Student Engagement Data Use Policy

Introduction

Support for student welfare and academic success is at the heart of our collection and use of student engagement data at the University of Nottingham UK. Engagement data refers to information from University learning systems which may indicate attendance at online teaching sessions, and participation in learning within Moodle and supporting systems. Such data can provide valuable insights into how students are engaging with the University and their studies, which in turn can act as an important indicator of wellbeing.

We know that it can be difficult to ask for help. Our students tell us that they want us to notice and act more quickly if they begin to struggle. The goal of student engagement analytics is to ensure that we are better able to identify where students may need guidance, reassurance, academic, pastoral or specialist service support in order to get the most out of their time at the university. It also enables us to meet our Student Visa sponsor obligations to UK Visas and Immigration.

We do this by drawing together a small selection of engagement indicators from online learning systems into a Student Engagement Dashboard, which enables key staff involved in student teaching and support to identify students who may be experiencing low engagement with their studies. This document details what data is collected and how it will be used, and is based on the JISC Code of Practice for Learning Analytics https://www.jisc.ac.uk/guides/code-of-practice-for-learning-analytics

Data Sources

The Student Engagement Dashboard sources data from:
- Campus Solutions: the student records system
- Moodle: the virtual learning environment
- Microsoft Teams: the online teaching platform
- Echo360: the multimedia platform for recorded learning content

What we measure

Student engagement measures a small selection of student interactions with online learning systems in order to provide possible indicators of low engagement:

- The last date and time that each of the source systems was accessed
- Activity within Moodle measured by participating clicks since start of session 2020
- The number and details of Moodle assignments expected and submitted
- The number of scheduled Teams meetings attended since start of session 2020
- The number of video recordings accessed on the Echo360 multimedia platform
- Average anonymised engagement patterns for each cohort

We recognise that there are many other activities both on and offline which are an important part of engagement and which are not included in these engagement measures. It is important that engagement measures are therefore contextualised with reference to wider knowledge of each student, and expectations for their programme of study.

The five principals of student engagement analytics

1 The focus of the Student Engagement Dashboard is student welfare and support

The primary goal of the Student Engagement Dashboard is to help teaching and student support staff offer more timely and effective help and advice to our students. This information can help us identify which students may be finding university life difficult, and supports our work putting students at the centre of everything we do.

2 Engagement data will be treated with care and sensitivity

We know that this is sensitive information. We only collect engagement data from named university systems, and only staff directly involved in teaching and supporting students will have access to that information. For our international students with sponsored Student Visa's this data will also be available to our Visa and Immigration team. All staff with access to student engagement data will be trained in how to use and interpret it appropriately in line with the Data Use Policy and data protection guidelines.

3 No decision should be made on the basis of engagement data alone

We know that data cannot tell us everything about our students. The data we collect is simply used to indicate where teaching or welfare staff may want to investigate whether a student may need additional support. Through the provision of data on online engagement, we aim to increase the information available to appropriately trained tutors and support staff when they have conversations with students, or help them identify students who may need to be contacted proactively. No definitive conclusions should be drawn from the small selection of engagement indicators provided

within the Student Engagement dashboard, and additional context from other university systems, from in-person teaching, and from the student, should be referenced to provide relevant information.

4 Every student is an individual with their own preferred study patterns and levels of engagement, and ultimate responsibility for their own learning

Engagement data is used to inform and support decision making as part of a holistic view of the individual student, and should always be interpreted in context, with the assistance of staff who have the best knowledge of that student and their progress. Every student is an individual with responsibility for their own engagement with their studies, and students may choose to study in different ways. Individual circumstances and study habits should always be considered in any contact with a student regarding engagement.

5 The Student Engagement Dashboard should not form the basis of any assessment

The Dashboard should not be used as the basis for any student assessment. Engagement patterns and levels may vary according to the individual programme of study and the Dashboard itself does not make any decisions or judgements about engagement. Where a student has a contractual agreement with a third-party regarding attendance and engagement, for example UK Visas and Immigration (UKVI), engagement data may form part of the overall evaluation of the student's compliance with that agreement. All UK Universities have the same legal obligation to ensure that students are complying with the terms of their sponsored Visa.

Data Protection

All engagement data must be processed in line with UK General Data Protection Regulation (GDPR). You can find out more at:
https://uniofnottm.sharepoint.com/sites/InformationSecurityandCompliance

Responsibility

Overall responsibility for student engagement data at the University of Nottingham is held by the Teaching and Learning Committee led by sponsor and APVC for Teaching and Learning, Professor Mark Bradley. Responsibility for specific aspects of engagement data is held as follows:

6.1 The collection of data

Data is taken from university systems managed by Digital Technology and Services (DTS). Provision of access to that data is the responsibility of Digital Technology and Services. Engagement data is processed and delivered by Planning Performance and Strategic Change

(PPSC). Responsibility for the quality and accuracy of the source student data lies with Student Services.

6.2 The analytics processes and purposes

Processes for the application and use of student engagement data within the university, including training and guidance for staff, is led by the Student Engagement Board, chaired by Professor Mark Bradley.

6.3 Interventions as a result of the data

Where a need for contact or intervention is suggested by engagement data, such contact may be made by appropriate academic and/or support staff. Overall responsibility for appropriate use of engagement data lies with the Student Engagement Board, chaired by Professor Mark Bradley.

6.4 Stewardship of Engagement Data

Stewardship of student engagement data is the responsibility of Planning Performance and Strategic Change (PPSC).

6.5 Retention of Engagement Data

Student Engagement data will be recorded and retained for the duration of a student's studies with the University, and may be retained for 6 years following departure from the University.

