our programmes, resources and support services are designed and delivered in an effective and flexible way, working in partnership with our students and staff. It provides a snapshot of how engaged students are in their learning which can be used to identify students who are most likely to need assistance and may be at risk of disengagement with their studies. It effectively facilitates the University's capability to put in place early intervention measures to help student progression and attainment.

The use of learning analytics as part of the My Engagement platform covers all our undergraduate and postgraduate taught provision at the University. All franchised and validated partnership provision is out of scope of this policy.

5. Principles

This policy defines a set of principles to govern and inform its approach to learning analytics and ensure that this is applied ethically for the benefit of students.

The following principles apply:

1. Purpose of, and, the use of student data and analytics, is clear, transparent and accessible to staff and students
2. Use of student data and analytics is carried out in compliance with Data Protection Legislation
3. Student data and analytics will be used responsibly, appropriately and confidentially by staff, in accordance with this policy and its principles as part of embedding data-driven assistance for students across the University.
4. Ensuring the quality, robustness and validity of the data and analytics processes will be actively managed and monitored by the University
5. Working in partnership by engaging with students around the implementation, communication and application of learning analytics. Listening to students' feedback is important to enable us to effectively tailor any student engagement and retention interventions appropriately.
6. Effective application of learner interventions and resources designed to check in and offer timely, proactive support and assistance to our students on the basis of the engagement profile.

5.1 Transparency and Accessibility

1.

The purpose for, and, the use of learning analytics is clear, transparent and accessible to staff and students.

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 will be explained clearly to staff and students.

Students will be able to access their personal data. Mechanisms will be developed to enable students to access their personal data, and the learning analytics performed on it, at any time in a meaningful, accessible format. Students have the right to correct any inaccurate personal data held about themselves. Students will also be able to view any metrics derived from their data, and any labels attached to their data through the learning analytics engagement dashboard 'My Engagement'.

5.2 Compliance with Data Protection Legislation

The use of learning analytics at the University will be carried out in compliance with Data Protection Legislation, and following the University's Data Protection Policy.

The University considers that the legal bases for processing personal data as part of the learning analytics are:

- the processing is necessary for the performance of a contract (ie the University's Study Terms and Conditions);
- the processing is necessary for the performance of a task carried out in the public interest.

The processing of personal data as part of the learning analytics will be in accordance with the Data Protection Principles set out in the University's Data Protection Policy, and specifically:

- Students will be explicitly informed about how their data will be processed as part of the Student and Applicant Privacy notice, the University's terms and conditions and through student guides and briefings to ensure that they are fully aware of the use of learning analytics by the University
- Personal data captured in the learning analytics will be accurate and kept up to date; and
- Personal data captured in the learning analytics will not be excessive
- The University will take technical and organisational measures to protect the personal data captured in the learning analytics.

Students will not be able to opt-out of learning analytics as a whole but the University has limited the use of sensitive / personal data as part of the learning analytics dataset.

The data for learning analytics comes from a variety of sources, including attendance data logged through the My Bath Spa student app, the student record system and the virtual learning environment. The Student Guide to Learning Analytics [[link to document](#)]

in student section of institutional website] will clearly specify:

- The data sources being used for learning analytics
- The specific purposes for which learning analytics is being used
- The metrics used, and how the analytics are produced
- Who has access to the analytics, and why
- Guidance on how students can interpret any analytics provided to them
- The interventions that may be taken on the basis of the analytics

Students will be able to opt out of any automated prompts or suggestions to be sent to them, based on the analytics. These may include emails, SMS messages or app notifications

All the learner data collected, analysed and visualised for learning analytics will be in compliance with these documents and the legal requirements.

5.3 Responsible, Confidential and Appropriate Use

Student data and learning analytics will be used responsibly, appropriately and confidentially by staff, in accordance with this policy and its principles. Staff access will be limited to those identified by the University as having a need to know given their current role, remit and responsibilities. Personally identifiable data and analytics on an individual student will be provided only to:

- The student
- University staff members who require the data to support students in their professional capacity
- Third parties which are processing learning analytics data on behalf of the institution. 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.
- Other individuals or organisations to whom the student gives specific consent
- University IT staff will have access to systems and data in order to maintain proper functioning of systems rather than to access any individual's data.

Where data is to be used anonymously particular care will be taken by the University to avoid:

- Identification of individuals from metadata
- Re-identification of individuals by aggregating multiple data sources

Learning analytics will be used for students' benefit and for the University to proactively offer assistance and signposting to resources and services, and the overall support and learning experiences for individuals and for the student body as a whole. It will never be used for the purposes of assessment and in no case will an automated decision be made about students purely based on the learning analytics platform. The data will be primarily used to offer services and early interventions by the Student Engagement and Retention

team in Student and Registry Services, Student and Wellbeing teams and by Academic Advisers as part of the University's Academic Adviser system. The Learning Analytics dashboard enables appropriate referrals to key University services to enable timely and proactive advice and guidance to be offered to students.

The Student Information, Student Finance and Immigration Compliance and Advice teams will also use learning analytics data to comply with regulatory requirements such as Student Loan Company reporting and UK Visa and Immigration (UKVI) attendance monitoring for international students. In particular, attendance and engagement data is required for future inspections by the UKVI and will be retained in line with the Home Office Sponsorship guidance.

