Anticipating Data Privacy in the Student Data Warehouse:
THREE QUESTIONS FOR REFLECTION

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Action Item

Since the widespread adoption of learning management systems and the implementation of the Integrated Post-Secondary Data System requirements in the mid-1990s, institutions have (in some cases unintentionally) been building what education technology expert Ben Williamson calls "the invisible architecture of datafication" of campus life.1 This collection of people, practices, and technologies that facilitate the movement of data about students and their behaviors is also referred to as the student data warehouse (SDW). Each new technology that an institution connects to the SDW increases the potential for data extraction and use but also for the violation of individual students' privacy. Unlike a physical warehouse, where comings and goings are closely monitored, the virtual nature of the data warehouse makes it easy for an individual's data assets to be shared or disclosed with little informed participation by the individual.

Three reflective questions can guide collaborative governance activities by allowing institutional agents to anticipate the privacy concerns raised by data-collecting technologies connected to the SDW:

If the institution incorporates a new technology, is it transparent to users, particularly to students?

Institutions cannot expect individuals to make informed decisions about how and when to use a technology if the individuals do not understand how the tool works and what information it might collect. Creating clear and concise documentation for campus tools (and requiring that technology partners do the same) is an important first step.

Do individuals have the opportunity to control data collection and storage?

Technologies that collect data indiscriminately and then store that data indefinitely should raise serious concerns about surveillance of students, what control students have over their representations, and students' individual right to be forgotten. Allowing students (and other campus stakeholders) to make informed decisions about what they share, with whom, and for how long ensures that representations in the SDW reflect the needs and beliefs of students.

If individuals cannot make decisions about data collection and storage, what is the rationale for constraining individual autonomy?

In some instances, it might be necessary to collect and store data about students, faculty, or staff without their direct input. For example, federal reporting requirements, accreditation processes, or licensing programs might require institutions to store specific kinds of data indefinitely. Institutions should make the rationale and purpose of their data collection activities clear to their stakeholders. Recent efforts such as Vanderbilt University's Data Governance Framework and the University of Michigan's Data Governance Charter reflect decision-making guidance that makes institutional efforts clear and transparent.

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1 B. Williamson, *The Hidden Architecture of Higher Education: Building a Big Data Infrastructure for the 'Smarter University,'* International Journal of Educational Technology in Higher Education (2018), 15 (1): 1–26.

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