Learning Analytics Policy

Version number	Date approved (including committee)	Reason for production/revision	Author	Proposed next review date
V1.0	Q4 22-23 IGG Group	Required as part of introduction of Learning Analytics.	Business Development Director	Annually or as required

Related policies
Information Governance Framework and associated policies: Data Protection Policy   Records Management Policy   Data Security Policy   ICMP Terms and Conditions   ICMP privacy notices

External Reference
Information Commissioners Office. The ICO is the UK's independent body set up to uphold information rights.   JISC is the UK digital, data and technology agency focused on tertiary education, research, and innovation. This policy has been developed with reference to their code of practice for learning analytics.

1. Purpose

1.1. ICMP is fully committed to enabling all our students to thrive and to enable their learning journey during their programme of study.

1.2. This policy details ICMP'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.

1.3. Implementing the use of learning analytics at ICMP is designed to assist our students to understand the implications of their level of engagement and support them to access the right support 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. This will enable us to respond effectively, assess the impact of our interventions and activities and deliver proactive improvements to our services. 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 in meeting their learning aspirations.

1.4. This policy covers uses of learning analytics as part of the suite of dashboards used by staff at ICMP.

1.5. This policy document is designed to complement the ICMP'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 UK Data Protection Legislation.

2. Definitions

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)
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.
Engagement data	Engagement data refers to data that can be used to measure a student's engagement/interactions with their learning. It provides a digital activity footprint of learning engagement interactions which serve as a proxy for student engagement
Data sources	The data sources used as part of learner analytics. At ICMP, this will include: the virtual learning environment (VLE), engagement and assessment activity together with attendance data from CELCAT and Paxton and learning resources data including equipment borrowing and room booking from SISO. It also draws data from the student records contained within our Student Records System (Quercus).
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.
Privacy Notice	A document given by an organisation to an individual setting out the purposes for which their personal data is collected and processed. ICMP's is the Student Information Privacy Notice
Interventions	Effective use of learning analytics enables ICMP to proactively communicate, engage with and offer appropriate support 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
VLE	ICMP's Virtual Learning Environment, Canvas
Quercus	ICMP's student record system
SLC	Student Loan Company
CELCAT	ICMP's timetabling and attendance monitoring system
Paxton	ICMP's door entry monitoring system
SISO	ICMP's equipment and room booking system
UKVI	UK Visa and Immigration department

3. Introduction

3.1. ICMP will use learning analytics to help meet the following objectives:

3.1.1. supporting student engagement,

3.1.2. increasing student retention and progression,

3.1.3. improving attainment and better supporting students throughout their student journey.

3.2. ICMP 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. A key driver has been to improve student support by enabling proactive, meaningful, timely and targeted student engagement and interventions.

3.3. Learning analytics data also enables ICMP to comply with its statutory reporting requirements such as monitoring the attendance of sponsored students under ICMP's UKVI license.

3.4. All activities in this area will comply with ICMP'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 Information Privacy Notice.

4. Scope

4.1. 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 ICMP's capability to put in place early intervention measures to help student progression and attainment.

4.2. Students on short courses and non-accredited provision are outside of the scope of this policy.

5. Principles

5.1. This policy defines a set of principles to govern ICMP's approach to learning analytics, and to therefore ensure that it is applied ethically for the benefit of students. The following principles apply

5.1.1. The purpose of, and, the use of student data and analytics, is clear, transparent and accessible to staff and students

5.1.2. The use of student data and analytics is carried out in compliance with Data Protection Legislation

5.1.3. That 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 ICMP.

5.1.4. That ICMP will ensure the quality, robustness and validity of the data and analytics processes by actively managing and monitoring it.

5.1.5. That ICMP will work 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.

5.1.6. That the effective application of learner interventions and resources is designed to check in and offer timely, proactive support and assistance to our students.

5.1.7. That data should be interpreted in as full a context as possible, with recognition that learning analytics data does not give a complete picture of a student's learning.

5.1.8. That learning analytics data or insights from learning analytics will not be used by ICMP for any purposes beyond those set out in this policy.

6. Transparency and Student Access to Data

6.1. The ICMP Student Information Privacy Notice refers to the ICMP's use of student data in learning analytics activities.

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

6.3. 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.

6.4. 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.

7. **Compliance with Data Protection legislation**

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

7.2. ICMP considers that the legal basis for processing personal data as part of the learning analytics are:

7.2.1. the processing is necessary for the performance of a contract (i.e. ICMP's Study Terms and Conditions);

7.2.2. the processing is necessary for the performance of a task carried out in the public interest.

