Wellbeing Analytics

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Wellbeing situations (practical and legal)

Situation

- "I have a problem"

- "My friend has a (serious) problem"

- "Does anyone out there have a problem?"

- Number of unaffected people involved ↑

Likely Legal Basis (processing SCD)

➢ Informed Consent

➢ probably Vital Interests

➢ Preventive medicine (EU/GDPR)?
  - Only for employees, under UK DPA2018

➢ Confidential counselling/public interest (UK)?

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Which means…

At least for wellbeing analytics…

- Led by health professionals, not academic, not DPO, not technologists
- Documented policy, retention, etc.
  - And a process leading to "confidential counselling"
- Consent, where used, must be explicit, granular, etc.
- Data Protection Impact Assessment likely to be needed
  - Prior consultation with regulator, maybe
- NB: Subject access requires medical approval
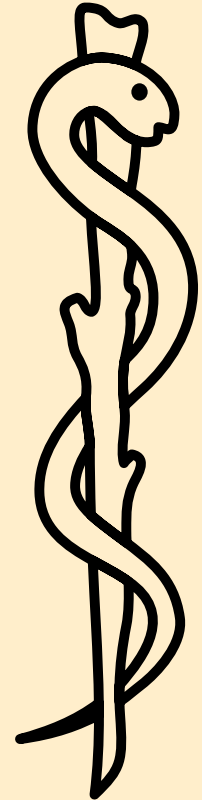
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Jisc (draft) Code of Practice

- Extends existing Learning Analytics CoP

- Covers above issues, also
  - Transparency about surprising inputs (e.g. finance)
  - Which conversations/interventions need health context?

- Currently in consultation
  - Comments & suggestions very welcome

Code of practice for learning analytics
Setting out the responsibilities of educational institutions to ensure that learning analytics is carried out responsibly, appropriately and effectively.

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Published: 4 June 2015
Updated: 15 August 2018

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Introduction

Learning analytics uses data about students and their activities to help institutions understand and improve educational processes, and provide better support to learners.

Learning analytics should be used for the benefit of students. This might be to assist them individually or through using aggregated and anonymised data to help other students. Learning analytics might also be used to improve the educational experience more generally. It is distinct from assessment, and should be used for formative rather than summative purposes.

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Conclusions

- Beware of perceived surveillance
  - No one asks Big Brother for help
- Strive to remove inaccuracy
  - Know you'll never achieve it
- Start from robust "my friend" process
  - Algorithmic "friend" knows…
    - Everything about data…
    - Little about context…
    - Nothing about empathy ☹

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