Code of practice for Student Learning Analytics

Academic year 2026/27

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Introduction and scope

1. For the purposes of this *Code of practice,* Learning Analytics is defined as follows: "The measurement, collection, analysis, and reporting of data about learners and their contexts, for the purposes of understanding and optimising learning and the environments in which it occurs."[1]

2. The University has adopted this definition for the purposes of this *Code of practice* and the learning engagement of its students. The principles for student engagement are outlined in *C7: Attendance and Engagement Procedure*.

3. Learning Analytics provides data on the engagement of students with their studies. The data is presented through dashboards that enable the student to see a trend of their engagement and make comparisons with the rest of the student cohort, if desired.

4. This *Code* aims to ensure that we are transparent about our use of Learning Analytics so that students understand what data is being collected, how it is being processed and what we will be doing with the information. This document provides these details and will be updated as our use of Learning Analytics develops.

Principles

5. This *Code of practice* is informed by the following principles:

(i) Learning Analytics will be used to support student learning, engagement, and wellbeing.
(ii) Learning Analytics will be used according to defined guidelines as outlined in this *Code* and in accordance with our wider regulatory frameworks (Quality Framework: https://www.surrey.ac.uk/quality-framework and Policies (POPP): https://www.surrey.ac.uk/about/policies-and-procedures).
(iii) The University will collect Learning Analytics data transparently and ethically, and ensure that where data is shared, it is clear with whom the data will be shared and why.
(iv) The University will communicate widely and regularly with students and staff about the use of Learning Analytics.
(v) The University will use Learning Analytics data to improve its processes and practices, in consultation with and for the benefit of staff and students.
(vi) The University will use predictive analytics transparently, to ensure that the full spread of student behaviour and capability are recognised.
(vii) The University will actively work to recognise and minimise potential for bias when processing Learning Analytics data, and will endeavour to minimise possible negative impacts, focussing on individuals and their circumstances.
(viii) The University will regularly monitor and quality assure the use of Learning Analytics to make certain it is meeting the objectives of the wider University strategies for education.
(ix) Learning Analytics data will enable staff to have conversations with students about their individual progress and support needs (see Appendix 1).
(x) The University will provide on-going training and support for staff and students in the appropriate use of Learning Analytics data.

[1] *See LAK '11: Proceedings of the 1st International Conference on Learning Analytics and Knowledge, Alberta, Canada,* 2011. Association for Computing Machinery, New York, NY, United States.

6. Data generated from Learning Analytics will not be used by the University to initiate investigations into staff performance.

7. Students and members of staff have the right to use data generated from Learning Analytics as part of Student Regulations and Student Procedures and in accordance with the University Confidentiality and General Data Protection Regulations. The University deals with academic appeals and complaint procedures in confidence, to the extent that this is compatible with making enquiries and holding meetings to consider the matter. The University collects and processes a variety of personal data in order to fulfil relevant student regulations (see the Regulations web page for a list of all Student Regulations). This personal data may be provided by the student or collected from other departments within the University. The University processes personal data for this purpose in its legitimate interests. Some Regulations will require the sharing of sensitive personal data (defined as "special category" data by data protection legislation). The University processes and shares special category data in the substantial public interest and only where it is necessary to enable the University to fulfil its duties of care to the student, other students, or to safeguard third parties. More detail on the types of data collected and how it is used to meet this need can be found in the *Student Regulations Privacy Notice*.

Objectives

8. The objectives for the use of Learning Analytics at the University of Surrey are:

- To provide access to Learning Analytics data for individual students and relevant staff that demonstrates their learning progress, to:
  - support student engagement, academic outcomes, and wellbeing.
  - monitor engagement to meet the legal and regulatory requirements of the University in regard to UKVI visa compliance, and other government and professional bodies.
- To do this in a manner consistent with good data ownership and management.
- To provide information to the University about the level of engagement of individual students to inform appropriate decision making where specific requirements for engagement are present.
- To enable the University to provide students with optional opportunities to engage with initiatives and interactions that are offered to support engagement, academic outcomes, and wellbeing.
- To develop a programme of research and evaluation to measure the impact and effectiveness of Learning Analytics to enhance student learning and student support.
- To integrate Learning Analytics data with business intelligence and data analytics processes, to provide aggregated information for decision-makers and external reporting purposes.

