Student Data Use and Privacy in Higher Education

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Opportunities

The potential value of responsible data use is almost endless. Here are a few examples of how student data can benefit individual college students and the student population as a whole:

- Identifying and providing counseling to students who are at risk of dropping out;

- Using data to identify difficult classes (e.g. chemistry, biological science) and developing tutoring programs to promote student success;

- Providing data directly to students (usually through an online dashboard) to enhance students' ability to self-manage;

- Determining which students are more likely to face financial difficulties and proactively offering those students additional monetary resources;

- recognizing and developing programs that address the specific needs of a diverse student population;

- Developing a more inclusive admissions plan.

Risks

Data-driven education can encourage student success, but critics have rightly raised important concerns about

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student privacy, security, and autonomy. Some of the risks of using student data can include:

- Security breaches of student data, such as financial records;

- Discriminating against historically marginalized groups, such as students of color or LGBTQI students;

- Encouraging a student to drop out because the data predicts they won't succeed; and

- Using student data to limit a student's choices about what program they may study.

Best Practices

Educational institutions should adopt a thoughtful approach to collecting and using student data. This list of best practices is intended as a starting point for institutions to develop their own policies and procedures regarding student data. Institutions should:

Be transparent about why student data is being collected and used. Trust is important to the success of any student data system. Educational institutions should clearly communicate what student data is collected, how it is being used, and why the collection is necessary. Students should be informed so they may make informed choices. Part of this process should include developing and actively managing a communications plan for fielding students' questions about data.

Minimize data collection. Some in today's big data culture may adopt the view that "the more data, the better." While collecting as much student data as possible may reveal insights, resist that urge to collect and retain data without a plan. Educational institutions must be intentional about how student information is collected and minimize the collection and retention of student data when possible. Minimizing the data collected can reduce the potential harm from a breach or unauthorized access university systems.

Know the scope of what student personally identifiable information (PII) is collected and manage it at an enterprise level. Educational institutions have multiple offices working to achieve a diverse set of goals. Student data collection and use can often be siloed, leading to a lack of institutional awareness of how student data is being used across the campus. In order to ensure student data is protected and data collection, use, or sharing complies with the law, institutions should proactively monitor what student data is collected and how it is being used and shared.

Establish a data governance plan and oversight board to manage student data collection and use. Educational institutions should ensure that they create a strong plan for the effective use and protection of student information. Establishing a data governance plan defining data rules and an oversight board to ensure compliance supports proper student data stewardship. Data use governance plans are often products of a single administrative or technology-based office. Educational institutions interested in effective, ethical, and safe student data uses need to seek input from all stakeholders who will provide or use this data.

Ensure data quality, accuracy, and security through regular self-evaluations and audits. Student data governance plans are useless if they are not being followed. Regular evaluations and audits help educational institutions to track how data is being collected, used, and shared; these tools also help colleges correct any inappropriate student data practices.

Adopt reasonable and protective data security measures. Today's headlines are filled with stories of data breaches and theft. Any system holding sensitive data needs to include measures to prevent data from falling into the wrong hands. Security should be a priority for educational institutions and reevaluated on a regular basis to include solutions to new threats as technology improves.

Manage your third-party vendors and control their access to data. Institutions use a variety of technology solutions for everything from financial aid to registration, which means that vendors may have access to a wide range of student data. As part of the acquisition process, contracts or terms of service should be reviewed to ensure compliance with FERPA, GDPR, and applicable state laws.

Build an institutional culture of student data awareness. Proper student data use is only as effective as its weakest link. In order for student data to be used in a safe and ethical manner, institutions must build a culture of data awareness among staff, faculty, leadership, and students. This culture should include training, resources, and support services and personnel.

Recognize and proactively work against student discrimination risks. Student data use must be monitored for both intentional and unintentional discriminatory decisions that affect students. This means that any predictive analytics or historical models used to make decisions should be tested to ensure they are not having a disproportionate impact on traditionally marginalized students. The data used reflects the society from which it is collected; it cannot be assumed that because a decision is "backed" by data that the decision is unbiased.