

Model Institutional Learning Analytics Policy¹

Introduction

1. The collection and use of data about students and their learning are providing new opportunities for institutions to support learners and to enhance educational processes. Learning analytics systems present visualisations of student learning activity and provide predictions of attainment. These will be used at *[institution]* to assist current students in achieving their study goals, and to help us improve our overall provision of education.
2. The institution will use learning analytics to help meet the following strategic objectives: *[e.g. increasing retention and progression, improving attainment]*. These are key elements of the *[Learning and Teaching Strategy / other relevant strategies]*.
3. The *[University]* will ensure that learning analytics are deployed for the benefit of students, with complete transparency about the data that are being captured, processed and used. All activities in this area will comply with the institution's Data Protection Policy/Governance *[link]* to ensure compliance with the South African Protection of Personal Information Act (2013)².

Responsibility

4. Overall responsibility for learning analytics at *[University/College]* is held by *[senior leader responsible for learning analytics]*. Responsibility for relevant areas of activity is allocated as follows:
 - The collection of data to be used for learning analytics - *[e.g. IT Director, head of Institutional Research, those responsible for learning management system, those responsible for the student information system]*
 - The anonymisation or de-identification of data where appropriate - *[e.g. IT Director]*
 - The analytics processes to be performed on the data and their purposes – *[e.g. DVC Learning & Teaching]*
 - The interventions to be carried out on the basis of the analytics – *[e.g. DVC Learning & Teaching]*
 - The retention and stewardship of data used for and generated by learning analytics – *[e.g. Registrar]*
5. Analytics reports or dashboards 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.

Transparency and consent

¹ Sclater, N. 2016. <https://analytics.jiscinvolve.org/wp/files/2016/11/Jisc-Model-Institutional-Learning-Analytics-Policy-v0.1.pdf>

² Government of South Africa. (2013). Protection of personal information Act. Government Gazette, 26 November 2013. <http://www.justice.gov.za/legislation/acts/2013-004.pdf>

6. Students are informed about how their data will be processed when they agree to the [e.g. *data processing consent notice / computing regulations*] upon registration. Any research project requiring students to share data other than that already on university systems will require them to sign an informed consent form (e.g. additional surveys, focus group interviews) Data will be collected for learning analytics in compliance with [these documents].
7. The data for learning analytics come from a variety of sources, including the student record system and the institutional learning management system [insert name]. 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 reports or dashboards are produced
 - Who has access to the analytics, and why
 - Guidance on how students can interpret any analysis provided to them
 - The interventions that may be taken on the basis of the analytics
8. Students will be asked for their consent for any automated prompts or suggestions to be sent to them, based on the analytics. These may include emails, SMS messages or app notifications.

Confidentiality

9. 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 data on behalf of the institution. In such circumstances the [University] will put in place contractual arrangements to ensure that the data are held securely and in compliance with the POPI Act.
 - Other individuals or organisations to whom the student gives specific consent (e.g. through a signed contract with a donor organisation funding the student's studies)
10. [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.

Validity

11. 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:
 - Inaccuracies and gaps in the data are understood and minimised
 - The optimum range of data sources to achieve accurate predictions is selected
 - Spurious correlations and conclusions are avoided
 - The algorithms and metrics used for predictive analytics and interventions are valid
 - Learning analytics is seen in its wider context and is combined with other data and approaches as appropriate

- Data are used in a way that students perceive as being fair to them.

Student access to personal data

12. 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 obligation to correct any inaccurate personal data held about themselves.
13. Students will also be able to view any metrics derived from their data and any labels attached to them.
14. On occasion, it may be considered that access to the analytics reports may have a negative impact on the student's academic progress or wellbeing. In these cases, they may be withheld from the student. However, if the student requests them, all their personal data and analytics reports will be made available to them.

Interventions

15. A range of interventions may take place with students. The types of intervention and what they are intended to achieve are documented in the Student Guide to Learning Analytics [[link](#)]. These may include:
 - Prompts or suggestions sent automatically to the student via email, SMS message or mobile app notification (subject to the student's consent)
 - Staff contacting an individual on the basis of the analytics report if it is considered that the student may benefit from additional support
16. Interventions, whether automated or human-mediated, will normally be recorded. The records will be subject to periodic reviews as to their appropriateness and effectiveness.

Minimising adverse impacts

17. The [*University*] recognises that learning analytics cannot present a complete picture of a student's learning and that predictions may not always be accurate.
18. Students will retain autonomy in decision making relating to their learning; the analytics report or dashboards are provided to help inform their own decisions about how and what to learn.