Data Sources for Learning Analytics

9. The University collects the types of data listed below in relation to student administration and education; the sources listed may be used for Learning Analytics, based on the functionality of the system(s) in use at the University and following the principles set out in this *Code of practice*. Learning Analytics data will include:

- Data from the student record (e.g., demographic information, programme and module information, assessment results).

- Usage and activity data from University digital education platforms and systems (e.g., lecture capture (Panopto), e-text books, Library systems (Alma)).
- Usage and activity data from the University virtual learning environment (SurreyLearn).
- Attendance data (e.g., beacons, Wi-Fi data, reason for absence, paper registers).

10. Information will be provided to all staff and students about which data sources are being used within each system. Information is also included in the Student Privacy Notice and the Student Support Services Privacy Notice.

11. Only data that is appropriate to inform and support student success will be used in a Learning Analytics system and only at a level appropriate to highlight to staff where students may benefit from additional support, and for students to understand their own learning progress. Aggregate level data will be used for reporting and to enable the University to review practices and processes.

12. The University collects data from students for the administration and delivery of the student contract or statutory requirements, and in furtherance of the University's legitimate interests. As the use of Learning Analytics develops at the University, additional data sources may be considered useful to support staff and students. In such instances, students and staff will be informed in advance of its use, and consent will be requested and recorded where we are relying on consent to process the data. This will be discussed and agreed at the Student Experience Sub-Committee. In such instances this *Code of practice* will be updated accordingly.

13. Learning Analytics also captures data described in Data Protection Legislation as "special category data". The University will only use special category data when it has identified an appropriate condition for doing so and only where strictly necessary. Data such as diversity, health, and disability are captured to promote and maintain equality of opportunity and treatment for our students, to reach out and offer opportunities and support to groups of students, and to inform business analytics. This special category data will not be used to implement measures or decisions in respect of individual students. However, this data may be used by the University's Student Success Team to support individual students who may benefit from additional support as part of the Personal Tutor relationship, but only where the student has given their explicit consent to do so. Special category data will not be included in dashboards presented to students and staff.

14. This data will also be used at an aggregate level to identify trends and inform management decisions around equality of opportunity.

15. All uses of special category data will be considered carefully by the University Student Experience Sub-Committee (see the *Senate Governance*).

Responsibility and Governance

16. The Pro-Vice-Chancellor, Education has overall responsibility for Learning Analytics within the University of Surrey and is the accountable lead on the Executive Board. This section identifies where responsibilities are held for specific areas of Learning Analytics within the University.

17. The University Student Experience Sub-Committee, as a sub-committee of the University Education Committee (UEC), is responsible to UEC on all matters related to the student experience, providing strategic leadership to the student experience in areas including access, progression, student attainment and outcomes. The Sub-Committee is responsible for the Learning Analytics *Code of practice* and for

overseeing that the University's strategy for the use of Learning Analytics is in line with this *Code of practice*.

18. The Director of Student Life has responsibility for the ongoing use of the platform.

19. The MySurrey Engagement/Attendance Task and Finish Group will operate as a consultative group, reviewing, agreeing, and providing feedback on the operationalisation of the platform. This will include reviewing all aspects of service provision and realising the benefits of Learning Analytics in line with the University's standards of education and the adoption of Continuous Improvement.

20. The Director of Student Life is the operational lead for Learning Analytics. They will work with the Learning Analytics Community of Practice in developing new system requirements and ensuring Learning Analytics remains relevant and useful to academics and students.

21. Personal Tutors, Senior Personal Tutors, Student Success Coaches, and MySurrey Hive Case Coordinators will use the data to identify students that are not engaging in the same way as their peer group and aim to engage with these students to support them in improving their engagement and continuing their studies successfully.

22. The Business Improvement Team in the Chief Student Officer (CSO) Directorate will act as administrators of the system and monitor data feeds to ensure an accurate and up to date picture of the student's profile is available.

