



# Developing Learning Analytics Policies to Support Student Success

Student success has become a key policy priority of higher education at both national and institutional levels. Learning analytics is gaining recognition as a resource that can support institutions in meeting the objectives of their own strategies and those of national importance such as the Higher Education System Performance Framework and the National Access Plan. This *Forum Insight* highlights some helpful considerations for policymakers in higher education institutions (HEIs) to reflect upon as they develop learning analytics policies to underpin institutional strategies for student success.

## Introduction

This Insight draws on the National Forum's Guide to Developing Enabling Policies for Digital Teaching and Learning, which details steps for developing implementable institutional policies that are situated in practice and reflective of the HEI's priorities (National Forum, 2018). The policy guide outlines key reflective questions and showcases exemplars to help inform the development of policies relating to digital teaching and learning. This Insight applies the same format to the development of learning analytics policies, by focusing on the key aspects of Principles and Privacy, Data as Evidence, and Informing Effective Action.

## Principles and Privacy

Data-supported approaches to student success give HEIs a significant opportunity to strengthen their engagement and partnership with students. However, any approach that does not fully respect students' autonomy and privacy risks alienating students and damaging trust. Likewise, policies that are not sensitive to the needs and concerns of staff risk negative effects. Further, HEIs must ensure that any use of student data is fully compliant with data protection legislation.

## Key Questions

1. What are the principles and values that will underpin the HEI's use of learner data?
2. Are these principles aligned with the institutional strategy and ethos and national priorities such as the Higher Education System Performance Framework, the National Access Plan and the Action Plan for Education?
3. How has the HEI ensured that its approach will not compromise the trust and mutual respect that are fundamental to its relationships with both students and staff?
4. Has the HEI taken all necessary steps to ensure that the privacy and security of student data are respected, in full compliance with data protection legislation?

## Examples of institutional learning analytics principles

1. As an institution we understand that data never provides the whole picture about students' capacities or likelihood of success, and it will therefore not be used to inform significant action at an individual level without human intervention.
2. Our vision is that learning analytics can benefit all students in reaching their full academic potential. While we recognise that some of the insights from learning analytics may be directed more at some students than others, we do not propose a deficit model targeted only at supporting students at risk of failure.
3. We will be transparent about how we collect and use data, with whom we share it, where consent applies, and where responsibilities for the ethical use of data lie.
4. We recognise that data and algorithms can contain and perpetuate bias, and will actively work to recognise and minimise any potential negative impacts.
5. Good governance will be core to our approach, to ensure learning analytics projects and implementations are conducted according to defined ethical principles and align with organisational strategy, policy and values.
6. The introduction of learning analytics systems will be supported by focused staff and student development activities to build our institutional capacity.
7. Data generated from learning analytics will not be used to monitor staff performance, unless specifically authorised following additional consultation.

*From University of Edinburgh Learning Analytics Principles and Purposes*

**See also: Open University Policy on Ethical Use of Student Data for Learning Analytics**

## Data as Evidence

'Good' data is the foundation of all data-enabled student success initiatives. Policymakers will need to work closely with data custodians and modellers to ensure that they use data sources that are accurate, up-to-date, dynamic, GDPR-compliant, readily available, and meaningful. They should also endeavour to ensure that, as far as possible, their analytical approach is free from assumptions and bias.

## Key Questions

1. How will the HEI ensure that data sources and methods are accurate, appropriate and reflective of reality?
2. How has the HEI displayed its commitment to a rigorous analytical method?



### Example of commitment to ensure rigour and to recognise the limits of a data-informed approach

It is essential that learning analytics is underpinned by a rigorous, scientific approach to modelling and intervention. The Institute will ensure that the limitations and potential biases in the data are understood, and the impacts of bias in the data are minimised (...) Where results of a learning analytics model identify students that may benefit from secondary course intervention measures, the action arising from that model will be sensitive to the student needs and acted on in a responsible manner. Analysis of data will never result in a significant action without human intervention.

From TU Dublin Blanchardstown Campus Learning Analytics Policy and Strategy

**See also: JISC Code of Practice for Learning Analytics**

### Informing Effective Action

Learner data provides a rich and potentially valuable resource for identifying students who may benefit from targeted supports. Merely identifying those students, however, is not enough to drive change. Impact lies in what institutions do with the insights their data can provide. To this end, an effective strategic approach must explore what specific actions the institution will take to support students once their needs have been identified.

#### Key Questions

1. What are the appropriate trigger points for targeted interventions?
2. Who will be responsible for intervening with at-risk students?
3. What form will interventions take?
4. What form will follow-up interventions take?

### Example of a strategy that details intervention format, escalation route and responsibilities by role

Implications of Non-attendance or Participation:

- a) If a student is not engaging, the tutor informs the Student Support Officer, who following liaison with the Director of Programmes then follows up with the student. Contact will in the first instance be initiated through email but this will be followed up with a phone call if the student fails to respond within five working days.
- b) Where there is no improvement following Student Support Officer contact or in the instance of a student missing more than two consecutive on-sites, demonstrating a pattern of absence across the programme, logging in to tutorials but failing to engage or demonstrating non-participation in asynchronous tutorials, the Director of Programmes is required to contact the student concerned to ensure continued intention to complete the programme and establish if there are any circumstances the College needs to be aware of that are impacting the student's attendance and participation.
- c) Where a review of the student's attendance and participation is of concern, the Director of Programmes can seek further information from the Assessment and Awards

- Manager in relation to assessment submission deadlines and performance to establish if there is cause for concern.
- d) The student can be asked to attend a meeting to discuss the implications of their non-attendance or non-participation.

From Hibernia College Student Engagement Monitoring Procedure

**See also: Charles Sturt University Learning Analytics Strategy**

### A Note on the General Data Protection Regulation (GDPR)

Given the need to comply with concepts such as data protection by design and by default, it is essential that institutions work, from the planning stage, with their Data Protection Officers (or those in equivalent roles) to ensure full compliance with the GDPR. Concepts such as these and the data principles detailed in the GDPR are critical to the successful and legal development of any policy that deals with personal data and must be considered a key and constant thread through any such policies, strategies, procedures and IT developments.

HEIs are also advised to consider whether there is a need to conduct Data Privacy Impact Assessments (DPIAs) for new data projects before any data processing occurs.

Further information on the GDPR and on compiling DPIAs is available from the Data Protection Commissioner's website at [www.gdprandyou.ie](http://www.gdprandyou.ie)

### References

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