UWS | UNIVERSITY OF THE WEST of SCOTLAND

Privacy Notice – Learner Analytics   **January 2024**

Learning analytics means the measurement, collection, analysis and reporting of data about the progress of our students and the contexts in which learning takes place. Using the increased availability of big datasets around learner activity and digital footprints left by student activity in learning environments, learning analytics can provide an insight into a students learning journey, but of course not tell the full story.

The data will be used to inform the work of the student success team, proactively contacting students with low to no engagement in their programme and supporting them back to their studies. Students can opt out of calls from the Student Success team.

The data will also be used to identify students that are assumed withdrawn in line with the Student Attendance and Engagement Procedure, and in partnership with Schools, Student Services and the Library, where students have demonstrated no evidence of engaging with the University for six or more weeks during term time they will be assumed to have withdrawn.

A student that is assumed to have withdrawn will be contacted by the University in the form of an "Assumed Withdrawn" letter. If the student does not respond to the letter they will be formally withdrawn on the authority of the School Dean.

A student will have the right of appeal against a decision to withdraw them from a programme of study through the Appeals Procedure.

Privacy Notice

The University is committed to looking after any information that we hold about you. We aim to be clear about what we will do with your data. This privacy notice explains when and why we collect personal information about you and how we will use this information including the ways we might share this with others. It also explains how we keep your information secure as well as the rights you have in relation to the information we hold about you.

The headings below set out the main information we need to give to you.

The privacy notice will be regularly reviewed to make sure it contains the most up-to-date information. We will let you know if we make significant changes to this privacy notice.

If you have any questions about any of the information contained in this privacy notice then you can contact us on dataprotection@uws.ac.uk

Who are we?

The University of the West of Scotland (referred to in this Privacy Notice as the "University", "we", "our" or "us") is the Data Controller under the data protection legislation. This privacy Notice sets out how we process the personal data we collect about you (referred to in this Privacy Notice as "you" or "your").

What type of information do we collect about you?

Our learner analytics dashboard collects information about our undergraduate and postgraduate students and how they engaging with our learning resources. This dashboard creates an engagement scores based on learner activity and digital footprints left by student activity in learning environments. This scores helps us identify students who may require extra support or who may fall under the Student Attendance and Engagement Procedure.

What are the sources of the information we hold about you?

We will collect information through your attendance scanning data and how often you access the library resources, banner and our virtual learning environment (Aula). We will also collect information about the volume of material and feeds you view on Aula and any of our other learning environments.

Other data that will be included as part of your profile will be name, university email address, personal email address, Banner ID, campus location, personal tutor name, enrolment status, mobile number, home phone number, programme of study and year of study.

How will we use your information?
The main purposes for which we will process the information we hold is:

- To indicate your level of engagement in your programme of study and help us identify any potential difficulties you may be having:
- Offering you the opportunity to discuss any engagement issues with our student success team;
- Helping put in place support measures by providing signposting information relating to the support available to you at UWS, organising appointments with Student Services teams and referring back to you School for further support.

Why do we need to process your personal data?

We already hold your personal data to administer our contract to deliver your programme of study to you. This information will be analysed to determine your engagement in the programme. This processing is necessary as part of our public task to provide a supportive learning environment for our students and encouraging them to succeed in the programme of study.

Subsequent contact from our student success team and any additional information you choose to provide them will be based only upon your expressed consent. We do not anticipate that any sensitive information will be collected about you, for example, about any disability you may have. However, if you feel this may be useful to share with our student success team then you may choose to do this and we will store this with your consent.

How long will we keep your information for?

The information you provide will be retained in the dashboard for a period of two years, following the end of the academic year to which it relates and will then be destroyed.
We may retain some anonymised information for longer in order to improve our service to students, for example in helping us understand the experience our students have when they study with us by looking at engagement levels on specific programmes. You will not be identifiable when we use this information.

Who has access to your information and who will we share your information with?

We will always make sure that when we share information about you that we do this in line with the legislation and that we only share the minimum amount of information that is needed. The information you submit to us will only be accessed by a limited number of University staff who need this information to support disengaged students back to their studies or to positive destinations and to carry out the Student Attendance and Engagement Procedure.

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What choices do you have in relation to your information?

Under the legislation you have certain rights in relation to the information we hold about you:
- To obtain access to, and copies of personal data we hold about you;
- To require us to stop processing your personal data if the processing is causing you damage or distress;
- To require us to stop sending you marketing communications;
- To require us to correct any personal data we hold about you that is incorrect;
- To require us to erase your personal data;
- To require us to restrict our data processing activities;
- To withdraw your consent to our data processing activities (without affecting the lawfulness of our processing before you withdrew your consent);
- To receive the personal data that we hold about you, in a reasonable format specified by you, including for the purpose of you transmitting that personal data to another controller;
- To object, on grounds relating to your particular situation, to any of our particular processing activities where you feel this has a disproportionate impact on your rights.

Many of the rights above are not absolute so there may be times when you make a request to us and we are unable to meet it in full but if this is the case we will explain to you fully why we have not been able to do what you have asked.

More detailed information about the rights you have any how you can make a request can be found on our website.

How will we keep your information safe?

All personal information we hold about you is held on secure servers. If we hold paper records about you then we make sure that staff are trained about how they should handle this information and make sure it is stored securely.
- Firewall
  A firewall is a network security device that monitors incoming and outgoing network traffic and decides whether to allow or block specific traffic based on a defined set of security rules.
  Rules are designed to provide a balance between strong security and allowing staff and students appropriate access to teach and study.
- Patch Management
  Patch management is a strategy for managing security fixes or upgrades for software applications and technologies. A patch management plan helps the organisation handle these changes efficiently and in a controlled and fully tested manner. We patch our devices and systems as part of a 30 day rolling process. Critical security patches are installed as required.
- Access Control
  Access control is a security technique that can be used to regulate who or what can view or use resources in a computing environment.
  Access to files and folders and connections to computer networks is based on user credentials, login and password.
- Event/Network Monitoring
  The UWS network is constantly monitored for anomalous behaviour which would be associated with cyber-attacks. Event monitoring tools help us to monitor details of activity on the network and allow us to highlight areas of concern for further

investigation. Identifying anomalies quickly is vital to securing the confidentially, integrity and availability of data on our network.

- Anti-Virus
Anti-Virus protection is installed on all endpoint devices and updated at least daily with the latest vendor updates.
Antivirus software is designed to prevent, detect and remove malware infections on individual computing devices, networks and IT systems.
Our antivirus software programs include real-time threat detection and protection to guard against potential vulnerabilities as they happen, as well as system scans that monitor device and system files looking for possible risks.

Will we transfer your information outside of the EEA?

The information you provide will not be transferred out of the EEA.

Who is the University's Data Protection Officer?

The Head of Legal Services is the UWS Data Protection Officer. If you have any concerns about how we handle your personal data then you can contact the Data Protection Officer directly by e-mail dataprotection@uws.ac.uk or by post at Data Protection Officer, University of the West of Scotland, Legal Services, High Street, Paisley, PA1 2BE.

How can I complain about your use of my information?

If you remain unhappy then you have a right to complain to the Information Commissioners Office:
Information Commissioner's Office
Wycliffe House
Water Lane
Wilmslow
Cheshire
SK9 5AF
e-mail: casework@ico.org.uk and telephone 0303 123 1113