Transparency

23. The University will be transparent in explaining clearly to staff and students the data sources used, the purposes of the analytics, the metrics used, who has access to the analytics, the boundaries around usage, and how to interpret the data. This information is provided in Appendix 2.

24. The University processes student data for the administration and delivery of students' contact with it. Information on what data is collected and how it is processed can be found in the Student Privacy Notice and the Student Support Services Privacy Notice.

25. Based on the assessment of the Learning Analytics data, staff may contact individuals or groups of students and offer them the opportunity to discuss their engagement and outline University support services and/or initiatives they can choose to take up to improve their academic outcomes and wellbeing.

26. Students can choose to take up these personal interactions or not. This will usually be done at the point where a specific interaction is proposed. However, in some cases where concerns are raised in relation to legal, regulatory, and/or safeguarding matters, the University may take action that means that students are not permitted to opt out of such interactions. Where this occurs, in each case the reasons will be recorded using existing systems and processes.

27. Details on when interactions will be triggered, the types of support on offer, and when we are required to act are outlined in Appendix 2.

Privacy

28. Access to Learning Analytics data by students and staff at the University will be in line with all relevant policies, including but not limited to: *Code of practice for student engagement*; Data Policy; Information Security Policy; IT Acceptable Use Policy.

29. Access to student data and Learning Analytics is restricted to those identified by the University as having a legitimate need to view them. The following groups will have

access to individual Learning Analytics data held by the University of Surrey for the following purposes:

- Students – accessing their own Learning Analytics data.
- Personal Tutors, Senior Personal Tutors and staff employed within the Student Success and EDI Team, MySurrey Hive Case Coordinators, and Student Success Coaches to enable them to support students in their learning journey. Typically, this will identify a student or groups of students that may need additional support or provide feedback on progress made. It will also be an opportunity to follow-up where interactions have taken place.
- Student Records and Data team (including Immigration Compliance team) to enable the University to monitor engagement in line with the requirements of the University in regard to UKVI visa compliance, and other government and professional bodies. Students will be contacted accordingly and asked to follow their obligations, as outlined in the Student Contract.
- The Office of Student Appeals, Complaints and Regulation (OSCAR) may make a request for information to support evidence gathering for academic appeals, fitness to practise cases, fitness to study matters, complaints, managed exclusion orders, student discipline, and criminal conviction disclosures. Where they are engaged with a procedure, students can use their data as evidence.
- Staff who need the data to provide support to students.
- Technical staff at the University and contracted agents who need to ensure functioning systems.

30. The following groups can be provided with aggregated Learning Analytics data held by the University of Surrey:

    - Members of staff with responsibility for education and student experience.
    - Other individuals or organisations working with students as part of their learning at University of Surrey e.g., the NHS.

31. Access permissions will be used to ensure that access to identifiable data is limited to that which is needed for these purposes. Outside of this, Learning Analytics data will be anonymised or aggregated as necessary for use.

32. Where anonymised student data collected for or generated by Learning Analytics is published, the University will ensure it is not possible to identify individuals from metadata, or by aggregating multiple data sources. Where data is to be used anonymously, particular care will be taken to avoid:

    - Identification of individuals from metadata.
    - Re-identification of individuals by aggregating multiple data sources.

33. Where access to Learning Analytics data must be shared with external individuals and organisations, the appropriate contracts, data processing, and data sharing agreements will be in place in compliance with University policies and UK data protection legislation. Circumstances where data and analytics could be shared externally – e.g., requests from educational authorities, security agencies or employers – will be made explicit to staff and students.

34. In accordance with UK data protection legislation, students will be able to access all Learning Analytics performed on their data in meaningful, accessible formats, and to obtain copies of their data in a portable digital format. Students will be able to correct inaccurate personal data held about themselves through accessing their student record at Surrey Self-Service.

35. The University will undertake regular reviews of the Data Protection Impact Assessment for its use of Learning Analytics across the organisation.

