

Student Engagement and Attendance Monitoring Code of Practice

1. Introduction

For the purposes of this Code of practice, Learning Analytics has been defined as "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." (International Conference on Learning Analytics, 2011).

This Code is based on the principles set out in the Student Engagement Policy that:

- a) Students are accountable partners in their education and are expected to proactively engage in the educational experience offered by Kings College London;
- b) Consistent levels of engagement support the achievement of the best possible educational outcomes;
- c) Lack of engagement may indicate that students are having difficulty managing the demands of a programme of study allowing early interventions to result in better student outcomes;
- d) The university provides access to proactive support where there are known challenges with a student's ability to engage with their studies;
- e) Students are accountable partners in their educational experience and;
- f) External regulatory attendance requirements are met in order for students to meet any Professional Accreditation, Professional Statutory and Regulatory Bodies (PSRBs) or UKVI thresholds

Its aim is 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.

2. Scope

This Code of Practice and [Student Attendance Monitoring Procedure](#) applies to all students enrolled to study in-person foundation, undergraduate, post-graduate taught and post graduate research programmes including students in receipt of a UK Tier VI visa.

The Code has been produced at part of the [Student Engagement and Attendance Monitoring Policy](#).

3. Objectives

- a) To provide access to the Data of individual student attendance and engagement to relevant staff in order to:
 - o support student engagement.
 - o monitor engagement to meet the legal and regulatory requirements under our UK Visas and Immigration Student Sponsor Licence, and other government and professional bodies.

- b) To do this in a manner consistent with good data ownership and management under the [Data Governance Policy](#) and the [Data Protection Policy](#).
- c) To provide information to the university about the level of engagement of individual students to inform appropriate decision making regarding future improvement of teaching and learning.
- d) 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.
- e) To develop a programme of research and evaluation to measure the impact and effectiveness of the Data to enhance student learning and student support.
- f) To integrate the Data with business intelligence and data analytics processes, to provide aggregated information for decision-makers and external reporting purposes.

4. Use of the Data.

The Data will be managed in line with the [Student Engagement and Attendance Monitoring Policy](#).

The university will:

- (i) Use the Data to support student learning, engagement, and wellbeing by:
 - monitoring student engagement and attendance;
 - reviewing and authorising student absence notifications;
 - communicating with students who are indicated as disengaging with their programme of studies;
 - referring students to university support services where appropriate.
- (ii) Use the Data according to defined guidelines as outlined in this Code and in accordance with our wider regulatory frameworks;
- (iii) Collect the Data transparently and ethically, and ensure that where the Data is shared, it is clear whom the Data will be shared with and why;
- (iv) Communicate widely and regularly with students and staff about the use of the Data;
- (v) Use the Data to improve its processes and practices, in consultation with and for the benefit of staff and students;
- (vi) Use any predictive analytics transparently;
- (vii) Actively work to recognise and minimise potential for bias when processing the Data, and will endeavour to minimise possible negative impacts, focusing on individuals and their circumstances;
- (viii) Regularly monitor, and quality assure the use of the Data to make certain it is meeting the objectives of the wider university strategies for education;
- (ix) Use the Data to enable staff to have conversations with students about their individual progress and support needs
- (x) Provide on-going training and support for staff and students in the appropriate use of the Data using the university's annual data protection training.

5. Data Sources

Data collected and processed to provide information on the engagement of students with their studies will include:

- Data from the student record held on student record management systems i.e. to create class lists, monitor change of circumstances etc.
- Usage and activity data from digital education platforms and systems such as KEATS, lecture capture, Inplace.
- Attendance data (in person attendance capture, reasons for absence etc.)

6. Privacy & Access to the Data

The Data will be accessed by relevant staff members as set out in the Student Engagement and Attendance Monitoring Procedure and in line with all relevant policies, including but not limited to: [Student Engagement and Attendance Monitoring Procedure](#), [Data Protection Policy](#), [Information Security Policy](#), [IT Acceptable Use Policy](#).

It will be restricted to those identified by the university as having a legitimate need to view Data including students accessing their own Data.

Access permissions will be used to ensure that access to Data is limited to that which is needed for the purposes outlined in S4. Outside of this, Data will be anonymised or aggregated as necessary for use.

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.

The university will undertake regular reviews of the Attendance & Engagement Monitoring data protection impact assessment.

7. Governance

The university is the data controller in respect of the personal and special category data it processes. The Student and Education Directorate have stewardship over student data and course information under the College's Information Governance Framework. This Code of Practice will be maintained by the Student Education Directorate.

The proposed governance structure would be as follows:

- Vice President Education & Student Success or equivalent has overall responsibility for the Data and the accountable lead on the Executive Board and feeds up from the

College Education Committee (CEC)

- CEC
- A Student Experience Sub-committee, as a sub-committee of CEC responsible for the Code of Practice and for overseeing that the university's strategy for the use of the Data is in line with this Code of Practice.
- A Data Programme Board or Specialist Focus Group (SFG) that feeds into CEC and has responsibility to deliver the programme of change
- A dedicated resource within the Faculty to operationalise and follow up non attendance. AD/Head of to be the operational lead.
- A Data Community of Practice/SFG to operate as a consultative group, reviewing, agreeing, and providing feedback on the operationalisation of the platform.

8. Validity

The quality, robustness and validity of the Data and analytics processes will be monitored and regularly reviewed to develop and maintain confidence in the Data to ensure it is used to support and enhance education at KCL.

The university will ensure that:

- Inaccuracies in the Data are understood and minimised.
- Datasets used 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 the Data does not reinforce discriminatory attitudes or increase social power differentials.
- That data sets are used to triangulate facts and data sets are viewed holistically and qualitatively.