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

7.3.1. Students will be explicitly informed about how their data will be processed as part of the Student Information Privacy notice, ICMP's terms and conditions and through student guides and briefings to ensure that they are fully aware of the use of learning analytics by ICMP

7.3.2. Personal data captured in the underlying databases that generate data for learning analytics will be accurate and kept up to date; and,

7.3.3. Personal data captured for the purposes of learning analytics will not be excessive

7.3.4. ICMP will take technical and organisational measures to protect the personal data used in learning analytics.

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

7.5. The data for learning analytics comes from a variety of sources, including student record data recorded in Quercus and engagement data logged through Celcat, Canvas, Paxton and SISO. The Student Guide to Learning Analytics will clearly specify:

7.5.1. The data sources being used for learning analytics

7.5.2. The specific purposes for which learning analytics is being used

7.5.3. The metrics used, and how the analytics are produced

7.5.4. Who has access to the analytics, and why

7.5.5. Guidance on how students can interpret any analytics provided to them

7.5.6. The interventions that may be taken on the basis of the analytics

7.6. 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.

7.7. All the learner data collected, analysed and visualised for learning analytics will be in compliance with ICMP policy and the wider legal requirements.

8. Responsible, Confidential and Appropriate Use

8.1. 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 ICMP 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:

8.1.1. ICMP staff members who require the data to support students in their professional capacity

8.1.2. Third parties which are processing learning analytics data on behalf of the institution. In such circumstances ICMP will put in place contractual arrangements to ensure that the data is held securely and in compliance with the Data Protection Legislation.

8.1.3. Other individuals or organisations to whom the student gives specific consent.

8.1.4. ICMP IT staff will have access to systems and data in order to maintain systems rather than to access any individual's data.

8.2. Where data is to be used anonymously particular care will be taken by ICMP to avoid:

8.2.1. Identification of individuals from metadata

8.2.2. Re-identification of individuals by aggregating multiple data sources

8.3. Learning analytics 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.

8.4. The Learning Analytics dashboard enables appropriate referrals to key ICMP services to enable timely and proactive advice and guidance to be offered to students.

8.5. ICMP 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 UKVI guidance.

8.6. Reviewing and acting upon any aggregated / anonymised data trends may also form part of ICMPs quality assurance process as part of our approach to supporting quality enhancements.

9. Data Management

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

9.1.1.   Inaccuracies in the data are understood and minimised.

9.1.2.   The implications of incomplete datasets are understood.

9.1.3.   The optimum range of data sources is selected.

9.1.4.   Spurious correlations and conclusions are avoided.

9.1.5.   The algorithms and metrics used for predictive analytics and interventions are understood, validated, reviewed and improved as appropriate.

9.2. ICMP will also ensure that the data and learning analytics are seen in its wider context and combined with other data and approaches as appropriate. ICMP 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.

9.3. Students will retain autonomy in decision making relating to their learning; the analytics are provided to help inform decisions about how to engage in and manage their learning.

10. Working in partnership

10.1.   ICMP is committed to working in partnership with staff and students as part of the effective implementation and ongoing development of learning analytics. Listening and responding to feedback will enable us to tailor our approach to learning analytics appropriately.

11. Interventions

11.1.   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.

11.2.   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.

11.3.   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 ICMP (or elsewhere), if any, would be of benefit.

11.4.   Interventions will normally be recorded and will follow ICMP's Data Protection Policy and other relevant policies, processes and protocols.

12. Student data

12.1.   This student data sources that are currently in and out of scope of learning analytics platform are documented in the Student Guide to Learning Analytics

12.2.   Student academic performance (provisional and confirmed assessment results will not form part of the data used.

12.3.   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 ICMP plan its provision of services to meet the needs of our student body.

13. Data Processing and Retention

13.1.   Personal data collected for learning analytics activities will only be kept for as long as necessary for the purposes of that processing, in line with the GDPR.

13.2.   General guidance on records retention and the online Information Asset Register are available on my.ICMP.

14. Oversight and responsibilty

14.1.   Oversight of this policy lies with Information Governance Group

14.2.   **T**he positions identified here are the senior roles with responsibility for ensuring that learning analytics is managed effectively and that the overall aims and objectives are met. We recognise that the staff using the system and taking action are individual educators and tutors supported by staff in relevant professional services roles.

14.3.   Overall responsibility for Learning` Analytics at ICMP is held by the ***Associate Dean for Student Engagement.***

14.4.   Oversight for relevant areas of activity is allocated as follows:

Action	Responsibility
Specifying the collection of data to be used for Learning Analytic	Associate Dean for Student Engagement.
Arranging automated upload of datasets into the data repository and ensuring data security	IT Manager
The anonymisation and de-identification of data where appropriate	Head of Student Records, Data, and Systems
The analytics processes to be performed on the data, and their purposes	Associate Dean for Student Engagement.
The interventions to be carried out	Associate Dean for Student Engagement.

The retention and stewardship of data used for and generated by learning analytics	Head of Student Records, Data, and Systems
Implementation of Learning Analytics transparently including feedback of personalised analytics information to student	Associate Dean for Student Engagement.