

Privacy Notice – Brightspace VLE

The Data Controller of the information being collected is: The University of the Highlands and Islands (UHI), Executive Office, 12B Ness Walk, Inverness IV3 5SQ. Phone: 01463 279000.

For any queries or concerns about how your personal data is being processed you can contact the relevant Data Protection Officer at dataprotectionofficer@uhi.ac.uk

This privacy statement relates to the following process:

Use of student data generated in Brightspace, including data recording students' interaction with Brightspace resources and activities.

Your information will be used for the following purposes:

Purpose 1: Confirming initial engagement with the Brightspace learning environment	<p>The data that is generated in relation to student interaction with the Brightspace learning environment will be used by lecturing staff to determine whether each student is enrolled on and has successfully accessed their programme/module(s)/unit(s) at or near the outset of each semester.</p> <p>Where a student has not accessed their programme/module(s)/unit(s) within the initial stages of the semester, then the programme, module or unit leader may contact the individual student to determine whether they are having technical or other difficulties in engaging in the online element of their studies, or their studies more broadly, that they can be supported in addressing.</p> <p>In some instances, the module or unit leader may seek the assistance of the student's Personal Academic Tutor/relevant student advisor/support staff in either contacting the student, or in referring the student to their Personal Academic Tutor/a relevant student advisor/relevant support staff for further support.</p>
Purpose 2: Ongoing engagement in formal learning activities	<p>The data that is generated in relation to student interaction with the Brightspace learning environment will be used by lecturing staff to determine whether each student is engaging with Brightspace on an ongoing basis to access the learning and teaching resources and undertake the formal learning</p>

	<p>activities that are part of the module(s)/unit(s) each student is enrolled on.</p> <p>Formal learning activities include any activities within module(s) and unit(s) within which there is a clearly mandated or clearly communicated expectation that students should engage in those activities as part of their studies and learning. This is inclusive of individual and collaborative activities.</p> <p>Where a student has not engaged in any formal learning activities being supported through Brightspace within the stated timeframe for completion, the module or unit leader may contact the individual student to determine whether they are experiencing challenges or difficulties that they can be supported in addressing.</p> <p>In some instances, the module or unit leader may seek the assistance of the student's Personal Academic Tutor/relevant student advisor/support staff in either contacting the student, or in referring the student to their Personal Academic Tutor/a relevant student advisor/relevant member of staff for further support.</p>
<p>Purpose 3:</p> <p>Undertaking assessment including submission of coursework</p>	<p>The data that is generated in relation to student interaction with the Brightspace learning environment will be used by lecturing staff to determine whether each student has completed and submitted any assessment activities (including online tests or examinations, and individual and group coursework) that is either to be completed within or submitted to Brightspace.</p> <p>Where a student has not completed assessments or submitted coursework within or through Brightspace within the stated timeframe for completion, the module or unit leader may contact the individual student to determine whether they are experiencing challenges or difficulties that they can be supported in addressing.</p> <p>In some instances, the module or unit leader may seek the assistance of the student's Personal Academic Tutor/relevant student advisor/support staff in either contacting the student, or in referring the student to their Personal Academic Tutor/a</p>

	relevant student advisor/relevant member of staff for further support.
Purpose 4: Programme/module/unit evaluations	The data that is generated within Brightspace that relates to general patterns of student engagement within a programme/module/unit cohort may be used by programme/module/unit leaders to provide summary statistics (anonymised and relating to the cohort in question) that are included in annual monitoring and reporting to ensure the health and effectiveness of programmes/modules/units in providing an effective and well supported learning experience.
Purpose 5: External Examining	The data that is generated in relation to student interaction with the Brightspace learning environment will be visible to (and may be used by) any External Examiners who are given access to programmes/modules/units within Brightspace in order to undertake their duties in independently evaluating and reporting on the nature and standards of learning and teaching, assessment and feedback practices.

Our legal reason for using the data is/are:

Public task

Public task. Our use of the data identified for the purposes described is to ensure that students are engaging with their programme/module(s)/unit(s) that comprise their course of study, to identify and offer support to students who may be experiencing challenges relating to their engagement, and to evaluate and refine learning, teaching and assessment practices in relation to our programmes, modules and units.

Use is necessary for the University and our Academic Partners to perform its public task to deliver quality fundable education and research and support students in their learning (under the Further and Higher Education (Scotland) Act). Supporting students is paramount to enhancing the educational experience, the quality of teaching and learning and student welfare. The processing is necessary to deliver the best possible student support in keeping with relevant national standards and frameworks for the delivery of tertiary education.

Your data will, or may, be shared with the following recipients or categories of recipient:

Outwith UHI:

- External examiners who are required to be given direct access to programmes/modules/units in Brightspace in order to undertake their independent external examination duties will have full read-only access to student data.
- External examiners will have access to programme/module/unit evaluations and reports within which anonymised data relating general patterns of engagement including coursework and assessment grades are provided for the programme/module/unit in question.
- External panel members for programme approval and validation events may also be provided with anonymised general data of the above nature.
- For school pupils who undertake units or modules through the university or one of our Academic Partners as part of their school studies, data regarding engagement with Brightspace may be shared with the school to evaluate and manage the learning and teaching experience and to offer additional support where required.

External integrated services:

- D2L (as the service supplier of Brightspace)
- Turnitin
- Medial
- Urkund
- Wiley
- Talis
- Webex

Within UHI:

- Programme/module/unit leaders
- Personal Academic Tutors
- Student support staff who have responsibility for developing and delivering student support services, policies and procedures
- Relevant administrative staff (including those preparing documents for programme review and planning events)
- Professional services staff who work with programme/module/unit teams for the purposes of supporting enhancement in learning, teaching and student support

- Senior academic and/or managerial staff and nominated student representatives where student data is required for the investigation and resolution of complaints or disputes

The following personal data being used for this process originates from:

Data fields

UHI ID, User ID, your name, email address. IP address

Data categories

Attendance, assignment submission, chat session logs, course accesses, discussion posts, grades data, quiz and surveys

The data originates from these sources:

- SITS (Student records system)
- Brightspace – based on your interaction with the system

Your data will be retained for the following length of time:

Learning content and student interaction data will be retained for the current academic year +5 years.

The following rights are rights of data subjects:

- 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

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

You also have the right to lodge a complaint with the Information Commissioner's Office about our handling of your data.