Learning Analytics Data Erasure

A guide for users of Learning Analytics

## What is the aim of this guide and who is it for?

This guide is for Higher and Further Education institutions who use the learning analytics service offered by Jisc. Its purpose is to define the process for data deletion in line with our obligations as a data processor.

## What is the role of the institution?

As the Data Controller, the institution can specify a retention schedule or ad hoc deletion of records as it wishes, and Jisc as Data Processor, will comply with the schedule.

*The data retention compliance obligations are set out in Section 9.1.10b of the Data Protection Agreement (DPA):*

*…the date on which the Institution Data is no longer relevant to, or necessary for, the performance of the Learning Analytics Services,”, “cease Processing any of the Institution Data and, within sixty (60) days of the date being applicable under this Clause 9.1.10, return or destroy (as directed, in writing, by the Institution) the Institution Data belonging to, or under the control of, the Institution and ensure that all such data is securely and permanently deleted from its systems, provided that Jisc shall be entitled to retain copies of the Institution Data for evidential purposes and to comply with legal and/or regulatory requirements;”.*

On data retention the ICO sets out guidelines as part of principal ‘e’ on storage limitation. At a glance these are:

* You must not keep personal data for longer than you need it.
* You need to think about – and be able to justify – how long you keep personal data. This will depend on your purposes for holding the data.
* You need a policy setting standard retention periods wherever possible, to comply with documentation requirements.
* You should also periodically review the data you hold, and erase or anonymise it when you no longer need it.
* You must carefully consider any challenges to your retention of data. Individuals have a right to erasure if you no longer need the data.
* You can keep personal data for longer if you are only keeping it for public interest archiving, scientific or historical research, or statistical purposes.

Jisc provide further guidance on how this relates to the education sector:

<https://www.jisc.ac.uk/guides/records-retention-management>

## What is the role of the Learning Analytics service?

As a data processor our responsibility is to have a clear mechanism for deleting data across the component parts of the service within a given timeframe, securely and permanently.

As data processor we will advise as to the impact on the service to the institution in removing data such that it might affect live operation.

We will ensure that erasure requests from the data owner will be processed within 60 days of receipt of the request.

Data deletion requests will also be monitored for compliance by the central Information Security team in Jisc.

## What is the mechanism for deleting data?

Jisc stores 2 forms of records for students and due to the nature of their storage, each require separate mechanisms for deletion.

### Student Records (UDD)

UDD data in the Learning Data Hub will match the dataset you provide us daily. If you remove records from your dataset, this will also be reflected in the database and the appropriate records are removed during syncing.

### Student Activities (xAPI)

xAPI records can be purged by a batch delete process. We identify the records to be deleted based on the student identifier and use this as our filter.

As the filter passed in may apply to a large amount of data, a batch delete job is split out into batches, each deleting up to 1000 records at a time. Each successive batch will trigger another deletion job to the worker,

until no more statements exist in the database matching that filter.

All potential student identifiers should be provided as these may differ from the integrated systems or datasets. For example:

* STUDENT\_ID = STU1234567
* VLE\_ID = [joe.bloggs@jisc.ac.uk](mailto:joe.bloggs@jisc.ac.uk)
* SHIB\_ID = [stu1234567@jisc.ac.uk](mailto:stu1234567@jisc.ac.uk)

Each identifier must be provider to be fed into the deletion filters.

These should be provided as a tab separated file with the following fields:

|  |  |  |
| --- | --- | --- |
| **STUDENT\_ID** | **VLE\_ID** | **SHIB\_ID** |
| STU12345 | [joe.bloggs@jisc.ac.uk](mailto:joe.bloggs@jisc.ac.uk) | [stu1234567@jisc.ac.uk](mailto:stu1234567@jisc.ac.uk) |
| STU24689 | [john.doe@jisc.ac.uk](mailto:john.doe@jisc.ac.uk) | [stu24689@jisc.ac.uk](mailto:stu24689@jisc.ac.uk) |
| STU98765 | [jane.doe@jisc.ac.uk](mailto:jane.doe@jisc.ac.uk) | [stu98765@corp.jisc.ac.uk](mailto:stu98765@corp.jisc.ac.uk) |

Each row should represent a student whose data is to be removed.

This should be provided in the following directory on the SFTP Server:

**/activity/delete-request/deletions.tsv**

You should email [help@jisc.ac.uk](mailto:help@jisc.ac.uk) to confirm the delete request along with the total students to be removed. We need a clear point for auditing and authorisation to remove data. This will then be picked up by the Data Integration Team for action.

We will respond to the help ticket with the number of records deleted and close the call when completed.