

 S P Jain London School of Management	Learning Analytics Policy
Document Type	Policy
Administering Entity	Chief Operating Officer, Dean, IT Support Manager
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1. Purpose

- a. The SP Jain London School of Management (the School) is committed to supporting all our students to thrive and to enable their learning journey during their programme of study and to provide appropriate support for their success and wellbeing.
- b. This policy details the School's approach to transforming our students' learning experiences and helping them achieve their learning goals through the data collection, and application of learning analytics and the legal and ethical safeguards in place
- c. The School will use learning analytics to help meet the objectives of supporting student engagement, increasing student retention and progression, improving attainment and better supporting students throughout their academic journey.
- d. Implementing learning analytics 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 at the right time, to achieve better outcomes. It will also help the School understand when, where and how students engage – or do not engage - with their studies and wider learning experiences, enabling effective responses, to assess the impact of our interventions and activities and deliver proactive improvements to our services to better support student success.
- e. This policy document is designed to complement the School's Academic Regulations and 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

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)
Engagement	Engagement is defined as participation in 'academically purposeful activity'
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. 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.

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.
Data Sources	The data sources used as part of learner analytics. 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 Information System and the Library System.
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.
Interventions	Effective use of learning analytics enables the School 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.

3. Scope

- a. 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 School's capability to put in place early intervention measures to help student progression and attainment.

4. Principles

- a. This following set of principles govern and inform the School's approach to learning analytics and ensure that this is applied ethically for the benefit of students:
- Purpose of, and, the use of student data and analytics, is clear, transparent and accessible to staff and students
 - Use of student data and analytics is carried out in compliance with Data Protection Legislation
 - 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 School.
 - Ensuring the quality, robustness and validity of the data and analytics processes will be actively managed and monitored by the School
 - 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.
 - 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. Transparency and Accessibility

- a. 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.
- b. 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.
- c. 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 student information system.

6. Compliance with Data Protection Legislation

- a. The use of learning analytics at the School will be carried out in compliance with Data Protection Legislation, and following the School's Data Protection Policy. 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 School's Student Terms and Conditions);
 - the processing is necessary for the performance of a task carried out in the public interest.
- b. The processing of personal data as part of the learning analytics will be in accordance with the Data Protection Principles set out in the School'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 School'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 School
- 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 School will take technical and organisational measures to protect the personal data captured in the learning analytics.
- c. Students will not be able to opt-out of learning analytics as a whole but the School has limited the use of sensitive or special category personal data as part of the learning analytics dataset.
- d. The data for learning analytics comes from a variety of sources, including attendance data logged through the student information system, the virtual learning environment and use of learning resources. The Student Handbook 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
- e. Students will, however, 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.
- f. All the learner data collected, analysed and visualised for learning analytics will be in compliance with these documents and the legal requirements.

7 Responsible, Confidential and Appropriate Use

- a. 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 School 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
 - School staff members who require the data to support students in their professional capacity
 - Other individuals or organisations to whom the student gives specific consent School 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.
- b. Where data is to be used anonymously particular care will be taken by the School to avoid:
- Identification of individuals from metadata
 - Re-identification of individuals by aggregating multiple data sources.
- c. Learning analytics will be used for students' benefit and for the School 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 learning analytics. The data will be primarily used to offer services and early interventions by the Student Experience team, by Student Services teams and by those providing academic advice to students.

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

8 Quality, Validity and Stewardship of data

- a. Ensuring the quality, robustness and validity of the data and analytics processes will be actively managed and monitored by the School, 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.
- b. SPJUK 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 School 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.
- c. 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.

9 Working in partnership by engaging with students and staff

- a. The School 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 School tailors its communication approaches and student engagement and retention interventions appropriately for maximum benefit to our students.

10 Learner Interventions and resources

- a. 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 Handbook. These may include:
 - Prompts sent automatically to the student from the SIS via email, SMS message or mobile app notification 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 services

e.g. Student Wellbeing Services, Welfare or Academic support 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.

- b. 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.
- c. The purpose of these interventions will be to reach out as early as possible to students to check in with them about their studies.
- d. Interventions, whether automated or initiated by members of staff, will normally be recorded and will follow the School's Data Protection Policy and other relevant School policies, processes and protocols.

11 Student Data

- a. This outlines the student data sources that are currently in and out of scope of the School's learning analytics policy as part of ensuring that these are clearly communicated to all staff and students.
 - Attendance data recorded for centrally timetabled learning and teaching activity
 - Usage and activity data from the School's virtual learning environment (VLE) platform
 - Assessment activity data captured through the VLE
 - Assessment results
- b. Where possible, usage and activity data from the School's electronic resources systems will be used.
- c. Data relating to students disability or finances (ethnicity?) will not be used.
- d. 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 School plan its provision of services to meet the needs of our student body.

12 Responsibilities

- a. The Dean and Chief Operating Officer have shared overall responsibility and accountability for the effective use of learning analytics at the School.
- b. Areas of responsibility for all activities related to learning analytics will be clearly defined and assigned to relevant teams and departments.
- c. 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.

13 Acknowledgements

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

14 Related Policies and Procedures:

Access and Participation Plan

Attendance and Engagement Policy

Data Protection Policy

Privacy Notice for Students

Student Equity and Fair Treatment Policy