Validity

36. The quality, robustness, and validity of data and analytics processes will be monitored and regularly reviewed to develop and maintain confidence in Learning Analytics and ensure it is used to support and enhance education at the University of Surrey.

37. The University will ensure that:

- Inaccuracies in the data are understood and minimised.
- Datasets used in Learning Analytics systems are robust and clear.
- The implications of incomplete datasets are understood.
- The optimum range of data sources is selected.
- Spurious correlations are avoided.
- The analysis, interpretation, and use of Learning Analytics data does not reinforce discriminatory attitudes or increase social power differentials.

Learning Analytics Platform

38. Students will be provided with access to a platform that will show their Learning Analytics data and insights generated, and they can choose whether to access these data.

39. Relevant staff will be able to access students' Learning Analytics data to support students. Staff may discuss this data with students and may suggest actions to students based on the data. For this purpose, "staff" will refer to a student's Senior Personal Tutor, Personal Tutor, Student Success Coach, and members of the Student Success Team.

40. The allocation of resources for Learning Analytics for learners with different requirements will be decided by the University and in a way that ensures diverse groups and individuals are treated equitably.

Student Support and Learning Analytics

41. Student Support is set within the context of the University's primary role as an education provider. Our intention is to enable and empower students to be able to engage fully with all aspects of their student lives, removing barriers as necessary, for them to achieve their maximum potential and succeed in their studies and life after the University of Surrey.

42. Learning Analytics provides the opportunity for an earlier, more proactive, and informed discussion with students regarding support, primarily but not exclusively and, where necessary, the provision of information regarding specialist support services. It provides an additional element of information and data which will help inform our approach to supporting students; however, it does not in itself change our intentions or responsibility to support students. The process to be used for student interactions is provided in Appendix 1.

43. The University recognises that analytics can never give a complete picture of an individual's learning and may not consider personal circumstances. It also recognises the importance of individual conversations alongside data analysis to obtain a more complete view of a situation. Steps will be taken to ensure that trends, norms, categorisation, or any labelling of students do not bias staff, student or institutional

perceptions and behaviours towards them, introduce discriminatory attitudes, or increase power differentials.

Stewardship of data

44. Data for Learning Analytics will comply with existing University of Surrey data policies as set in paragraph 7 above and UK data protection legislation, and be:

    - Kept to the minimum necessary to deliver the purposes of the analytics reliably.
    - Processed in the European Economic Area or, if elsewhere, only in accordance with UK data protection legislation.
    - Retained only for appropriate and clearly defined periods as defined by the University's standard document retention requirements.

45. Personal data used for or generated by Learning Analytics may be destroyed or anonymised on request, except for certain, clearly specified data fields required for educational, regulatory, or statutory purposes such as grades.

46. Learning Analytics data will only be captured and accessed via the approved University Learning Analytics systems and processes and only in line with this *Code of practice*. Once systems and process are in place, this document will be updated to include their details and users notified of such changes.

47. This *Code of practice* is part of the University Quality Framework and is subject to a regular cycle of review overseen by the Academic Registry. Earlier reviews can be initiated as required.

About this document

This document draws on many elements from the University of Leeds Learning Analytics *Code of Practice*.

Appendix 1: Guidance on Triggers for Interactions

The MySurrey Engagement Platform will provide information on student activities through different resources. Resources include SurreyLearn (VLE), Kortext (e-Text Books), and Panopto (Video Capture). The level and type of activity will yield a daily student engagement score which can be viewed over time through a dashboard by the student and a similar dashboard is provided for academic staff. A typical dashboard is shown in Table 1 below:

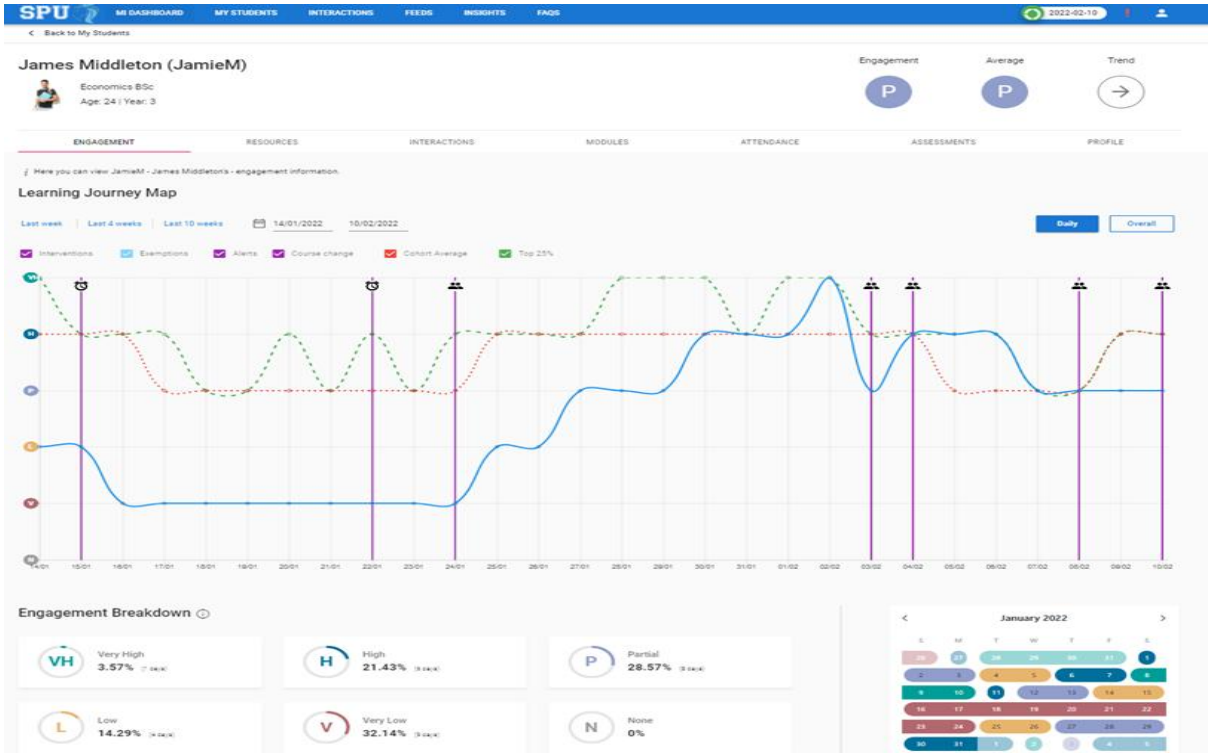


Figure 1 Typical Student Dashboard

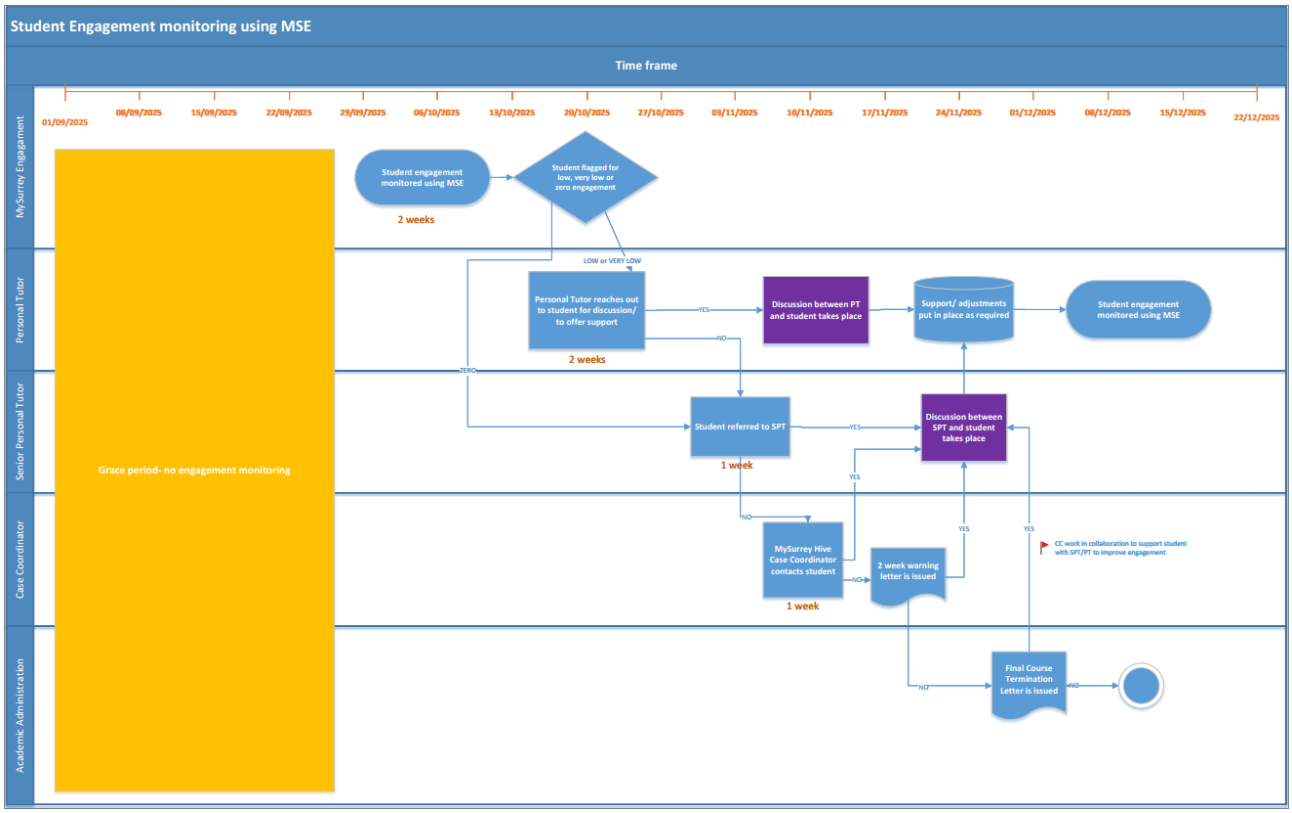
Additional student activities will be added to MySurrey Engagement. The student will be able to compare their engagement rating with their peers on the same programme, should they wish to do so.

There are several triggers that can alert interested parties to a student that may benefit from some additional support. It is important to note that these alerts or triggers do not tell the whole story; they are simply an indication that should be explored. Sometimes a student will have valid reasons for a change in activity which may be short lived. However, the earlier these indications are explored the better the outcome for the majority of cases.

Typically, a trigger would include if a student:

- Consistently has a lower engagement rating.
- Is consistently not engaging with an important resource (e.g. SurreyLearn).
- Drops two or more engagement levels over a short period of time.
- Consistently submits assignments late.
- Is consistently not attending classes.

The above list is not exhaustive; good judgement and contextualised information will be used and the interaction with the student will be key in jointly agreeing if any follow-up actions are required. At any stage a student may request help or staff can make a referral irrespective of any specific engagement score or student activities.



Appendix 2: Operationalising the Student Attendance Capture System (MySurrey Attendance)

Class attendance is strongly encouraged because the skills and knowledge gained during class significantly enhances the student learning journey and the outcome.

The University has invested in an attendance capture tool which simplifies the attendance process and will provide data into MySurrey Engagement (our Learning Analytics Platform) for Student Engagement.

MySurrey Attendance will provide:

- Mobile apps (iOS & Android) and web browser access.
- Personalised timetabling for students and academics.
- Multiple technologies for check-in validation.
- Student check-in by Lecturer (time permitting and in exceptional circumstances).
- Student check-in after class closure.
- Interface with MySurrey Engagement dashboard.
- Reporting capability supporting legal and contractual obligations.

The principles under development are:

- A student needs to make reasonable efforts to check-in to their classes or record their absence.
- If a student has taken all reasonable steps but the class registration has not worked, then a process to address this will be used.
- The new Attendance Capture tool will replace all attendance registers currently in use (manual or automated).

Reports to support UKVI compliance and contractual obligations will be developed (in conjunction with the MySurrey Engagement platform).