Scope of data

Student Engagement processes existing data within university systems, such as details of assignment submissions, online teaching attendance, and frequency and levels of activity within the virtual learning environment, and brings this information together within a single interface. All details of students and their programmes of study are derived from Campus Solutions. No new data is created.

No special category data relating to ethnicity, gender or other protected characteristic is held or reported on as part of Student Engagement.

Data Validation

Student Engagement compiles and displays data from source systems (see Data sources). If data about a student appears to be incorrect it should be cross-checked in the source system. The quality and accuracy of student data held within Campus Solutions is validated by the Faculty of Registrars. Errors in a student record should be notified to Student Services.

The accuracy of the processing and presentation of engagement data is validated by Planning Performance and Strategic Change. If a member of staff believes that the engagement

data shown for a student is incorrect, details should be supplied to engagement@nottingham.ac.uk for investigation.

If a student believes that the data held about them is incorrect, they should contact their Senior Tutor to report their concern. Details should be supplied to PPSC at engagement@nottingham.ac.uk for investigation.

Transparency

We publish full details about how student data is processed and used to support the provision of university services including academic programmes and related services, such as welfare support. This information can be found in the University Privacy Notice which is shared when students enrol and is available to view on the University website:

https://www.nottingham.ac.uk/utilities/privacy/privacy-information-for-students-and-applicants.aspx

Updates to the Privacy Notice will be communicated as necessary to support our commitment to openness and transparency. The Privacy Notice contains details of the purpose and legal basis for the collation and use of student engagement data.

Consent

Student engagement data will be collected and analysed in compliance with the University's Data Protection Policies, and according to the terms outlined within this Data Use Policy. The use of data in this way is based on the principal of legitimate interest, and supports our duty of care to students, which arises from the University's contract with students. Low engagement may indicate a need for support and the use of data to help identify such students ensures that appropriate interventions can be considered and offered if necessary. Where students are studying under a Sponsored Visa the University has a legal obligation to confirm attendance and engagement for the UKVI.

For this reason, it is not possible for students to opt out of the collection of student engagement data. It should be noted that all data used for the purposes of indicating engagement is already held within existing university systems to support teaching and learning. It is not possible, for example, for a student to opt out of records on assignment submissions held within Moodle as these records are an essential component of academic supervision.

Privacy

In compliance with the university's Data Protection Policy only staff directly involved in teaching and supporting students will have access to engagement data. Access will be controlled using secure login to the Student Engagement Dashboard. A student's engagement data will only be accessible

to teaching and administrative staff for the administering school, by appropriate Student Services staff, and by Support and Wellbeing staff. Student engagement data will not be disclosed to parents, guardians or other third parties except in the following special circumstances:

UKVI Student Visa requirement

UK Visa and Immigration (UKVI) regulations mean that Student Visa holders are required to engage with their studies as a condition of their Visa. The University, as an immigration sponsor, also has statutory responsibilities to adhere to, as set out by UKVI. Evidence of attendance and engagement may be supplied to UKVI on request and failure to engage for a sustained period may invoke a statutory obligation to report absence to UKVI. Full details of visa conditions can be found here: https://www.nottingham.ac.uk/studywithus/international-applicants/visa-help/visas/visa-conditions.aspx

Exceptional circumstances

Exceptional welfare circumstances where there is a threat to life may necessitate sharing of engagement details with responsible parties, including parents or guardians. In the event that a student passes away during their time at the University, student engagement details may be provided on request to the Coroner to support their investigation.

Access

Students have a right to view the data that is held about them, and student engagement details will be provided in portable electronic format on request.

Students can request a PDF copy of their data directly by contacting engagement@nottingham.ac.uk. Students should allow 2 weeks for their request to be processed. A copy will be sent to the student's Personal Tutor for information.

In exceptional circumstances where the provision of student engagement details may be in conflict with the university's duty of care and may negatively affect a student's wellbeing, this information may be provided in person via the Senior Tutor or Personal Tutor, rather than directly to the student, to ensure that context and support can be provided.

Permitted use and positive interventions

Student contact by an appropriate representative of the School, Department, Student Services, Support and Wellbeing team or Visa and Immigration team may be initiated if student engagement data indicates that a student:

- Appears to have disengaged from their studies without known cause for more than 14 consecutive days. In some cases, contact may be attempted before this threshold if the

school considers that in the context of the programme of study a worrying duration of disengagement has occurred.

- Appears to be struggling with persistent or repeated periods of low engagement which may be indicative of a need for personal or academic support.

- Appears to have recently experienced a sudden and significant drop in engagement which may indicate a new need for personal or academic support.

- Is studying on a sponsored Student Visa and appears to have low engagement which may indicate a need for personal or academic support, or indicate that they may not be meeting the conditions of their Visa.

Interventions should always take the form of an initial supportive enquiry, usually via email. Where a student has completely disengaged and there is no response to repeated attempts to make contact, the university's duty of care necessitates that further steps be taken to establish contact. This may include phone calls and liaison between senior School or Department staff and Student Welfare within Campus Life. Information on specialist and mental health support services provided by the University can be found here: https://www.nottingham.ac.uk/studentservices/healthwelfare/mental-health.aspx

Any access for purposes other than those specified

No access to, or use of, student engagement data is permitted for any purpose other than those specified within this policy. Any request for access by users or user groups other than those defined, or for any purpose other than those defined, will require completion of the Data Protection Impact Assessment Screening Questions form at https://forms.office.com/r/pia08e7spg. A member of the Information Compliance Team will respond accordingly, and such requests will be assessed by the Student Engagement Board.