Reviewing and acting upon any aggregated / anonymised data cohort or course engagement and attendance data trends identified may also form part of the University's quality assurance process as part of our approach to supporting quality enhancements.

5.4 Quality, Validity and Stewardship of data

Ensuring the quality, robustness and validity of the data and analytics processes will be actively managed and monitored by the University, which will use all reasonable endeavours to ensure that:

- Inaccuracies in the data are understood and minimised
- The implications of incomplete datasets are understood
- The optimum range of data sources is selected
- Spurious correlations and conclusions are avoided
- The algorithms and metrics used for predictive analytics and interventions are understood, validated, reviewed and improved as appropriate.

Bath Spa University will also ensure that the data and learning analytics are seen in its wider context, and combined with other data and approaches as appropriate. The University also recognises that learning analytics cannot present a complete picture of a student's learning and engagement activity, and may not always be accurate given the fluid nature of the learning analytics dataset.

Students will retain autonomy in decision making relating to their learning; the analytics are provided to help inform their own decisions about how to engage in and manage their learning. As part of this students will be able to view cohort level data as part of the My Engagement dashboard so they can evaluate their engagement against their cohort.

5.5 Working in partnership by engaging with students and staff

The University is committed to working in active partnership with students as part of ensuring the effective implementation, communication and application of learning analytics. Listening to students' feedback is important to enable us to ensure that the University tailors its communication approaches and student engagement and retention

interventions appropriately for maximum benefit to our students.

5.6 Learner Interventions and resources

A range of interventions (wellbeing, pastoral, support) may take place with students where analytics suggest that a student may benefit from additional assistance. The types of intervention and what they are intended to achieve will be documented in the Student Guide to Learning Analytics. These may include:

- Prompts sent automatically to the student from the My Engagement Dashboard via email, SMS message or mobile app notification (students can opt-out of alerts) based on engagement thresholds
- Staff contacting an individual on the basis of the analytics if it is considered that the student may benefit from additional assistance. This will primarily be led by either the Student Engagement and Retention team or the relevant Academic Adviser.
- Referring students to key Student Services e.g. Student Information team, Student Wellbeing Services, the Writing and Learning Centre, Graduate College
- Signposting students to particular resources and toolkits that they might find helpful or referring students via channels such as the Progress scheme, Support to Study, Academic Access Plans etc.
- Where a student's pattern of engagement falls below the levels expected for a sustained period, further interventions or actions may be necessary in order to help ensure successful progression and completion of awards.

The purpose of these interventions will be to reach out as early as possible to students to check in with them about their studies. All interventions will be based on conversations with the students as part of determining what action, supportive measures or further assistance from the University (or elsewhere), if any, would be of benefit.

Interventions, whether automated or initiated by members of staff, will normally be recorded and will follow the University's Data Protection Policy and other relevant University policies, processes and protocols.

6. Student Data

This outlines the student data sources that are currently in and out of scope of the University's My Engagement learning analytics platform as part of ensuring that these are clearly communicated to all staff and students.

In scope

In the first year of implementation of learning analytics the University will be using the following data sources as part of its learning analytics platform:

- Attendance data recorded for centrally timetabled learning and teaching activity via the MyBathSpa student app (CampusM)

- Usage and activity data from the University's virtual learning environment (VLE) platform, Minerva (Blackboard Ultra).
- Assessment activity data captured through the VLE
- Student Record

The intention will be to add usage and activity data from the University's Talis Resource List system and Soprano, the Library system, in future years to provide a visualisation of engagement data with the library and learning services resource lists and learning, teaching and research collections.

Out of scope

- Student Provisional and confirmed assessment results
- All other learning analytics outside of the My Engagement dashboard.

The student data that form the learning analytics metrics will be kept under review in order to ensure that the dataset is enabling actionable insights and information that help the University plan its provision of services to meet the needs of our student body.

7. Responsibilities

The Pro-Vice Chancellors for Academic Planning and Student Experience have shared overall responsibility and accountability for the effective use of learning analytics at the University.

Areas of responsibility for all activities related to learning analytics will be clearly defined and assigned to relevant teams and departments.

Analytics presented to students are intended to help them understand how their learning is progressing, and suggestions may be made as to how they can improve their practices. Students are responsible for assessing how they can best apply any such suggestions to their learning.

8. Review

This policy will be reviewed annually in its first year of operation and thereafter every three years to ensure that it is kept up to date and reflects current practice.

9. Acknowledgements

This policy has been based on discussions with colleagues from across the University including members of the Senior Leadership Group, Academic Governance and Policy, Governance Legal and Compliance, IT Services, Student and Registry Services, Student Wellbeing Services and Library and Learning Services.

It has been informed by the JISC Code of Practice for learning analytics and the model policy template and the Data Protection Legislation.

Document Details

Responsible Office: Student and Registry Services

Responsible Officer: Registrar and Head of Student and Registry Services

Approving Authority: Academic Board

Date of Approval: July 2022

Effective Date: September 2022

Related Policies and Procedures:

- Data Protection Action Plan (DPIA)
 - Data Protection Policy
- Engagement and Attendance Policy
- Privacy Notice for Students and Applicants
 - Equality Policy

<https://www.bathspa.ac.uk/about-us/governance/policies/>

Supersedes: n/a

Next review due: July 2023