

## Privacy Notice - for Learning Analytics

Ayrshire College (the College) is providing you with this information to comply with data protection law to ensure that you are fully informed and that we are transparent in how we collect and use your personal data.

Your privacy and trust are very important to us and this Privacy Notice provides essential information about how the College handles your personal data (information) and the rights you have in relation to how we use your data. The College is committed to complying with all applicable Data Protection legislation.

## Who are we?

Ayrshire College is the 'Data Controller' and is responsible for looking after the personal data that you provide.

Registered office – Ayr Campus  
Dam Park, Ayr  
KA8 0EU

For any queries or concerns about how your personal data is being processed you can contact the Data Protection Officer (DPO) at [dataprotection@ayrshire.ac.uk](mailto:dataprotection@ayrshire.ac.uk).

## This privacy notice relates to the following process:

USE OF LEARNING ANALYTICS/ RETENTION TOOL

Ayr Campus  
Dam Park  
Ayr, KA8 0EU  
T 01292 265184  
E [enquiries@ayrshire.ac.uk](mailto:enquiries@ayrshire.ac.uk)

Kilmarnock Campus  
Hill Street  
Kilmarnock, KA1 3HY  
T 01563 523501  
E [enquiries@ayrshire.ac.uk](mailto:enquiries@ayrshire.ac.uk)

Kilwinning Campus  
Lauchlan Way  
Kilwinning, KA13 6DE  
T 01294 559000  
E [enquiries@ayrshire.ac.uk](mailto:enquiries@ayrshire.ac.uk)

## Purpose for processing – why do we collect information about you?

We collect and use your information for the following purposes:

The “digital footprints” left when students use College services and systems can be combined with other data such as student attendance and referrals. Monitoring and collection of this type of data is often referred to as Learning Analytics.

- Learning Analytics is a profiling tool used to support students’ ongoing engagement and success in the college during their period of study. The purpose of profiling in this way is to provide support and pastoral care to students encouraging them to remain at College so they can achieve their goals.
- Statistical information will be used by a machine learning algorithm. This compares personal data against previous data sets to recognise patterns of behaviour likely to lead to disengagement of current students.

## Our lawful basis (reason) for processing your information is/are:

- You have given consent for the use of your personal data for learning analytics as detailed in this privacy notice.

**The data being used includes special category (sensitive) data. Our legal reason for using this sensitive data is/are:**

- You have given explicit consent to the processing of your personal data for learning analytics as detailed in this privacy notice.

## What information do we collect about you?

### Personal Data held within the Retention Tool:

- Name
- Address
- Personal email
- College email
- Home phone number
- Mobile phone number
- Days since you last used Moodle
- FE Funding allocation
- Number of self-certificates submitted by you
- Number of medical certificates submitted by you
- Number of days since you last attended college
- Weekly percentage attendance
- Additional details may be recorded as a result of your interaction with support staff.

### Special Category Data held within the Retention Tool:

- Details of whether you say you have Care Experience
- Additional medical information may be recorded as a result of your interaction with support staff.

### Personal Data held within Learning Analytics (used by the algorithm):

- Entry Qualification/Grade (Split into groups)
- Age (Split into groups)
- Previous success (Ayrshire College – If applicable)
- Previous Early Withdrawal (Ayrshire College – If applicable)
- Previous Further Withdrawal (Ayrshire College – If applicable)
- Bursary Amount (If applicable)
- Number of Self Cert submitted
- Previous Week Number of Self Cert submitted
- Previous Weekly Attendance
- Weekly Attendance
- Total Attendance
- Days Since Last Date of Attended/LDA

### Special Category Data held within Learning Analytics (used by the algorithm)

- None

## How do we collect it?

Ayrshire College collects personal information when you complete an enrolment form and at other points where you provide us information as a student. We also collect personal information on your participation in the college where you interact with college systems as a result of your ongoing study.

## If you were to withhold the information we require for this process, the consequences would be:

Learning Analytics is optional and there are no consequences to your ongoing studies if you choose not to participate.

## Who do we share your information with?

The College will not share your personal information with any third parties or use the information provided for any purpose other than outlined above. Access to the information in the retention tool and Learning Analytics (algorithm) data is provided on a business need to know basis for designated college staff.

## Details of data transfers to any third countries or international organisations

Your information will not be shared outside of the [European Economic Area](#).

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## How do we look after your information and how long do we keep it for?

We will take all reasonable steps to prevent the loss, misuse or alteration of information you give us. Your personal information will be stored securely and will only be accessed by authorised Ayrshire College staff who have a business need to know. They will only process your personal information on our instructions and they are subject to a duty of confidentiality and must comply with data protection law.

We have put in place procedures to deal with any suspected data security breach and will notify you and any applicable regulator of a suspected breach where we are legally required to do so.

Your information will be kept in line with the College's data retention schedule and then will be destroyed confidentially.

- The retention tool holds personal information for current students for the current academic year only.
- The Learning Analytics algorithm uses statistical information for current students plus one year. This means that statistical information will be used by the algorithm for one year after you have completed your course of study.

## Automated individual decision-making processes, including profiling.

The processing of your data involves automated individual decision-making. This is used in the following way:

Ayrshire College has developed an in house retention tool using Learning Analytics. The retention tool uses a machine learning algorithm to calculate a score for individual students. This is based on the review of key pieces of personal information held by the College (listed above). Where a score is given that indicates a student may be at risk of leaving the course then college staff contact the individual student to discuss possible interventions.

The use of this data for learning analytics is new, and can help students by giving lecturers, tutors and support staff better quality and up to date information on student progress. This helps the College to understand how students can be best supported to meet their goals, and achieve their full potential.

Only those members of staff who have a professional requirement to support a student are permitted to view the analytics information about any individual.

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## The significance and potential consequences of the Learning Analytics information is:

The Learning Analytics algorithm highlights any students who may be at risk of disengaging from their course of study. Designated staff will provide support to help students to complete their studies successfully.

Any students identified as being at risk of disengagement will be given the opportunity to receive targeted support to help them maintain their studies. Students do not have to accept this support.

## Your rights

Under Data Protection Legislation you have certain rights in relation to how the College manages and uses your personal information:

- The right to be informed (this is the Privacy Notice)
- The right to access your personal data
- The right to rectification if the personal data we hold about you is incorrect
- The right to restrict processing of your personal data

## In addition the following rights apply only in certain circumstances:

- The right to withdraw consent at any time (if consent is our lawful basis for processing your data)
- The right to object to our processing of your personal data
- The right to request erasure (deletion) of your personal data
- The right to data portability
- The right not to be subject to automated decision making including profiling (such as Learning Analytics).

For more information about your rights please see [www.ico.org.uk](http://www.ico.org.uk).

## Contact us

If you have any issues about this notice or the way the College has handled your personal information, please contact our Data Protection Officer in the first instance:

email: [dataprotection@ayrshire.ac.uk](mailto:dataprotection@ayrshire.ac.uk)

Telephone: 0300 303 0303 or write to:

Data Protection Officer  
Ayrshire College, Kilmarnock Campus  
Hill Street  
Kilmarnock  
KA1 3HY

## Complaints to UK Information Commissioner's Office (ICO)

If you are dissatisfied with the response from the College you have the right to lodge a complaint with the Information Commissioner's Office about our handling of your data:

email: [casework@ico.org.uk](mailto:casework@ico.org.uk)

Telephone: 0303 123 1113 or write to:

Information Commissioner's Office  
Wycliffe House  
Water Lane  
Wilmslow  
Cheshire  
SK9 5AF