

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 institution 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
3. Learning Analytics **will not** be used for:
 - automated decision-making (making a decision 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 may be used to support the implementation of the University's [Student Attendance and Engagement Policy](#).

Responsibility

6. Overall responsibility for Learning Analytics and its use at the University is held by the 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 Advisers¹. Students are responsible for assessing how they can best apply such advice and guidance to their learning.

¹ <https://www.shu.ac.uk/myhallam/help-and-support>

8. Prior to using the Learning Analytics, University staff will be required to complete mandatory training on [unconscious bias](#) and data protection².
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:
 - 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

² Accessed via My Hallam – Blackboard – ‘HROD People Development’ Organisation site - General Data Protection Regulations (GDPR)

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 app, available in App Store and Play Store.
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](#)).

Minimising adverse impacts

23. The University recognises that Learning Analytics cannot present a complete picture of a student’s learning.
24. 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.

Version:	1.0		
Original Version Approved by and date:	Learning Analytics Steering Group, November 2019		
Owner:	Student Experience Teaching and Learning		
Date for Review:	July 2022		
Amendments:	Detail of Revision:	Date of Revision:	Revision Approved by: