



The UK Quality Code for Higher Education - Advice and Guidance



Sector-Agreed Principle 4
- Using data to inform and
evaluate quality

September 2026



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About this Guidance

Context

This Advice and Guidance supports the [UK Quality Code](#) for Higher Education (Quality Code) and is designed to unpack Sector-Agreed Principle 4 - Using data to inform and evaluate quality and the Key Practices that sit under it. It has been produced by QAA in partnership with a writing group of sector experts and peer-reviewed by colleagues across UK higher education. This is in accordance with the ethos that the Quality Code remains a sector-agreed reference point, built on a shared understanding of what providers can expect of themselves and each other in the assurance and enhancement of quality and the maintenance of standards across post-secondary education throughout the UK. QAA would like to thank the writing group and peer readers for their invaluable contribution in developing this guidance. Details of the writing and reading groups can be found on [page 95](#) of this guidance.

An important contextual note relates to the diversity of higher education providers in the UK. Providers can be large universities, operating with significant infrastructure, or small specialist providers, operating on a significantly smaller scale, or any number of other different operating models. The Advice and Guidance is designed to be useful for all providers (and representatives from a range of providers formed the writing and peer review groups), but we recognise that, on occasion, the nomenclature used could suggest a larger provider's context. It is important that each reader interprets the Advice and Guidance in the context of their own operating environment and that all readers recognise that quality and homogeneity are not synonymous.

Scope

This Advice and Guidance encourages providers to reflect on their practice and processes in relation to the Sector-Agreed Principle. Following the Advice and Guidance is not mandatory, but illustrative of approaches that can help providers meet the relevant Principle. National regulators and QAA do not view the information in the Advice and Guidance as compliance indicators. This guidance does not interpret statutory requirements.

The language we use

Where the word 'should' (or any other similarly directive language) appears in the Advice and Guidance this represents a shared understanding within the UK higher education community. On some occasions an institution can align with the Sector-Agreed Principle in a range of different ways, and in such cases an institution may have a different approach to that set out here. Ultimately, to be aligned with the Quality Code, an institution must be able to demonstrate how it meets the Sector-Agreed Principles in practice. No provider or individual should feel that the Advice and Guidance is prescriptive or impinges their autonomy or freedoms.

Structure

In response to sector demand, the Advice and Guidance aligns directly with the overarching Sector-Agreed Principles to provide clear navigation between the different elements. The guidance begins by unpacking the Principle in an operational context. It is then divided into subsections focusing on each Key Practice outlining practical considerations and approaches for providers to benchmark their own way of working. This features practical tips and experience shared by providers on operational practice. Finally, in each subsection there are tools to enable reflection on the guidance. These tools offer the opportunity to explore what 'good' might look like through reflective questions and practical scenarios that enable interrogation of current practice with a view to enhancing quality.

Commonly used terms

The following terms are used throughout this advice. Other terms which benefit from a precise definition are listed at the end of this document.

- **Students:** refers to all individuals studying towards a higher-level award regardless of demographic, mode of delivery, level of study, subject area, or geographic location.
- **Provider:** describes all types of organisations that provide higher level learning, including universities, colleges, institutes of learning, and employers. We also use 'institution' in some instances where 'provider' might not suit the context.
- **Student representative body:** a formal body or mechanism that represents and promotes the interests of students. This may be known as a students' union, a students' association, or guild, or by another bespoke name where these specific organisations do not exist.

Throughout this guidance the term 'data' is used in its broadest sense, to cover the wide variety often utilised for informing and evaluating quality of provision across the UK. The table on page 5 outlines the different types of data, what they comprise, or how they can be used.

Raw data Unprocessed, original information collected through systems, surveys and databases	
• Student records • Attendance logs • Admissions records • Online learning platforms • Surveys • Staff records • Financial records • Alumni records	
Statistics The systematic collection and analysis of data related to students, staff and providers	
Student data analysis	• Tracking student numbers by level of study, mode of study, subject area • Tracking student numbers in relation to gender, ethnicity, nationality, disability or support needs
Performance metrics	• Graduation rates (across all levels) • Student progression/continuation (year to year) • Employment/graduate outcomes
Sector monitoring	• Staff employment and qualifications • Institutional finances • Research performance • Competitor analysis
Policy support	• Evidence the success (or otherwise) of key policy areas such as widening participation, disability support, equality, diversity and inclusion policies International
Regulatory reporting	• Comparing provider-level performance • Compliance with regulatory thresholds for evaluating quality of provision
Information/interpretation/narrative The inference or conclusions drawn from the statistics	
• Assessment and evaluation of quality of provision - decision for intervention/drive improvements at module/programme/institution/sector/policy • Registration with regulators • Competitor analysis • Student dashboards to predict success/performance • Setting targets for recruitment, retention and success • Governors/board/committee reporting • Prospective student information	



Sector-Agreed Principle 4 and its Key Practices

Providers collect, analyse and utilise qualitative and quantitative data at provider, departmental, programme and module levels. These analyses inform decision - making with the aim of enhancing practices and processes relating to teaching, learning and the wider student experience.

Key Practices

- a. A consistent, coherent and evidence-informed strategic approach to the collection, storage and management of data is employed across the provider. The provider makes explicit the type and level of data utilised (such as departmental, programme, module level) and the policies and processes that underpin its use in the maintenance of academic standards and the assurance and enhancement of quality.
- b. Staff and students are aware of the types of data gathered and how it is stored and used in the management of quality and standards.
- c. When designing and operating monitoring and evaluation arrangements, staff and students adhere to ethical and data protection requirements relating to gathering and submitting data for national data sets, regulatory purposes, and internal monitoring and evaluation.
- d. Staff who are required to collect, manipulate and analyse data for reporting, quality assurance and enhancement purposes receive training that enables them to undertake these activities effectively, ethically and securely. Policies cover any third-party use of data, including applications utilising Generative Artificial Intelligence.
- e. Providers in partnership arrangements (including the student representative body, where applicable) ensure data sharing agreements and reporting requirements are clearly stated, understood and reviewed periodically.
- f. Data is collected and analysed in ways that enable providers to understand and respond to the needs of their student populations, promoting equality, diversity and inclusion, and environmental sustainability.



Principle 4 - Using data to inform and evaluate quality

Providers collect, analyse and utilise qualitative and quantitative data at provider, departmental, programme and module levels. These analyses inform decision-making with the aim of enhancing practices and processes relating to teaching, learning and the wider student experience.

This Principle emphasises the importance of not only collecting data but also evaluating its impact. It recognises that collecting data and implementing change alone is insufficient; providers are encouraged to reflect on those changes and consider the difference they have made.

Evaluating impact involves considering what has improved and why, what has remained the same, and what may need to change again. This reflective process should inform better decision making and lead to improved outcomes over time. It does not require formal evaluation reports or complex processes; rather, it can be straightforward and embedded within everyday practice. In doing so, it supports colleagues to continually develop their practice and enhance student learning and the wider experience.

Providers take different approaches to their use of data in quality assurance and enhancement depending on their size and context. Effective evaluation is proportionate, transparent, context sensitive, and supports reflection on impact and future priorities.



Building a learning culture around the use of data

Providers are reminded that much of the data used within quality processes is already being collected and used to support administrative and operational activity across the institution. To support learning and understanding, it may be beneficial to clearly identify and communicate the types of data being used to inform and evaluate quality and where it is held, such as:

- the **raw data** that exists in systems (such as student records systems)
- the **statistics** that are derived from that raw data (such as continuation and attainment)
- the **information/interpretation/narrative** that is inferred from the statistics (programme-level data dashboard or student dashboards).

Planning and designing data collection

When thinking about the collection of data to inform and evaluate quality, providers might consider:

- thinking about evaluation at the start of any new action or project
- building monitoring and evaluation into regular review and planning processes, rather than treating them as separate activities added on afterwards
- being clear about what success would look like before implementing a change
- whether the data collected or used is sufficient to complete the task or answer specific questions
- how decisions about data collection influence what can be meaningfully evaluated, including any limitations on the interpretation of impact
- their own context, recognising that approaches that work for a small specialist provider may differ from those that are effective in a larger provider.

Collecting, analysing and interpreting data

Providers might also consider:

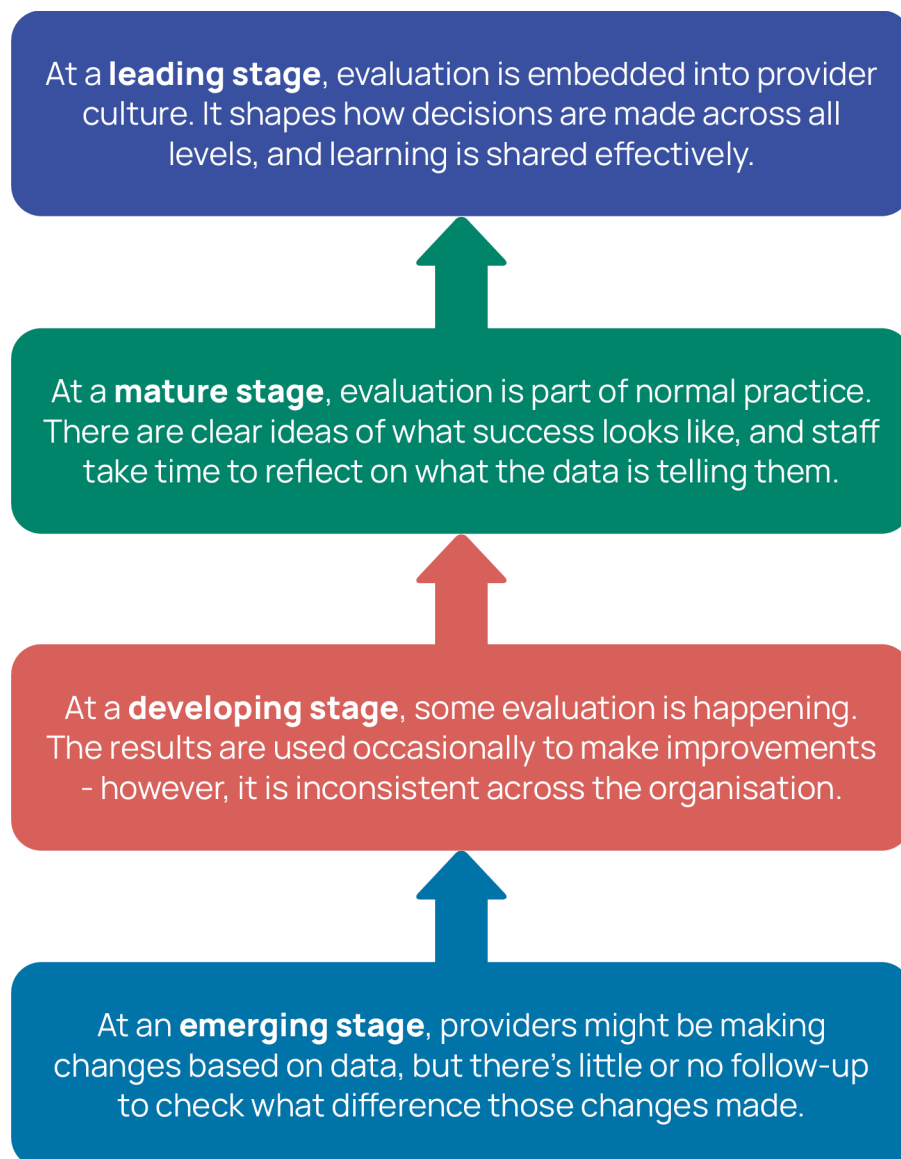
- using both quantitative and qualitative evidence, recognising that numerical data is important, but so too are student and staff feedback and lived experiences
- ensuring the fair and ethical collection, analysis and use of data and its findings
- the support required for staff to feel confident using data, enabling curious conversations and providing a basis for enhancement.

Communicating findings and taking action

When sharing and acting on findings, providers might consider:

- being careful not to overclaim; just because something improved does not mean it was caused by the data-informed intervention
- communicating findings clearly and acting on them where possible, while explaining any delays or barriers to action
- using findings to inform future decisions, improvements and ongoing evaluation activities.

Figure 1: outlines a simple scale that can be used to evaluate a provider's progress towards the effective use of data to inform and evaluate quality. This isn't about scoring performance or ranking, but a tool to aid reflection on current practice and potential next steps.





Key Practice a - Strategic approach to the collection, storage and management of data

Key Practice a

Strategic approach to the collection, storage and management of data

A consistent, coherent and evidence-informed strategic approach to the collection, storage and management of data is employed across the provider. The provider makes explicit the type and level of data utilised (such as departmental, programme, module level) and the policies and processes that underpin its use in the maintenance of academic standards and the assurance and enhancement of quality.

Developing a strategic approach to data

A strategic approach to data management is fundamental to informing a provider-wide understanding of quality and supporting continuous enhancement. This is embedded as a shared strategic priority, with clear leadership, governance and accountability structures to ensure data is effectively owned, managed and used across the organisation.

A strategic and proactive approach to the use of data, both as an early indicator of risk and as a measure of success and impact, enables institutions to define robust indicators and thresholds. This supports effective assurance of academic standards, systematic monitoring of educational quality, and the targeted prioritisation of enhancement activity where it will deliver the greatest institutional benefit.

To support the effective implementation of a strategic approach to data, providers may also wish to establish a cross institution data steering group or equivalent governance function. This group can provide oversight of institutional data use, support coordination across academic and professional services, and ensure that data already held by the provider is effectively shared, interpreted and used before additional data collection is undertaken.

Such a group may support data mapping activity to identify duplication, gaps and under used data sources, helping to minimise unnecessary data collection while maximising the value of both quantitative and qualitative data already available. The steering group may also act as a mechanism for addressing barriers to access and use, supporting proportionate, ethical and transparent data sharing in line with institutional priorities and regulatory requirements.

Defining data use across an institution

Clearly defining the type and level of data used across a provider at institutional, departmental, programme, or modular level, and underpinning it with a transparent data strategy enables consistent engagement across all areas of provision. In doing so, it helps ensure coherence in practice and alignment with institutional strategic objectives.

Recognising that the use of data for quality assurance and the maintenance of standards is often influenced by external regulation, providers are encouraged to align their data strategy with institutional priorities that support meaningful insight, alongside compliance obligations. This ensures that providers remain responsive to regulatory requirements while shaping data use in ways that reflect their specific context and strategic priorities.

Effective implementation of a data strategy requires ongoing commitment and regular review.

Implementation will involve:

- making data accessible
- ensuring staff understand how to access and engage with it
- defining and embedding clear responsibilities to support confident and consistent use across the institution
- regular review to help keep the strategy effective, aligned with institutional priorities, and being responsive to evolving needs.

Data purpose

When developing an approach to data acquisition (as distinct from collection) and analysis providers may wish to view data as a lens for inquiry rather than a source of definitive answers. Its primary value is to help providers understand what questions to ask about institutional performance. The goal is to better understand the real-world situation through the data and to support decision making and action, rather than relying on the data to define the situation itself.

Providers should consider how the data being collected serves clear and defined purposes and how it directly supports institutional quality assurance and enables enhancement activities and interventions. The data collected should be directly linked to institutional priorities, objectives and regulatory requirements, where relevant. Providers may wish to consider how the data collected directly informs institutional decisions in relation to policy development, resource allocation and quality enhancement initiatives. Providers are encouraged to regularly test whether their data is fit for purpose by evaluating how effectively it supports these decision-making processes.

Data requirements for quality and standards

Effective quality assurance begins with clarity about what institutions need to measure and where that information will come from. By identifying key questions about standards and performance first, institutions can then work backwards to determine which data sources offer the necessary insight, recognising that this raw data can be drawn from existing data warehouses (see [terminology](#)).

Agreeing a consistent set of indicators in advance offers a shared reference point for analysing and interpreting data. When used in combination with other sources of evidence, these indicators can help shape meaningful discussion about standards and quality. A comprehensive approach draws on multiple interconnected data domains, each offering distinct perspectives on institutional performance and student success.

The table below sets out some broad categories of quality-related data and the types of insight they can provide. This data may also highlight where additional support for specific student groups or characteristics is needed (see [Key Practice f](#)). Institutions may wish to consider which combinations of data (for example, raw data, statistics or insight) will best address their specific quality enhancement priorities and strategic objectives.

Table 1: Commonly used data for quality assurance and enhancement and the maintenance of standards across all provision

Data type	What this data can tell you	Examples
Recruitment and admissions data	Measures the effectiveness of recruitment and conversion of applicants into enrolled students. Supports planning for teaching, student support services, and provides a baseline for monitoring retention and progression.	• Demographic profile of incoming students; declared disabilities or support needs; entry qualifications and grades; application, offer and enrolment data. • Admission and retention data used by funders and regulators.
Academic performance data	Indicates how effectively students are achieving learning outcomes, identifies where academic support may be required, highlights trends in attainment, and evaluates the effectiveness of teaching and assessment strategies.	• Assessment results; pass rates; progression and retention rates; completion rates; degree classifications. • Attainment and progression data used by funders and regulators.
Student experience and engagement data	Evaluates student satisfaction with learning and support services, measures engagement with studies, and identifies areas where additional support or improvements may be needed.	• Student satisfaction surveys; module and programme evaluations; attendance records; virtual learning environment (VLE) engagement; use of academic support and mitigation processes.

Continued ...

Data type	What this data can tell you	Examples
External and sector data	Provides external assurance of academic quality and standards and enables comparison with sector benchmarks and professional expectations.	• External examiner reports; Professional, statutory and regulatory body (PSRB) accreditation reports; quality assurance outcomes; sector benchmark comparisons.
Student feedback data	Provides direct insight into students' views on learning and teaching, identifies emerging issues, and informs enhancements to teaching, learning resources, and institutional responsiveness.	• Course representative feedback; staff-student committee minutes; focus groups; complaints; academic appeals.
Graduate outcomes data	Assesses the longer-term impact of programmes on graduate employability, further study, and career development.	• Graduate Outcomes Survey results; employment rates; further study destinations; alumni feedback; employer feedback. This data can also be used by funders and regulators.

Data quality and trust

Providers may also wish to view data as a lens for inquiry rather than a source of definitive answers. It is useful to consider that data quality is fundamentally about trust rather than absolute correctness, not inherently right or wrong but is either trusted or not for the intended purpose. A useful description to consider is that data itself does not 'speak' - we give it a voice through our analysis and interpretation and that is where issues of trust typically emerge.

Providers should consider that by the time data is analysed, it has often been manipulated multiple times and is compromised when compared to the real-world situation it seeks to capture. To establish trust in the data provided, providers are advised to consider how supporting documentation can establish data trust and to provide guidance that outlines internal audit cycles, accuracy checking procedures, to include cross-system validation (where relevant), data verification practices and error detection and correction processes.

It is important to establish consistency, clarity and comparability in data use across the institution, enabling more reliable and accessible insights and strengthening the effectiveness of data-informed decision making. Providers may consider the impact of operational systems, such as those used to manage student records, learning platforms or finance, on data quality and should seek to establish a single source of trust to be used as the definitive record for institutional decisions.

Governance mechanisms, such as data steering groups, can play an important role in supporting trust by agreeing common definitions, reviewing data quality concerns, and ensuring that data is interpreted consistently and proportionately across the provider.

To achieve this, providers may wish to consider establishing governance frameworks that include:

- provider-wide standards for measuring key metrics
- common data definitions and measurements
- standardised data collection methods to ensure data consistency across the provider.

While not every provider will have fully developed these capabilities, it is recognised that this represents best practice and providers should aim to work towards these standards.

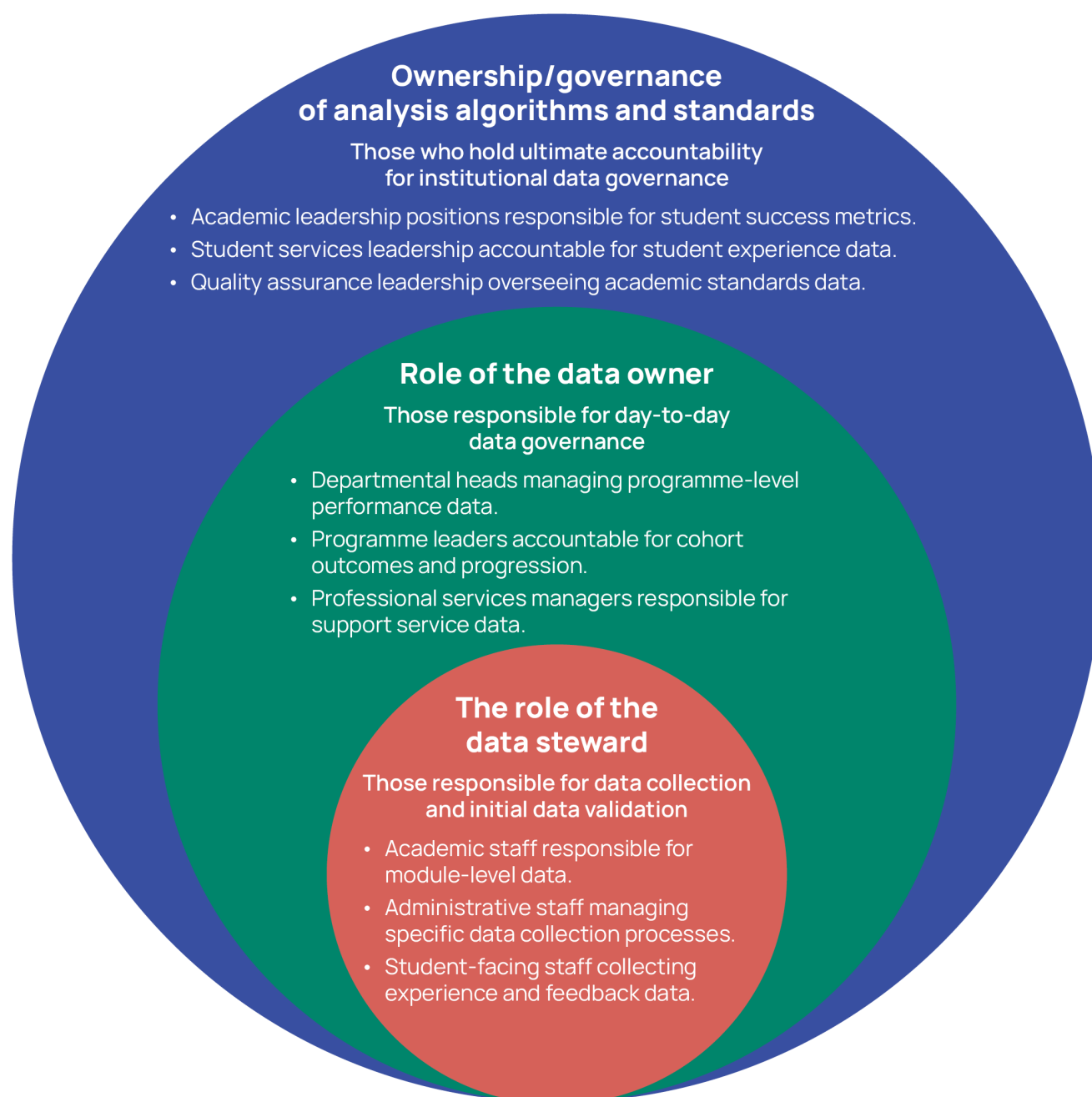


Data ownership

Providers are encouraged to consider their structure and scale when defining data ownership responsibilities and should ensure that ownership of each category of data is clearly articulated (see [Key Practices c, d and e](#)). Providers may wish to consider how they might establish clear points of authority and accountability, potentially supported by a comprehensive register of data assets that identifies ownership across the institution. Oversight of ownership arrangements may sit with or be supported by a cross-institution data steering group or equivalent body.

Data ownership is multidimensional, involving several key stakeholders within the institution. Providers may consider delineating responsibilities at strategic, operational and individual levels.

Figure 2: How data ownership and responsibilities of key stakeholders may be organised across a provider



The use of data into policies and procedures

As part of the strategic approach to managing data, providers are advised to ensure that it is included in existing institutional policies and procedures and incorporated into training (see [Key Practice d](#)).

By building robust data management practice into everyday working, the consideration of data to inform quality assurance and enhancement activities will become standard practice. This in turn will drive decision making across all levels of the provider and represents a significant step to building data integrity and consistency across an institution. It may be prudent to undertake a wide-scale review of centralised policies, to ensure an informed and consistent steer in how local-level practices are considered and adapted.

Externality and sector benchmarking

As part of their strategic approach, providers may consider developing comprehensive frameworks for sector benchmarking that contextualise institutional performance within the broader educational landscape through independent verification. However, providers should remain mindful of the limitations of sector-level data, recognising that standardised data models may not fully capture the diversity of providers or reflect differing institutional contexts across the sector.

Providers are encouraged to take a broad view of data within their strategy, recognising that external feedback can be a valuable internal data source. External examiner feedback, employer assessments, and professional accreditation outcomes offer valuable external peer perspectives that providers can integrate into their quality enhancement processes. Providers are reminded to recognise the importance of the systematic collection and analysis of both quantitative and qualitative data and establish mechanisms that capture the value of professional judgement alongside numerical metrics.

In the current landscape it is important to consider the development of comprehensive data strategies that translate sector positioning data and performance comparisons into informed decision-making tools. Establishing regular review cycles and building analytical tools to transform external validation from compliance activity into data can demonstrate a commitment to enhancing the quality of educational provision.

Implementing and reviewing a data strategy

An effective data strategy enables providers to consider how they use the data available to them to fulfil their strategic goals. The strategic value of data lies in the ability to take insights, communicate them, and develop impactful actions. Providers are advised to consider how the implementation of their data strategy and ongoing commitment across all levels can underpin this process.

The data strategy should be kept under regular review to assess its impact on quality assurance and enhancement activities, and to enable feedback loops to inform continuous improvement. These evaluations shape future strategic approaches to data usage that remain effective and responsive to evolving needs.

Figure 3: Questions for providers to consider when developing, implementing or reviewing a data strategy



Operationalising the data strategy

Providers may consider what software, platforms or other technical tools may best support the operationalisation of their data strategy as they consider institutional needs, capacities, and aspirations. Providers may also reflect on the accessibility of different levels or types of data to staff and may debate whether using technical tools to grant different access for specific groups could maximise the conversion of insights into actions at different levels.

Providers may also explore how and when data is presented to those working with it. A more narrow, consistent approach may suit specific purposes or types of data, while more flexible, open-ended approaches could enable creativity and enterprise, potentially facilitating data-literate staff to uncover previously hidden insights. However, some providers may feel that this leads to too much variation in practice.

Providers should reflect on the impact that timeliness and quality of data has on staff ability to generate effective actions. Instant or live data can enable greater responsiveness, but that may not always be possible to achieve or add value, whereas retrospective data can delay or limit providers' ability to take meaningful action but usually has a higher level of accuracy.

Data literacy

As part of the development and implementation of an effective data strategy, it is important that providers consider the data literacy and confidence levels among their staff, as it is often unevenly distributed across institutions. This can be explicitly addressed through the strategy by making clear the types of data being collected, the purposes of data collection, and expectations for how data will be used to identify risks and support enhancement, including the use of performance indicators. Embedding clear roles and responsibilities in relation to data supports greater understanding among those staff expected to engage with it and can help target training and development to those who need it most. See [Key Practice d](#) for further information on training staff to effectively engage with data.

Alignment to monitoring and evaluation activity

Providers are reminded to align their strategy for managing data to their approach to monitoring, evaluation and enhancement (see [Principle 5 - Monitoring, evaluating and enhancing provision](#)) to ensure ongoing relevance and to enable the continuous and cyclical monitoring of provision and the impacts of enhancement work. This alignment may also inform the approach to regularly reviewing and enhancing the provider's data strategy.

Reflective questions

1. Does our institution have a clearly articulated data strategy that aligns with the broader mission and priorities? What is the process for checking this?
2. How is data governance structured at our institution, and how effectively does it support quality assurance and enhancement?
3. What decisions or interventions will the data collected inform? What specific quality assurance questions will the data being collected help us explore?
4. How does the data collected directly support enhancement objectives?
5. What mechanisms are in place to evaluate the impact of data use on quality assurance and enhancement?
6. How are data findings and data-informed decisions communicated to different stakeholder groups (for example, academic staff, students, governing bodies)?
7. How can expertise that is often concentrated in planning and quality teams be better shared and mobilised across our institution to ensure that all staff using data are enabled to engage effectively with it?

Scenarios

Scenario 1: Addressing data use challenges through the development and dissemination of a data strategy

Context

A provider collects a wide range of data on student outcomes and student experience, along with other metrics relating to institutional performance on a regular, cyclical basis each year. Some of this data collection is driven by statutory reporting requirements; however, the data is also used to write reports on specific aspects of institutional performance that are periodically submitted for consideration at various committees. It is often the case though that these reports do not lead to meaningful actions, much to the frustration of the staff who write them.

In many cases, they have been prepared in response to ad hoc requests from members of senior management or to highlight concerns held by staff working in the quality assurance team. There is sometimes duplication of work with different teams looking at the same issue from different perspectives or even using different datasets. There are also frequent requests from committees for more data to be collected or for further analysis to be carried out before conclusive decisions can be reached.

To address these recurrent issues and ensure that the provider is making the best use of the data it collects, a working group is formed to lead on the development of a new data strategy. The group comprises representatives from the provider's senior management, IT team, student records team, planning team, and quality assurance team, as well as other key stakeholders. The working group reports through relevant committees to the provider's governing body, which has overall oversight of the strategy.

The working group undertakes a review of current practices, processes and policies relating to the collection and use of data, considers institutional circumstances and priorities, as well as external regulatory requirements, carries out wider sector research and engagement, and consults with stakeholders from across the provider. Based on this work, a strategy is drafted and taken through the provider's policy approval process.

The new data strategy covers core considerations, including the collection, storage and management of data, the allocation of ownership and accountability for different types of data, sets out expectations for how data should be used and reported on, and outlines how the strategy will be operationalised, communicated and kept under review. The strategy also includes information on how the provider will meet statutory obligations in relation to handling data and is informed by the provider's national regulatory framework.

Considerations

- What were the risks for this institution in failing to develop and agree a new data strategy?
- How might a new, coherent data strategy enable the provider to address the concerns and challenges identified in the first part of this scenario, and what potential benefits could it bring?
- How might you adapt the process described above to fit your own institutional context to aid in developing a new data strategy or refreshing an existing one? What colleagues or teams may need to input into the process, and what factors need consideration in relation to your institution's circumstances and priorities?

Scenario 2: Building trust in data through a clear data strategy

Context

At a mid-sized university, the introduction of a new data dashboard to support quality assurance was met with scepticism from academic staff. While the system offered rich data on key metrics such as student attainment, progression and engagement, users questioned its accuracy, struggled to interpret what it meant in practice, and were concerned it could be used for punitive reasons rather than as a tool for enhancement.

In response, the university recognised that trust in data needed to be strategically developed, not assumed. Senior leadership made it an explicit priority to build confidence in the principles and purposes behind data alongside improvements to the technical infrastructure.

A cross-functional group of academic staff, quality experts and data specialists was set up to lead a collaborative review of the dashboard. This group ensured that indicators were robust, clearly defined and aligned with academic processes. Contextual guidance was developed for each data set to explain what the data showed, what it did not show, and how it should be used in the context of programme review or quality enhancement.

The provider's approach was underpinned by a clear data governance strategy, which set out expectations for how data would be defined, validated and used in decision making at all levels. This strategy helped standardise the types and levels of data employed and provided a shared language and structure that made discussions about data more coherent and constructive. It also clarified roles and responsibilities in maintaining data quality and using it for enhancement purposes.

By positioning the dashboard within this strategic framework, the provider was able to reframe it as a starting point for dialogue and curiosity that can enable enhancement rather than a final verdict on performance. Staff were encouraged to reflect on questions such as, 'what might explain this trend?' rather than 'why are we being judged on this metric?' and to offer contextual narrative to the metrics. Ultimately, the reframing created space for more open and constructive conversations about quality and enhancement.

Opportunities for local validation of data were embedded into the annual monitoring process. This was an opportunity for teams to check data integrity, annotate anomalies (such as a temporary change to assessment methods), and contribute to the ongoing refinement of the dashboard. This part of the collaborative process was an important strategic mechanism to ensure that the dashboard was not viewed as a static, top-down system, but as a living resource shaped by those who used it, reinforcing the idea that use of data to inform quality and standards was a shared institutional responsibility.

Over time, confidence in the dashboard grew, and staff reported feeling more engaged in using data to enhance student outcomes. Rather than fearing judgement, they saw value in identifying patterns, sharing good practice and prompting change. As a result, the provider strengthened its culture of evidence-informed quality enhancement, through shared ownership and strategic clarity.

Considerations

- What does this highlight about the importance of having, and following, a clear data strategy to support consistent and confident use of data to inform quality and standards?
- How did embedding opportunities for local data validation help build trust in the dashboard?
- In what ways did positioning the data as a starting point for inquiry support more constructive engagement with quality processes?



Key Practice b -
Awareness of the types
of data gathered and how
it is stored and used

Key Practice b

Awareness of the types of data gathered and how it is stored and used

Staff and students are aware of the types of data gathered and how it is stored and used in the management of quality and standards.

In the context of managing quality and standards, awareness of the use of data goes beyond passive receipt of information. It means that staff and students have a shared and proportionate understanding of what data is collected, why it is collected, how it is used to inform decisions, and what safeguards are in place to protect individuals. Awareness should enable staff and students to engage confidently with data, ask informed questions, and understand how data contributes to quality assurance, enhancement and the maintenance of standards.

Staff and students are increasingly aware of the need to use qualitative and quantitative data to ensure that initiatives and interventions relating to teaching, learning and the wider student experience are evidence-based and at least data-informed, if not data-driven.

Students are often surprised by the level of meticulous detail with which providers collect and use data to support quality assurance, enhancement and the maintenance of academic standards. This reaction highlights the importance of ensuring that all members of the academic community not only have an awareness of data practices but also share a clear understanding of how data is collected, stored and used, including the safeguards in place to protect it.

It is equally important to recognise that both staff and students may gather, maintain and curate their own datasets, sometimes in ways that do not align with institutional expectations or comply with relevant legislation (such as the [UK General Data Protection Regulation \(UK GDPR\)](#), the [Data Protection Act \(2018\)](#), or the [Data \(Use and Access\) Act \(2025\)](#)). Such unregulated approaches to data management can have far-reaching consequences, including regulatory investigation, financial penalties, reputational damage and legal risk.

Providers may find it helpful to articulate proportionate expectations of awareness for different groups.

For example:

- staff need to understand what data they can use locally, how it aligns with institutional datasets, and where to seek advice when handling or interpreting data
- staff with leadership or governance responsibilities should understand how data is aggregated, assured and used to inform decision making at provider level
- students and student representative bodies should understand what data is collected about the student experience, how it informs enhancement activity, and how to access and interpret relevant outputs.

Setting clear, role-appropriate expectations can support consistency and reduce anxiety or misunderstanding about the use of data.

Building trust

Those with responsibility for managing data are advised to maintain robust relationships with colleagues across their institution to safeguard against the risks associated with data collection that might not align to institutional approaches. Building trust fosters a culture in which staff and students feel comfortable to ask questions about data, raise concerns about interpretation, and challenge assumptions without fear of blame or reprisal. Encouraging open dialogue about uncertainty, limitations and context can help ensure data is used responsibly and constructively in managing quality and standards. Establishing a central point of contact that staff, student representative bodies and students can access for advice and guidance about the collection, management or manipulation of data will be beneficial.

As set out in [Key Practice d](#), training on data protection can assist colleagues to understand and recognise the importance of storing and analysing data in a manner that mitigates making data subjects identifiable or breaches regulatory requirements. However, it is worth recognising that even the most effective training cannot guarantee institution-wide implementation of the approach to the appropriate and secure use of data for quality enhancement and maintenance of standards. Providers will need to assure themselves that key stakeholders across their institution are using data of all types appropriately through regular communication and review.

Communication about the collection and management of data

As set out in [Key Practice a](#), the provider approach to managing data for quality assurance and enhancement will be underpinned by clear policies on data retention and usage that are kept current. It is essential that any changes to the policies are regularly and clearly communicated (as applicable) to staff, students and other stakeholders such as partner organisations. This can help minimise the risk of unauthorised data collections that do not align with the agreed strategic approach (see [Key Practices a, c, d and e](#)) and will help to raise and maintain awareness about the use of data across a provider.

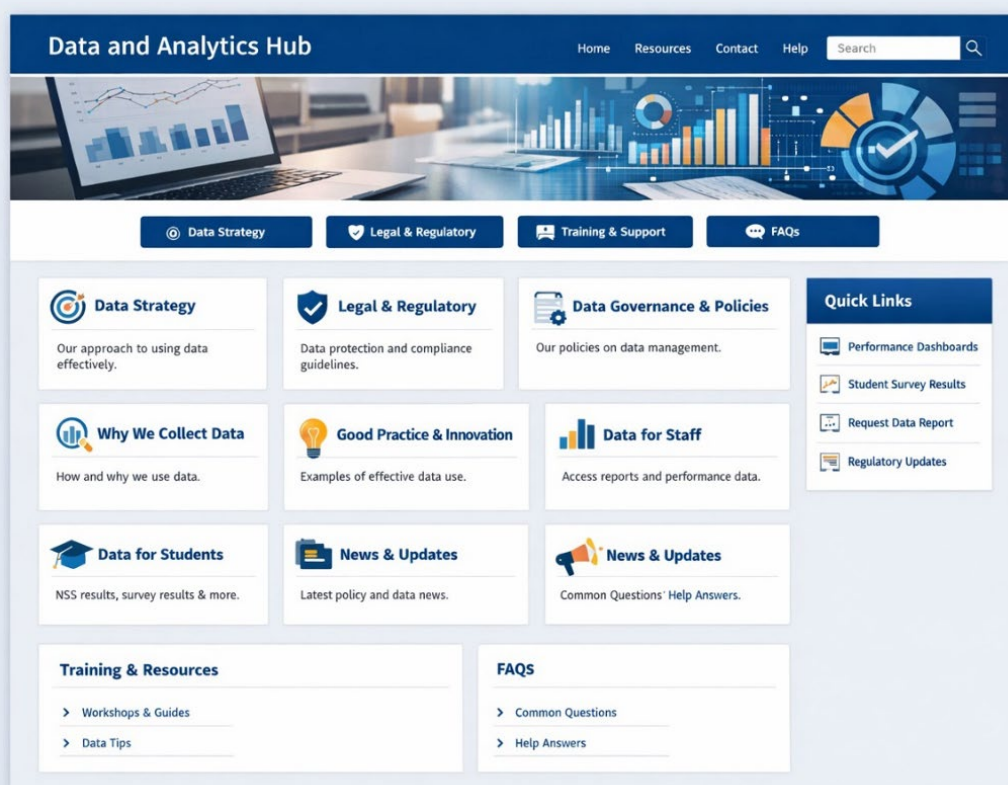
Regular communication about innovations and good practice in the use of data, alongside information about updated policies or rules around its collection, management and storage will help to ensure a current and widespread understanding of expectations of staff, students and any other stakeholders who have access to view or manipulate those data.

A 'single source of truth', such as a dedicated intranet page, could be developed, such as a secure data resource hub for all data users. It might house core information about the collection, storage manipulation and analysis of data across the provider, including relevant policies and procedures.

Such a resource might helpfully include:

- the strategic approach and aims for using data across the provider
- legal requirements and regulatory information about data use
- purposes for data being collected
- underpinning policies about the collection, storage, manipulation and analysis of data
- examples of innovative and good practice in using data
- information for staff to view data pertinent to their programmes/service area such as staff surveys
- information for students and their representative bodies (for example students' unions) to view data pertinent to them, such as National Student Survey (NSS) scores and results of internal student surveys
- latest news to impart information about policy, regulatory changes
- access training resources and top tips
- frequently asked questions (FAQs).

Figure 4: Example of a dedicated data resources intranet page



Reviewing the mechanisms for raising and maintaining awareness about the use of data

Providers are advised to consider how and when they review their mechanisms for raising and maintaining awareness about the management and use of data and how this is reported. The following methods might be used for reviewing the impact of communication mechanisms and gathering information about the effectiveness of mechanisms of expectations around the collection and use of data across a provider. In reviewing these mechanisms, providers should consider not only levels of engagement, but also evidence of understanding, confidence and trust in the use of data.

- Focus groups to explore perceptions of data use and trust (staff, students and student representative bodies).
- Surveys, including questions to ascertain confidence and understanding.
- Pulse surveys (for ongoing monitoring).
- Online quizzes.
- Working groups.
- Data regarding the use of any dedicated intranet pages.
- Review of feedback on the training provided regarding the use of data.
- Reviewing changes in requirements to the regulatory landscape and benchmarking practice.
- Review against agreed benchmarks for success / areas of improvement.



Table 2: Example of how a provider may review and evidence progress against agreed benchmarks for success in using data for quality assurance, enhancement and the maintenance of standards

Evidence of data being used to enhance academic quality in departments/faculties

RAG status			
 Red	 Amber	 Green	
Evidence / data used	Findings / impact	Areas for improvement	Examples of good practice
Annual monitoring reports, NSS, module evaluations, progression and attainment data, external examiner reports	Data informs curriculum review and annual monitoring; actions tracked through committees	Increase consistency of data use across all departments	Departmental dashboards used in annual review meetings to monitor student outcomes
Lead/owner: Dean/Head of Department			

Student representative body using data to improve advice services

RAG status			
 Red	 Amber	 Green	
Evidence / data used	Findings / impact	Areas for improvement	Examples of good practice
Student surveys, SU reports, complaints, engagement data, focus groups	Student feedback shapes support priorities and service improvements	Improve sharing of institutional data with student representatives	Joint staff-student action plans reviewed each semester
Lead/owner: Students' Union/Student Services			

Comprehensive quality reports for governing bodies backed up by clear and accessible data

RAG status			
 Red	 Amber	 Green	
Evidence / data used	Findings / impact	Areas for improvement	Examples of good practice
Institutional dashboards, KPIs, quality reports, Graduate Outcomes, TEF/NSS data	Governing body receives evidence-based assurance on quality and standards	Develop more accessible visual dashboards and trend analysis	Interactive Power BI dashboards with narrative commentary
Lead/owner: Academic Registry			

Responsibility and ownership taken for verifying local data to enable narrative to add context to hard data

RAG status			
 Red	 Amber	 Green	
Evidence / data used	Findings / impact	Areas for improvement	Examples of good practice
Faculty data validation reports, committee papers, local quality reports	Faculties validate performance data before reporting, providing contextual explanations	Standardise data validation processes across faculties	Annual faculty data verification exercise before reporting
Lead/owner: Faculty Quality Leads			

Identification of areas of risk such as recruitment, retention and outcomes that result in useful conversations for improvement

RAG status			
Red	 Amber	 Green	
Evidence / data used	Findings / impact	Areas for improvement	Examples of good practice
Recruitment, continuation, attainment, completion, Graduate Outcomes, student engagement data	Early identification of at-risk programmes enables timely intervention	Expand predictive analytics and early warning systems	Risk dashboards reviewed monthly by faculty management teams
Lead/owner: PVC Education / Faculty Leadership			

Reduced resource required for regulatory reporting

RAG status			
Red	 Amber	 Green	
Evidence / data used	Findings / impact	Areas for improvement	Examples of good practice
Automated reports, business intelligence tools, HESA/Regulator returns, data warehouse	Reduced manual effort and improved reporting accuracy	Increase automation and reduce duplicate reporting	Self-service dashboards replacing manual spreadsheet reporting
Lead/owner: Planning and Data Team			

Reflective questions

1. How do we know that our staff and students have a shared understanding of the types of qualitative and quantitative data collected and analysed at institutional, programme and module level?
2. What evidence do we have that this understanding goes beyond awareness of existence to confidence in interpretation and use?
3. How are students and student representative bodies supported to interpret, question and use data meaningfully in quality assurance and enhancement activities?
4. To what extent do students understand how their feedback and data influences decisions and improvements, rather than simply being collected?
5. How do we reassure staff and students that, in managing quality and standards, we will always comply with all relevant regulatory requirements, and that data will not be linked to identify students?
6. How do we review and evolve our programme monitoring and enhancement processes to make the best use of all available qualitative and quantitative data while safeguarding data security?
7. How do we communicate the steps taken to safeguard data security and mitigate the risk that in applying filters to analyse qualitative or quantitative data, it might become possible to infer a specific student (or students) to whom those data relate?
8. How might we use generative artificial intelligence tools to assist in the analyses of complex data in a way that informs management of quality and standards while still ensuring the security of those data sets?
9. How do we build and maintain understanding, confidence and a trusting relationship between the staff and student members of our community, such that we can use data for both quality assurance and enhancement in a way that doesn't generate foreseeable and avoidable anxiety around using individually identifiable student data for any other purpose?
10. How can we have confidence that all colleagues have the same understanding of the agreed institutional approach to data collection, storage and usage to enhancing practices and processes relating to teaching, learning and the wider student experience?
11. What measures are we taking to develop a culture whereby all staff and students appreciate the importance of consistency in collecting, storing and analysing data, both in evidencing quality and standards and in informing further enhancements?

12. How do we keep the data being collected, stored and analysed under review to further support management and enhancement at provider, programme and module level?
13. How can we improve the mechanisms put in place to ensure that all staff and students are aware, and share a common understanding, of the institutional approach to data collection, storage and use with the aim of enhancing practices and processes relating to teaching, learning and the wider student experience?

Scenarios

Scenario 1: Using data safely for improving teaching and learning

Context

It has come to your attention that a new lecturer has collected results from a module evaluation survey, undertaken their own analyses of both the quantitative results and free text comments using generative artificial intelligence, and plans to use these data insights to enhance their module for next year.

The colleague took up post in your department 12 months ago. For their first year in post, they were allocated a single module to organise and deliver. This lecturer, who is very enthusiastic, has a strong statistical background and believes fervently in the power of data to enhance modules and programmes.

After their module completes, your colleague surveys the eight students who completed the module using a bespoke survey (to which only five students respond). The lecturer analyses the quantitative results using Excel and then uses ChatGPT to analyse the free text comments.

Considerations

- How do the actions of this colleague relate to the institutional policy on the collection, storage and analysis of data to manage quality and standards?
- How might you make the colleague aware of the existing institutional policy relating to the collection, storage and usage of provider, programme and module data?
- What risks would there be in simply informing the colleague that they haven't followed a policy that was agreed and put in place prior to their arrival at your institution?
- Are there any concerns beyond alignment to institutional policy in the data analysis conducted, in good faith, by your colleague? Isn't all data analysis to enhance the student experience valid and helpful?

Scenario 2: The 'invisible' quality audit

Context

A department has recently introduced an automated Quality Dashboard to help members of the senior management team monitor the health of various degree programmes. This system draws data from a variety of sources, including how quickly lecturers return feedback on assessments, student login frequency on the virtual learning environment (VLE), and even the 'sentiment' of student emails using an AI-driven tool that flags frustrated or angry language.

The students are completely unaware that this system exists. They believe that their emails to personal tutors are private conversations and that their VLE activity is simply for their own learning. However, the department is already using these metrics to inform major decisions, such as reallocating teaching staff or changing the format of exams for the following year, without consulting the students about the data being used to justify those changes.

Considerations

- To what extent can senior leaders draw valid conclusions from data when students were unaware that their behaviour and communications were being collected and analysed for quality monitoring? How might students' lack of awareness affect the interpretation, legitimacy or ethical use of those data?
- If an algorithm indicates that a programme is 'high quality' but students report negative experiences through surveys or student representatives, which evidence should carry greater weight in decision making, and why?
- What reservations might you have that students aren't aware of what data are being used to assess 'standards' or to inform other quality activities?
- What might be the consequences were students to become aware that data about their behaviour was being collected, analysed and used to drive strategic decisions without their knowledge or express consent?



Key Practice c - Ethical data collection for monitoring, reporting and evaluation

Key Practice c

Ethical data collection for monitoring, reporting and evaluation

When designing and operating monitoring and evaluation arrangements, staff and students adhere to ethical and data protection requirements relating to gathering and submitting data for national data sets, regulatory purposes, and internal monitoring and evaluation.

Providers are reminded that data should be used with a clear purpose and careful consideration given to how it is collected, analysed and applied. Data protection officers within providers can offer advice and guidance on the ethical considerations and data protection requirements of using data. Adhering to these requirements in monitoring and evaluation of quality is not solely a matter of compliance; it supports a coherent and integrated approach that protects individuals and strengthens confidence in how providers manage and use data (see also [Key Practices a](#) and [b](#)).

Table 3 on page 37 outlines key datasets used to assure and enhance quality, and to maintain standards. These may relate to government statistical returns, external regulatory requirements, or internal monitoring and evaluation processes.

Reporting requirements vary across the four UK nations. The examples below are illustrative and are not intended to provide an exhaustive list of all statutory or regulatory data collections. Institutions should comply with the requirements of the funding, regulatory and statutory bodies applicable to their jurisdiction.

Table 3: Key datasets used to assure and enhance quality, and to maintain standards

Data category	Description/ examples	Primary recipient(s)	UK applicability
Recruitment and enrolment data	Data collected throughout the applicant journey to support admissions, planning and reporting. Examples include enquiries, applications, offers, acceptances, enrolments, widening participation indicators and applicant demographics. Data may also be submitted to admissions services (eg UCAS) and incorporated into statutory returns.	Internal: Admissions and recruitment teams, academic schools/departments, planning and student records teams, senior management and governance committees External: UCAS, Higher Education Statistics Agency (HESA), National funding and regulatory bodies	UK-wide
Student record data	Student-level data, including enrolments, qualifications, progression, completion and protected characteristics (eg sex, ethnicity, disability, age).	Internal: Student records team, planning registry, quality assurance, business intelligence External: HESA and national regulatory bodies and funders via statutory returns	UK-wide
Funding and student number returns	Returns used to inform funding allocations and student number monitoring. Examples include the Higher Education Students Early Statistics (HESES) survey in England and equivalent returns in the devolved nations, where applicable.	National funding and regulatory bodies (Office for Students (England), Scottish Funding Council (Scotland), Medr (Wales), Department for the Economy (Northern Ireland)).	Nation-specific

Continued ...

Data category	Description/ examples	Primary recipient(s)	UK applicability
Student and graduate satisfaction surveys	Data collected to administer sector-wide surveys (eg NSS and Graduate Outcomes). Survey results are used to evaluate the student experience and graduate outcomes, identify areas for enhancement, support quality assurance, contribute to sector benchmarking and league tables, and inform strategic planning and reputation management.	Internal: Quality assurance and enhancement teams, academic schools/ faculties, senior management and governing bodies External: HESA for NSS and Graduate Outcomes Survey; published results are used by prospective students, sector bodies and league table providers	UK-wide (where applicable)
Transnational education (TNE) data	Monitoring the scale and location of overseas provision. Supporting statutory reporting and official statistics. Informing institutional strategic planning and international partnerships. Supporting sector-wide analysis by UK government and regulatory bodies.	Internal: Institutional planning and international teams, senior management External: HESA, regulatory and funding bodies via statutory returns	UK-wide
Further education and apprenticeship data	Data relating to funded apprenticeships and other further education provision. Includes the Individualised Learner Record (ILR) which operates across the UK nations.	Internal: Partners involved in the delivery of the apprenticeship External: Government education departments in the individual nations	Nation-specific

Data category	Description/ examples	Primary recipient(s)	UK applicability
Regulatory and professional reporting	Data submitted to government departments and professional, statutory and regulatory bodies (PSRBs), including student numbers, equality monitoring data, retention, attainment, progression and graduate outcomes. Any other information required for professional registration or statutory purposes.	Internal: Senior management, governance/committees, academic teams as appropriate External: Government departments and accrediting PSRBs	UK-wide (requirements vary)
Internal monitoring and evaluation	Monitor student outcomes and the student experience. Identify risks and opportunities for enhancement. Support quality assurance and regulatory compliance. Inform strategic planning and resource allocation. Monitor equality, access, continuation, completion and graduate outcomes. Includes student feedback, academic performance, external examiner reports, complaints, appeals, student casework, recruitment and admissions data.	Internal: Academic schools and faculties, quality assurance and enhancement teams, student services, planning and business intelligence teams, senior management, and governing bodies/committees	Institution-specific

Continued ...

Legal responsibility

The guidance below demonstrates how legal obligations, ethical practice, and practical safeguards combine to ensure that staff and students can participate in monitoring and evaluation activities securely and responsibly. Establishing clear roles and governance arrangements, supported by plain, consistent and easily understood terminology helps to define accountability. Embedding principles of inclusivity and fairness ensures that data practices not only minimise potential harm but also actively promote equity and build trust.

Providers need to be confident that they comply with the legal requirements that govern the use of personal information in the UK, namely the [UK General Data Protection Regulation \(UKGDPR\)](#) and the [Data Protection Act \(2018\)](#). These state:

Anyone responsible for using personal data must make sure the information is:

- used fairly, lawfully and transparently
- used for specified, explicit purposes
- used in a way that is adequate, relevant and limited to only what is necessary
- accurate and, where necessary, kept up to date
- kept for no longer than is necessary
- handled in a way that ensures appropriate security, including protection against unlawful or unauthorised processing, access, loss, destruction or damage' ([Data protection: The UK's data protection legislation - GOV.UK](#)).

According to the legislation, people also have rights with respect to their personal data, including to:

- 'be informed about how [their] data is being used
- access personal data
- have incorrect data updated
- have data erased
- stop or restrict the processing of [their] data
- data portability (allowing [them] to get and reuse [their] data for different services)
- object to how [their] data is processed in certain circumstances.'

There are also legal rights to consider when using personal data for:

- automated decision-making processes (without human involvement)
- profiling, for example to predict your behaviour or interests', such as for student applications, marking or predicting student success.

In practice, this means that providers need to implement safeguards to protect data throughout its lifecycle from collection to disposal.

These include:

- **Only collecting the data needed**

Before collecting any information, check that it is necessary for the purpose intended. Do not gather personal details (for example, free school meal status) if they are not directly relevant to the analysis or activity.

- **Using aggregated data wherever possible**

Work with data at a higher level (such as Programme or Faculty) instead of individual-level data to reduce the risk of identifying specific students.

- **Protecting individuals in small datasets**

When dealing with small numbers, take extra care to prevent identification. Apply techniques such as rounding or suppressing values, following recognised guidance (for example, HESA standards).

- **Anonymising or pseudonymising data**

Remove or disguise identifying details so individuals cannot be recognised. This might include removing names or replacing them with codes or scrambled values to prevent records being linked back to specific students.

- **Ensuring secure storage and transfer of data**

Put appropriate safeguards in place to protect data at all times, including encrypting data during transfer. This is especially important when using third-party or cloud-based platforms (such as survey tools, analytics platforms, or AI tools), where additional risks may arise.

- **Using trusted third-party services**

Check that any external platforms meet your organisation's data protection and security standards before using them, and ensure appropriate agreements are in place.

- **Maintaining clear retention and deletion policies**

Have documented policies that explain how long data is kept and when it is deleted. These should meet regulatory requirements (including those from PSRBs) while avoiding keeping data longer than necessary.

- **Enabling individuals to exercise their data rights**

Provide clear, accessible processes for staff and students to access, correct or request deletion of their data, in line with data protection laws.

Regulatory responsibility

Providers are responsible for meeting the data requirements of their national regulators within the legal frameworks set out above, ensuring the accuracy of data. Providers need to ensure the data they submit is internally verified before submission to avoid additional resource being used to correct data upon queries from regulators.

Providers are advised to plan verification into workloads to check for:

- **completeness** - for example, data exists where it should exist
- **validity** -for example, it conforms to specification - a date in the specified format
- **accuracy** - is the data correct, for example has a mark been entered correctly
- **consistency/integrity** -for example, a person's age cannot be 200, a UG student studying 120 credits in a year on a course cannot be part-time.

Some examples of common areas of inaccuracy that need to be internally verified prior to submission might include:

- course enrolled on with start date
- postcode
- date of birth
- gender
- assessment marks
- class of degree
- award title.

Ethical use of data

When collecting and using data for quality assurance and enhancement activities, providers may consider going beyond statutory compliance by adopting ethical practices that help build a culture of trust (see Key Practice b). A key element of this is transparency: providers need to clearly communicate to staff and students what data is being collected, why it is needed, how it will be used, and who it may be shared with. Where data collection extends beyond legal or regulatory requirements, for example, to inform strategy or business improvement, and involves methods such as surveys or focus groups, providers are required to obtain informed consent from participants.

It is important that any approach safeguards individual rights while reinforcing confidence in the integrity of quality assurance activity. Hence, data should always be collected proportionately, limited to what is necessary and relevant, and handled in ways that avoid misuse, misinterpretation, or the perception of overly intrusive data collection.

Ethical data practices are more effective where students and staff are involved not only as data subjects, but as contributors to decisions about how data is collected, interpreted and used. This supports transparency and a common understanding, and confidence in the integrity of monitoring and evaluation activity.

Providers are reminded that there should be a clear and transparent process by which data users and/or subjects can challenge or complain about unethical use of data.

Inclusivity and fairness

As outlined in the advice and guidance underpinning [Principle 5 - Monitoring, evaluating, and enhancing provision, Key Practice f](#), providers are encouraged to design monitoring and evaluation processes that promote inclusivity and avoid disadvantaging specific groups of students or staff. These processes should also align and support the provider's strategic aims relating to equality, diversity and inclusion.

Most providers have equality and diversity teams or specialists who can assist with developing equality impact assessments to help identify risks and ensure data practices actively support equality, diversity, and inclusion. Colleagues who have responsibility for developing data frameworks and data sets are advised to work with these teams/ specialists to ensure the use of data in monitoring and evaluation adheres to the legal frameworks, regulatory requirements and strategic direction.

Core considerations for equality, diversity and inclusion when working with data for monitoring and evaluation can be found in the [Inclusive Education Framework - Structures and Processes](#) (QAA, Collaborative Enhancement Project, 2023).

- Routine quality assurance processes report on inclusivity issues and metrics, and systemic issues identified are addressed as appropriate.
- Staff can easily access and understand information on demographics of students in terms of widening participation (for example, ethnicity, mature students, disability, TUNDRA, the Index of Multiple Deprivation (IMD) for Higher Level participation).
- Data are provided to staff relating to university targets around inclusivity (for example, awarding gaps, retention). Staff are supported to interpret the data and take data-informed actions.
- By communicating openly about how data is used to improve learning, teaching and student support, institutions can foster trust and demonstrate that ethical considerations are central to their approach.



Table 4: Core considerations around roles and responsibilities for the ethical use and data protection requirements when gathering and submitting data

Consideration	Providers will...
Ensuring clarity of roles and responsibilities	Explicitly define the roles and responsibilities related to data protection
Identification of accountable person/people	Identify accountable individuals, such as the Data Protection Officer or a designated data governance team
Communicating awareness of duties	Providers ensure all staff and students involved in monitoring and evaluation understand their data-related duties.
Delivery of and undertaking training	Providers offer training to develop competence in handling data ethically and securely. Mandate the completion of training at regular intervals.
Student representation	Providers ensure student representatives engaged in quality processes receive training and guidance on the appropriate and ethical data use

Internal governance and oversight

Data ethics and protection need to be embedded within broader governance frameworks. This could involve exercising oversight through committees or boards that regularly review data practices, particularly where sensitive information is involved. Providers may also consider establishing data ethics committees or equivalent mechanisms to scrutinise the use of learning analytics, predictive modelling, or AI-driven tools, ensuring that decisions about data are both transparent and accountable.

In addition, providers should seek assurance that appropriate processes for data use, ethics and security are implemented and that participants are compliant with agreed procedures. This can be done through internal and external third-party audit.

Partnerships and third-party data use

Providers are reminded that data sharing with partners or third parties is to be governed by clear, formal agreements that set out responsibilities, standards and review processes (as set out in the advice and guidance underpinning [Principle 8 - Operating partnerships with other organisations, Key Practices a, c and d](#)).

Care should be taken where data crosses borders (for example, overseas campuses), or where new technologies such as generative artificial intelligence or analytics platforms are used that may be hosted and maintained overseas. As part of their due diligence activity, providers are encouraged to verify that partners apply equivalent levels of security and ethical oversight. In addition, agreements should be reviewed regularly ([Principle 8, Key Practice c](#)) to reflect changes in practice or regulation. Providers will also need to be aware of and comply with regulations around the use of data in other countries they work in ([see Principle 8, Key Practice d](#)).

Reflective questions

1. How do we ensure our monitoring and evaluation activities comply with UKGDPR and Data Protection Act (2018) requirements?
2. How transparent are we with students and staff about what data is collected, why, and how we plan to use it?
3. What mechanisms do we use to balance our routine reporting practices with minimising unnecessary data collection?
4. What safeguards do we have in place to ensure data is anonymised or pseudonymised appropriately (for example, where there are small numbers of identifiable students)?
5. How do we assure ourselves that the day-to-day practices of partnerships and third-party providers (for example, student analytics, module surveys) handle data ethically and securely beyond what is written in a contract?
6. How do we train our staff and students to handle data legally and ethically? How do we know that this knowledge is retained and put into practice?
7. Are we aware of other provider policies and practices which could support effective, ethical and secure data collection, use and analysis?
8. How do we involve students and staff in shaping ethical approaches to monitoring and evaluation, so they feel genuine ownership and trust in the process?
9. In what ways can we use data not only for accountability (for example, module passes, academic progression) but also to proactively identify opportunities to enhance learning, teaching, and well-being?
10. How do we review and update our data protection and ethics practices to keep pace with emerging technologies such as AI, predictive analytics and cross-border data tools?
11. How do we evidence that the data we collect for monitoring and evaluation arrangements actively promote inclusivity and address structural inequities, rather than simply report on their existence?

Scenarios

Scenario 1: Student module survey data

Context

A provider launches a module survey using a third-party platform. Students raise concerns about anonymity; specifically, they're concerned that academic staff will penalise them in future assessments if they find out who is being critical.

Considerations

- How can we convince students that the data is anonymised and that data security is in place to prevent individual responses from being identified?
- How might we communicate to students that sufficient training and controls are in place to ensure staff are aware of, and act on, their data protection obligations?
- What could we do in future to ensure that students are involved in the design to give confidence in the anonymity of the data?

Scenario 2: Partnership data sharing

Context

A provider delivers a franchised programme overseas and shares administrative and personal data about each student with the partner. During a scheduled review of the arrangement, it is discovered that the partner's system stores data on unsecured local servers.

An urgent intervention is made to ensure that the data are kept securely and a further exercise to delete any known copies of the students' data from the partner's systems.

Considerations

- What might we need to do to ensure that we have a more robust data security processes in place at the point of appointing a partner?
- Beyond security, how will we ensure that the partner is now compliant with UK GDPR standards and any other requirements we have placed on them? Do we need to revisit our Data Sharing Agreement?
- How can we be assured that staff at the partner organisation have been properly trained in matters around data protection?



**Key Practice d -
Training on data
use and third-party
applications (including
Generative Artificial
Intelligence)**

Key Practice d

Training on data use and third-party applications (including Generative Artificial Intelligence)

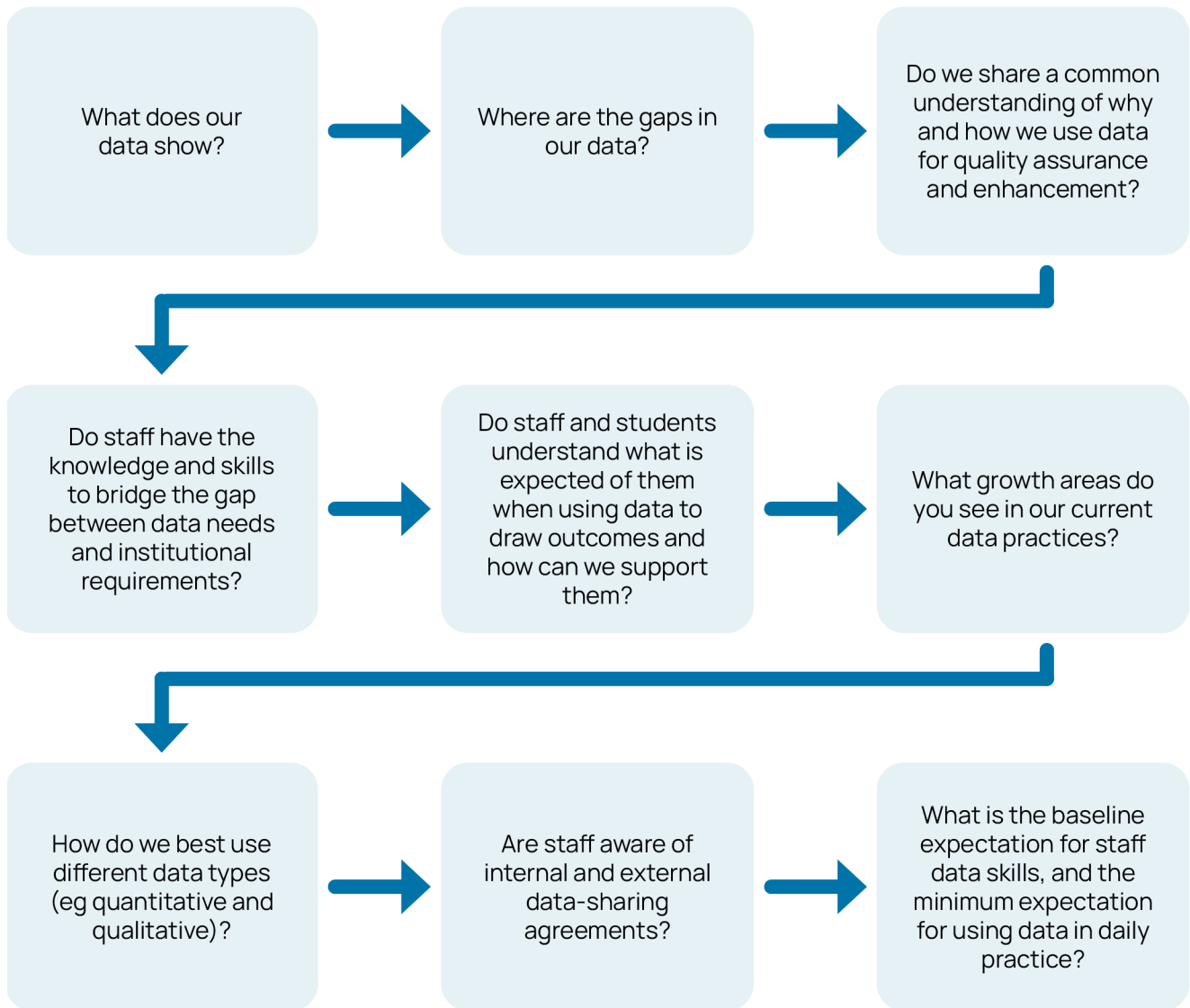
Staff who are required to collect, manipulate and analyse data for reporting, quality assurance and enhancement purposes receive training that enables them to undertake these activities effectively, ethically and securely. Policies cover any third-party use of data, including applications utilising Generative Artificial Intelligence.

The education sector is a diverse landscape, with significant variation in student populations, data availability, strategic priorities and areas of focus. While some data themes may be common across providers, key performance indicators (KPIs) will differ depending on the size, type and context of each institution. It is therefore vital that providers understand their own context and data landscape when determining the baseline knowledge and support required to enable staff to handle data appropriately, develop data literacy, and interpret trends and outcomes effectively.

While the sector has increasingly adopted data-informed approaches, the extent to which these are embedded in quality assurance and enhancement activities varies. Differences in data availability and staff experience mean that providers will be at different stages of maturity. Providers are encouraged to reflect on their own context when identifying the skills and knowledge needed to collect, manage and analyse data for reporting, quality assurance, and enhancement purposes.

Figure 5 on page 49 illustrates how a provider might reflect on their own context to establish where there is a skills/knowledge gap and subsequent training needs across a provider and can be used in conjunction with Figure 1 to evaluate a provider's progress towards the effective use of data to inform and evaluate quality.

Figure 5: Establishing skills gaps and training needs

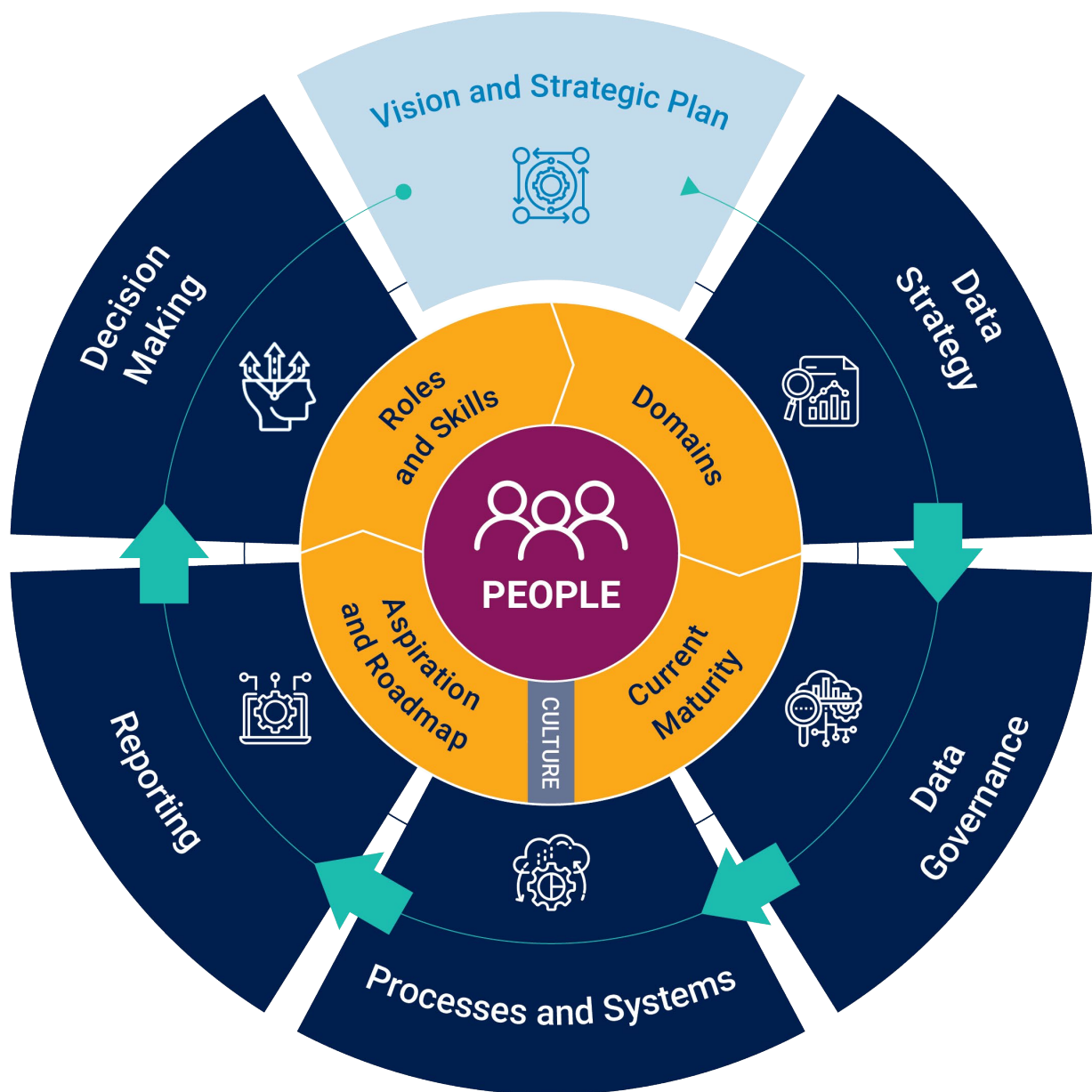


Capability assessment

Providers are advised to assess the capability of staff across their organisation before determining the level and type of training to be offered to individual staff involved in data handling. This assessment and approach to training might be incorporated into the institution's overall approach to data strategy, governance and processes.

The [Data Maturity Framework](#) (Jisc, 2024) offers a practical approach to thinking about how data is used across an organisation. It supports providers in establishing, enhancing and embedding effective engagement with data, and encourages a structured approach to data management. This includes defining accountability and responsibility for data, identifying clear points within the data cycle to review progress, reflect on changes made, and plan improvements in a systematic and sustainable way.

Figure 6: The Data Maturity Framework (Jisc 2024)



Data literacy

A 'one size fits all' approach to data analysis is unlikely to be effective, and providers are advised to not assume a consistent level of expertise in data handling across their organisation (Ghodoosi, Torrisi-Steele, West, and Heidari, 2024). Levels of data exposure and understanding vary; therefore, the context in which data is collected, managed and analysed should be embedded within any training or data-related activity.

Providers should assess the data literacy ([see terminology](#)) of individuals before expecting them to engage with data or draw conclusions from it. Literacy and experience will differ across and within stakeholder groups across an institution, and responsibility for handling data does not guarantee a consistent level of knowledge or approach. This needs to be considered when developing and communicating institutional strategies for data collection, management and storage ([see Key Practice a](#)). Establishing a clear, shared definition of data literacy will support providers in assessing it and identifying development training needs across the organisation. A range of support should be offered to create clear pathways for building data knowledge and skills.

When developing data skills to inform and evaluate provision, the use of clear and familiar terminology is key to success. Providers are encouraged to invest time in building shared understanding, knowledge and confidence, enabling staff to engage consistently and effectively in data-informed/driven activities. Although this requires sustained effort, developing a data-literate workforce will support a more robust and assured data-informed future for the organisation.



Table 5: Non-exhaustive list of considerations to inform content when developing training for specific roles across a provider

Role	Typical data handling responsibilities	Training needs	Additional considerations
Across the provider	Data handling responsibilities vary across all staff groups.	• Establish a common baseline of data literacy • Cover effective, ethical and secure data collection handling and analysis • Explain organisational approaches to data handling • Communicate relevant policies, procedures, legal and regulatory requirements • Explain how data handling aligns with other institutional policies, including Generative AI • Demonstrate how data analysis informs risk-based decision making • Explain the purpose and value of stakeholder involvement in data activities	• Do not assume prior data literacy at any level • Support staff with different levels of expertise and experience • Define what successful training looks like and how ongoing development will be supported

Role	Typical data handling responsibilities	Training needs	Additional considerations
Programme coordinators, administrators, student services, professional services and support staff (PSS)	Support departmental data collection, handling and reporting. Undertake data handling and, in some cases, analysis for academic colleagues.	• Develop skills in collecting, handling and presenting data • Tailor training to departmental responsibilities • Build understanding of qualitative and quantitative data • Explain data sharing agreements where applicable	• Do not assume previous data experience is transferable between contexts or data types • Avoid assumptions about existing knowledge of data presentation • Some staff may have little previous experience of handling institutional data
Academic staff (including programme leaders)	Interpret institutional data, often through dashboards, to inform learning, teaching and enhancement activities.	• Develop confidence interpreting institutional data • Understand expectations for evidence-informed decision making • Understand mechanisms for accessing and interpreting institutional data • Embed robust quantitative and qualitative data practices • Work effectively with student representatives when interpreting data	• Researchers and experienced colleagues may support those with less experience of research methods or data analysis • Consider how data use leads to measurable improvements in academic practice

Role	Typical data handling responsibilities	Training needs	Additional considerations
Academic leaders (deans, heads of department/ area)	Interpret institutional data and dashboards to support operational and strategic decision making.	• Champion effective, ethical and secure data use • Monitor and evaluate the impact of decisions informed by data • Use data trends to identify and manage institutional risk	• Lead by example in embedding good data culture across academic areas
Senior leaders (executive)	Receive internal and external reports produced by academic and professional services colleagues to support institutional decision making.	• Use robust evidence to inform strategic decisions • Understand governance, policies, procedures and institutional strategies relating to data • Understand the implications of third-party systems and Generative AI when handling institutional data • Apply data-informed approaches to institutional risk management	• Do not assume existing data literacy, regardless of seniority

Role	Typical data handling responsibilities	Training needs	Additional considerations
Governors	Receive internal and external reports summarising institutional performance and strategic activity.	• Interpret institutional performance data appropriately • Understand how data supports strategic oversight and assurance • Use evidence to evaluate institutional performance and risk	• Avoid applying assumptions or benchmarks from external organisations where these differ from provider context • Recognise potential bias when interpreting institutional data
Student representative bodies and student representatives	Collect, interpret and present student data to influence institutional enhancement.	• Build confidence in collecting and presenting robust evidence • Understand how data can support effective change and co-creation with the provider • Understand data sharing agreements. Understand policies, procedures and legal/regulatory requirements • Ensure appropriate access to institutional data where representatives contribute to enhancement activities	• Consider confidence in student-generated datasets • Recognise where student representative bodies require separate data governance arrangements because they operate independently of the provider

Role	Typical data handling responsibilities	Training needs	Additional considerations
External providers (eg placement providers, collaborative partners, PSRBs)	Share data with the provider or receive provider data in accordance with agreed data sharing arrangements.	• Understand data sharing agreements and responsibilities • Apply secure data management practices • Maintain confidentiality • Ensure consistency and alignment in reporting • Access any technological training required to support data exchange	• Avoid incorrect interpretation of small datasets, including issues such as double counting or identification of individuals from low reporting numbers • Ensure reporting aligns with provider definitions, standards and agreed parameters

Considerations for policies and procedures around third-party applications

Providers should have a coherent **policy and governance framework** for third-party applications rather than relying solely on technical safeguards. Providers need to be confident that through their policies and procedures, any application handling institutional data is assessed, approved, used and retired consistently across the institution.



Generative artificial intelligence (GenAI) and data management

The rapid growth of Generative artificial intelligence (GenAI) means that providers will be at different stages in developing approaches to adoption and adaption. Policies around the use of GenAI should include references to the use and storage of data.

Providers might wish to consider the following:

- guidance on the use of GenAI to manipulate data
- nuances between external AI sites (for example ChatGPT) vs AI available within an institution (for example Microsoft CoPilot)
- including data security awareness and any parameters of use when using AI to support data analysis
- due diligence in relation to where and how data is stored by AI tools used by a provider.

Future planning will embed regular consideration of the implications of GenAI on data use to ensure an ongoing and active approach is adopted, maintained, and communicated and implemented across a provider.

There is a wealth of resources available to support AI conversations, including the [QAA Generative AI Hub](#) and [Jisc's AI webpages](#). Guidance is also available from [the Information Commissioner's Office on AI and data protection](#), which will align with the [Data \(Use and Access\) Act](#), August 2025.

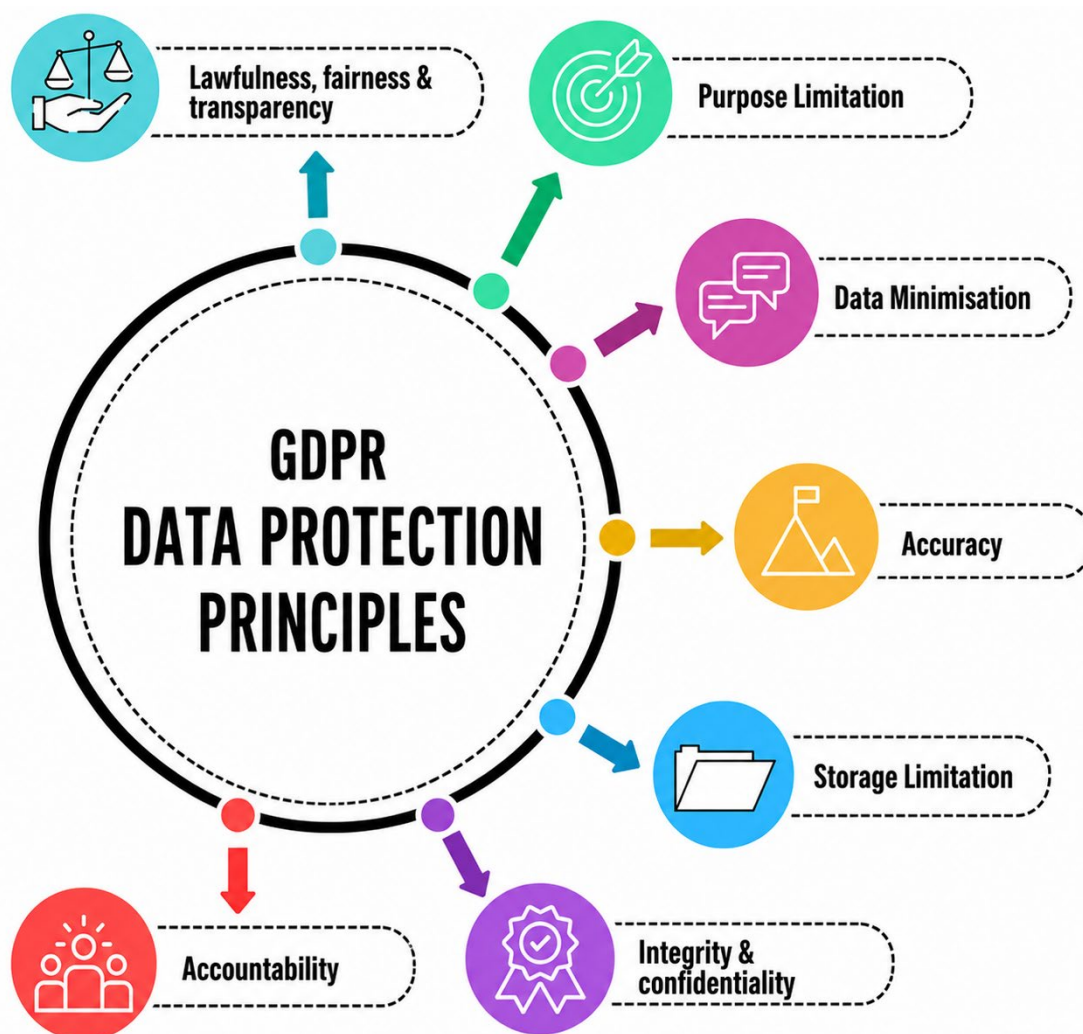
Ethics and legislation

Key Practice c highlights the importance of considering legal and regulatory requirements in the use of data. Providers should ensure that these considerations are clearly reflected in institutional policies and procedures and embedded within staff training. These policies should form the foundation for how data is managed and used, supporting consistent, lawful and ethical practices across the organisation.

A useful starting point for training is to outline the legal requirements set out in the [UK Government's data protection](#) legislation outlining [General Data Protection Regulation \(GDPR\) principles](#) and the [Data Protection Act \(2018\)](#). This legislative and regulatory information define the core requirements for handling and managing data, providing a clear foundation for baseline practices and informing the content of staff training.



Figure 7: Example of how GDPR principles could be presented for training purposes



Referencing ethical considerations around the use of data can be incorporated into training sessions as practice develops. General considerations may include:

- Reasonable assumptions that can/should be made when inferring trends from data sets, how the steps taken to manipulate data in one way or another should be communicated.
- The ethical considerations that must be taken as an institutional standard. There are several reputable sources outlining ethical frameworks that could inform institutional ethical practices, including the [UK Data Service](#), [Statistics Authority](#) and the Office for National Statistics's [Data Ethics Policy](#).
- The level of ethical consideration required should be clearly defined in provider guidance and training and tailored to the responsibilities of different audiences, recognising that ethical requirements will vary according to the nature of the data activity. Providers are encouraged to draw on established institutional policies and authoritative external guidance when developing their approach. A useful starting point is the guidance available from the UK Research and Innovation (UKRI) councils, including the [Economic and Social Research Council \(ESRC\) Framework for Research Ethics](#). These resources provide established principles for ethical research practice and can support providers in developing robust, consistent approaches to the ethical use of data.

Reflective questions

1. What are the benefits of data training for quality assurance and enhancement activities across our provider?
2. What materials and guidance do we need to support effective training prior to, during and following sessions? What format could this training take? How will this training be assured as accessible and understood?
3. How do we know that we have an effective and consistent approach to embedding data, and data training to drive business as usual?
4. What does a baseline of data credibility, consistency and assurance informed by provider reporting requirements look like to the practitioner?
5. What policies, procedures, guidance and strategies need to be in place to ensure consistent approaches to data handling?
6. How do we consider third party and Generative AI use when handling data? How do we know the provider approach to this is widely understood and practiced?
7. What does data-sharing mean to our staff, students and key stakeholders (such as partners)? How is this managed?
8. What terminology needs to be broken down to ensure genuine understanding of data responsibility and collaboration?

Scenarios

Scenario 1: Anomalies in regulatory data sets

Context

A quality team within a new small and specialist provider has been made aware that the regulator has flagged anomalies and areas of risk in the submitted data set. It is thought that the anomalies are due to a rapid expansion in partnership arrangements overseas and within the UK, which has in turn increased their student numbers. Queries have been raised by the regulator about the data received in relation to student numbers and outcomes across the full range of provision.

The quality team has met with their data and analytics team and expressed concern that they do not have the skill set to meet the enhanced requirements of the regulator to be able to unpick the data. Currently, the quality team has responsibility for the final submission of data to the regulator; the data is collected, manipulated and stored by the data and analytics team.

The governing body has also offered feedback that the data visualisations received as part of the quality reports are incomprehensible. Currently, the quality team relies on the data and analytics team for the analysis of raw data and visualisations to back up the narrative within them.

There is a data analytics tool in development, to be rolled out across the provider, but it has so far only been piloted with academic teams.

Considerations

- What are the immediate operational considerations that need to be addressed?
- What are the operational considerations that need to be addressed for future working?
- What are the strategic considerations?
- Where is the reputational risk in this scenario?
- What training might be considered for staff (academics, quality teams, data and analytics team and governors) involved in this scenario?

Scenario 2: Embedding ethical and effective data training across diverse roles

Context

A medium-sized provider has recently refreshed its institutional policies relating to data handling, analytics and the use of Generative AI in quality assurance and enhancement activity. Mandatory online training has been rolled out to staff and student representatives, with high reported completion rates.

However, internal review activity indicates that data continues to be interpreted inconsistently across academic and professional service teams, used cautiously or not at all by some colleagues, and misunderstood by student representatives involved in governance and enhancement activity. Feedback suggests that while training is clear at a policy level, it often feels disconnected from day-to-day practice, particularly where data is complex, sensitive, or drawn from small cohorts.

Senior leaders are seeking assurance not only that training has been completed, but that it is being used effectively, inclusively and consistently to support ethical, secure and meaningful data practice across the provider.

Considerations

- How does the provider ensure that data training is relevant and accessible to staff and students with different roles, responsibilities and levels of data confidence?
- What mechanisms support the practical application of training within routine quality assurance and enhancement activity, rather than reliance on completion of mandatory modules alone?
- How are students and student representatives supported to understand their responsibilities when using institutional data and to engage confidently and ethically in evidence-based discussion and challenge?
- In what ways could scenario-based, peer-led or co-designed approaches be used to embed data expectations across different communities of practice?
- How does the provider evaluate whether training has led to changed behaviour and improved confidence in ethical data use, and how is this used to refine future training and guidance?



Key Practice e - Data sharing agreements and reporting requirements for partnership arrangements

Key Practice e

Data sharing agreements and reporting requirements for partnership arrangements

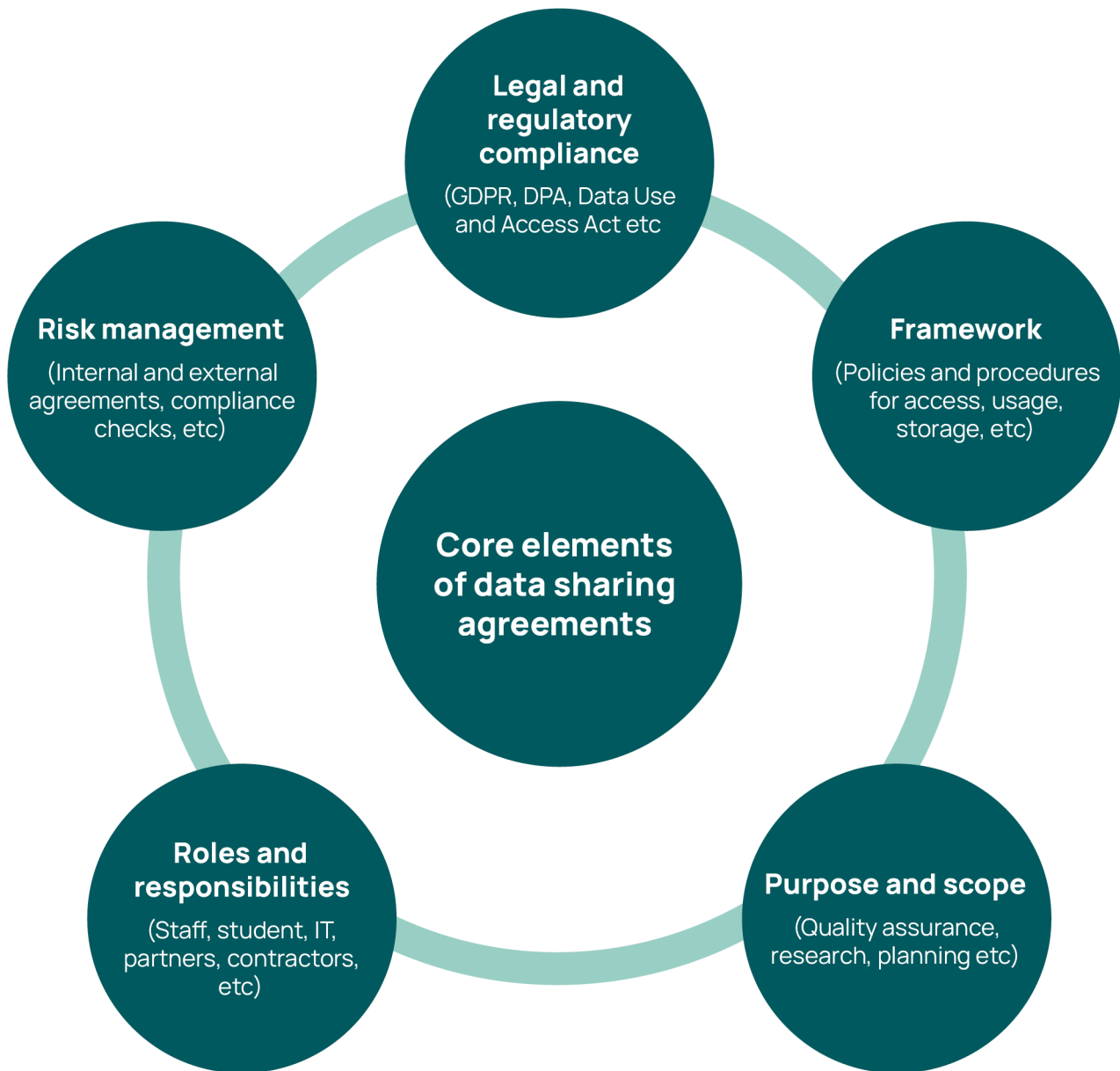
Providers in partnership arrangements (including the student representative body, where applicable) ensure data sharing agreements and reporting requirements are clearly stated, understood and reviewed periodically.

As detailed in [Key Practice a](#), effective strategic approaches to managing quality and standards require providers to establish clear systems for the collection and use of consistent information. This is particularly important in internal and external partnership arrangements to ensure that all parties have a clear understanding of the data that needs to be shared, how it will be used, and the relevant reporting requirements. The governance framework should be comprehensive and transparent to allow for the strategic approach to be implemented across all academic provision, including partnerships.

It will be important to work with data governance officers who will be able to offer advice and guidance and signpost to the provider approaches, policies and practices in regard to setting up data sharing agreements that support quality assurance and enhancement activities.



Figure 8: Core elements of data sharing agreements



Policy for data governance

Effective data governance is critical for all arrangements involving the sharing of data, whether with external partners (commercial, research, regulatory bodies, partner providers) or between internal departments (for example, Registry, Planning, Estates).

A robust policy is essential for governing data sharing that clearly articulates:

- the scope of data to be shared
- the purpose for sharing (for example, quality assurance, reporting)
- the specific reporting requirements for all parties, including those of the partners and student representative body (if applicable).

The policy should enable all stakeholders to understand their obligations and will include a protocol for regular review and updates to maintain relevance and compliance.

Data sharing and reporting requirements

Providers need to adhere to clearly defined rules governing the sharing and reporting of data. These arrangements should be mutually agreed, formally documented, and regularly reviewed to ensure that data subjects are protected, legal obligations are met, and ethical standards are consistently upheld.

Effective governance in this area is essential for legal compliance ([UK GDPR](#), the [Data Protection Act 2018](#), and the [Data Use and Access Act 2025](#)). It also ensures that institutional data is managed securely, proportionately and for clearly defined purposes.

A data sharing agreement (DSA) provides a clear accountability framework and is recognised as good practice by the Information Commissioner's Office (ICO) when personal data is shared between independent data controllers (including joint controllers). It should set out the purpose of the sharing, the roles and responsibilities of each party, the lawful basis for processing, and the safeguards in place to protect the data.

Considerations for data sharing and reporting include:

- defining the purpose of data sharing
- communication and understanding
- proportionate and reliable reporting
- periodic review and assurance
- partnership arrangements
- risk-based documentation
- unconscious data sharing
- working with student representative bodies.

Defining the purpose of data sharing

Providers clearly articulate why data is being shared, what information is required, and how it aligns with the provider's legal data protection duties. This includes specifying what records are kept and shared.

It is important to clearly define and document the specific purpose for sharing data, to ensure that only the minimum necessary information is disclosed (data minimisation). The intended use of the data by the receiving party must also be explicitly stated and recorded, so that the sharing remains lawful, proportionate and limited to what is necessary.

Ensuring clear and comprehensive agreements

Data sharing agreements should be articulated clearly and approved through appropriate governance channels.

Providers are reminded that data sharing agreements should:

- specify the types of data to be shared
- state the frequency of sharing
- outline the format of reports
- define the roles of each party (for example Controller, Joint Controller, or Processor) as per data protection law
- state the corresponding responsibilities for data security, handling subject access requests, and breach notification
- state the duration of the sharing arrangement
- include a mandate for the secure archiving or disposal of the data once the purpose is fulfilled.

For internal and external data sharing and reporting arrangements, a written agreement and a commitment to ongoing review are essential to managing data lifecycle risks, preventing data drift (using data beyond the agreed purpose), and demonstrating continuous accountability.



Communication and understanding

Data sharing and reporting requirements must be agreed, communicated and accessible to staff and students - including those in partnership arrangements (as set out in [Principle 8 - Operating partnerships with other organisations, Key Practice c](#)). This ensures that all parties understand their roles and responsibilities with regard to sharing and use of data.

A key legal consideration for providers when sharing student data in an emergency is that data protection law does not prevent the sharing of personal information where it is necessary to protect life or prevent serious harm, under [UK GDPR](#) and the [Data Protection Act 2018](#).

The [Information Commissioner's Office \(ICO\)](#) has consistently emphasised that staff in universities and colleges should not be deterred from sharing information in urgent situations. Where there is a genuine risk to life or of serious harm, staff are expected to act in a necessary and proportionate way. The ICO recognises that decisions made in good faith during emergencies will not be penalised, provided they are reasonable and appropriately justified.

Proportionate and reliable reporting

Information and evidence used for reporting must be accurate, relevant and proportionate to its intended purpose. It should align with agreed reporting frameworks and be presented in a way that provides assurance and supports effective decision-making at the appropriate level within the institution. Proportionate and reliable reporting is fundamental to good governance, ensuring that decision-makers, such as a Board of Trustees or Governors, receive information that is both dependable and appropriately detailed.

All data, whether relating to student outcomes, research income, financial performance or estates utilisation, should be accurate, verifiable and consistent across institutional systems (for example, student records systems, HR platforms and financial ledgers). Reporting will be subject to the controls and validation processes set out in the provider's strategic approach to managing data to maintain data integrity.

The level of detail and frequency of reporting needs to be commensurate with the strategic significance, risk and potential impact of the subject matter. Higher-risk or strategically critical areas should be reported with greater frequency and depth, while lower-risk areas may be monitored through more proportionate, periodic reporting.

Providers are advised to consider the risks associated with withholding or restricting access to data where lawful, proportionate sharing would enhance academic provision, support quality assurance, or improve decision making. Reporting arrangements should ensure that programme teams, relevant professional services and governance bodies receive timely, accurate and appropriate information necessary to fulfil their responsibilities.

Periodic review and assurance

All data sharing agreements stipulate an agreed duration (for example, one to three years) and include a requirement for periodic review. It is important that agreements should not automatically renew to avoid 'compliance drift'. Scheduled reviews provide assurance that legal, security and operational requirements remain valid and are being met.

Reviews are also triggered by significant changes, including updates to legislation, technological developments, or internal policy revisions, ensuring continued compliance with legal requirements.

Partnerships and data sharing arrangements

For partnership arrangements, it is advised that the data sharing agreement and reporting schedule require the partner organisation to submit regular updates (for example, quarterly) to the intuition's data governance function.

These reports provide assurance on:

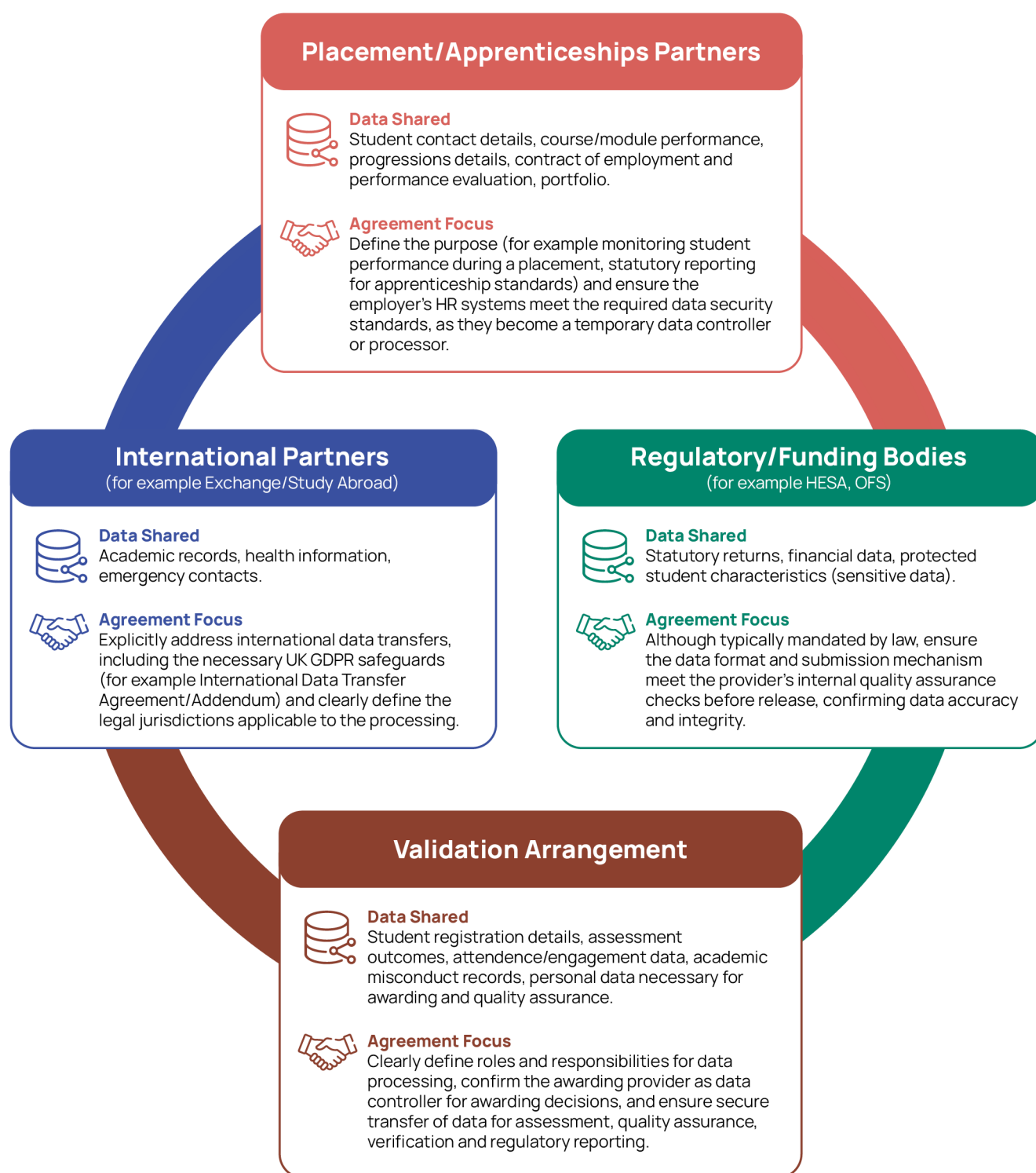
- continued use of the data in line with the agreed purpose
- any security incidents, breaches, or near misses
- data quality management, including assurance and improvement activities undertaken.

A comprehensive data governance framework should account for all types of data sharing arrangements. It is important to note that in all cases, the core principles of purpose limitation, data minimisation and mandatory reporting/review are consistently applied.

Prior to any initial data transfer, it must be confirmed that the partner's technical and organisational mechanisms for data management align with, and meet, the provider's minimum-security standards as stipulated in the data sharing agreement.



Figure 9: Examples of types of data sharing agreements and the focus for those different types of arrangements



Risk-based documentation

Providers are advised to invest resources in record keeping and agreement management commensurate with the potential impact and likelihood of data loss, breach or misuse. This avoids placing unnecessary administrative burden to a low-risk agreement as to a high-risk one. By adopting this risk-based approach, the provider ensures compliance resources are focused where the potential for harm to data subjects and to the provider's reputation is greatest, while maintaining basic accountability across all partnerships.

Table 6: Example of a risk-based approach to managing documentation

Risk factor	Illustrative example	Implications for record keeping
Data sensitivity	Sharing special category data (eg health or biometric data) compared with aggregated or anonymised data.	Special category data requires enhanced controls, including a mandatory Data Protection Impact Assessment, explicit lawful basis, and demonstrable security standards (eg ISO 27001).
Data volume	Sharing 10,000 student records compared with a small sample of 10 records.	Larger data sets increase the potential impact of a breach and therefore require more detailed records, including audit trails and incident response arrangements.
Partner type	Sharing data with a public authority versus a small or emerging EdTech provider.	Less established partners require more robust due diligence, clearer contractual assurances, and documented assurance of ongoing security controls.
Data flow (processing role)	Partner acting as a Data Processor versus a Joint Controller.	Joint Controller arrangements require detailed documentation setting out respective responsibilities, liabilities and arrangements for data subject rights.

Unconscious data sharing

Unconscious data sharing refers to the non-malicious disclosure or accessibility of personal data to other organisations without the data subject's conscious awareness or reasonable expectation. It fundamentally undermines the requirement that data sharing agreements must be clearly stated, understood and reviewed periodically.

Unconscious data sharing arises from various systemic failures, including:

- system configuration or defaults that facilitate excessive sharing beyond what is necessary
- the accumulation and retention of large volumes of data without clear purpose limitation
- inadequate transparency, where privacy information meets legal requirements but fails to communicate data use in a clear and accessible way
- unintended secondary use, where a partner uses data for purposes that were not originally specified or reasonably expected, potentially leading to adverse outcomes or stigmatisation.

Addressing these risks requires moving beyond baseline legal compliance towards meaningful transparency and active governance. Data sharing is limited to what is strictly necessary, in line with the principle of data minimisation ([UK GDPR](#)). Regular reviews and audits verify that partner organisations use data only for agreed purposes, safeguarding individuals' reasonable expectations of privacy and control.

Working with the student representative bodies

Providers maintain a data sharing agreement (DSA) with the student representative body, developed collaboratively to ensure both parties have access to the information required to meet institutional needs and external reporting obligations. For example, aligning data on student concerns, complaints and appeals enables a more comprehensive understanding of the student experience in this area and supports effective quality enhancement.

Their input into key DSA agreements across an institution, particularly those relating to purpose limitation and data minimisation, helps ensure that only the data necessary for defined quality enhancement activities is shared. As an established communication channel, representative bodies also support the dissemination of clear, accessible information about data sharing arrangements, promoting understanding and engagement across the student body.

More widely, the formal involvement of the student representative body in data governance demonstrates a commitment to transparency, fairness and partnership. Their engagement helps build trust among the student population by providing assurance that data is used responsibly. They also offer an independent perspective, helping to ensure that the purpose of data sharing aligns with student interests and is communicated clearly and accessibly.

Early engagement during the data protection impact assessment (DPIA) process is integral, particularly where higher-risk processing of student personal data is involved. Contributions from the student representative body might include assessing the proportionality of data sharing and identifying potential impacts on individuals' rights and freedoms, in line with [UK GDPR](#).

Reflective questions

1. Are our data sharing agreements and reporting requirements for internal and external partnerships clearly articulated and documented?
2. How do we ensure that all partners, including the student representative body, fully understand their responsibilities in relation to data sharing and reporting?
3. What mechanisms are in place to ensure data received from internal and external partners is accurate, consistent and reliable?
4. How is data from partnerships used to inform quality assurance and enhancement activities at the institutional level?
5. How do we monitor and evaluate compliance with data sharing agreements across our partnership portfolio?
6. Are we assured that we have a clear process for reviewing data sharing agreements and reporting requirements periodically, and what triggers this review?
7. How is the student voice incorporated into the review of partnership data and reporting?
8. How do we ensure our data collection and reporting meets legal data protection duties?
9. Do our governance structures enable the creation of action plans based on partnership data, and is there oversight of progress?
10. If an issue is identified through partnership reporting, what is the clear process for addressing it in a timely and effective way?
11. Beyond basic reporting, how can we use data from our partners to identify new opportunities for enhancement across our provision?
12. How do we pro actively share effective practices related to data use and reporting with internal and external partners?
13. How can we make our reporting from internal and external partnerships more current and useful for real-time decision-making?
14. How do we empower partners and student representatives to talk about areas that could be improved in our data sharing and reporting processes?
15. How do we ensure that our data collection and record management approaches are captured in procedural guidance to facilitate strong record keeping?

Scenarios

Scenario 1: Proactive data governance for student experience enhancement

Context

A provider is implementing a new strategic initiative to improve student progression and experience by leveraging internal and external data sources. A key component of this strategy involves a partnership with a specialist EdTech analytics company to process anonymised student engagement data alongside internal module performance records.

The goal is to identify early intervention opportunities for 'at-risk' students and assess the effectiveness of pedagogical changes. The institution's Data Governance Office (DGO) has established a strict framework to ensure all data sharing adheres to best practice, with formal agreements and robust quality assurance reporting being central tenets.

The partnership requires the transfer of high-volume, continuously updated student data (such as VLE login times, library usage, aggregated attendance) to the EdTech provider. Crucially, the provider processes this data solely as a data processor on behalf of the institution who insists on a formal, written Data Sharing Agreement (DSA) being in place before any data transfer commences.

This DSA is not a standard template but a bespoke document clearly specifying:

- the exact data fields to be shared (adhering to data minimisation)
- the defined purpose (identifying 'at-risk' students and informing curriculum enhancement)
- strict limitations on the EdTech provider's ability to process the data for any secondary use, including training their own general algorithms
- a mandated a biennial review cycle for the DSA to ensure its terms remain relevant against evolving technology and legislation (such as changes to internal IT infrastructure or new ICO guidance)
- quarterly reporting schedule linked to quality assurance (QA) metrics. This reporting is designed to verify the provider's data security compliance and to measure the project's success in meeting the defined enhancement objectives.

Considerations

- How can the provider effectively audit and confirm that the EdTech provider is strictly adhering to the specified data usage purpose and not using the shared data for any unauthorised secondary activities?
- What specific mechanisms must the institution put in place to ensure the mandatory biennial review of the DSA is completed rigorously, addressing both legal compliance and technical alignment updates?
- What specific content and format should the quarterly QA reporting schedule detail to effectively measure the project's success and provide evidence of data security and quality assurance back to the university's governing bodies?

Scenario 2: Enhancing research data collaboration and compliance

Context

A provider is embarking on an ambitious multi-institutional research project with an international pharmaceutical company and a national health service trust, focusing on the long-term efficacy of a new drug. The project involves sharing pseudonymised patient health data, anonymised genomic data, and aggregated clinical trial results between the three partners. They are leading the data management and analysis work package and are acutely aware of its responsibilities under UK GDPR, the Data Protection Act 2018, and relevant research ethics guidelines.

The collaborative research project, funded by a major grant, spans five years and aims to publish significant findings that could influence future public health policy. To facilitate this, a complex data sharing system needs to be established.

The provider, as primary data controller for the initial patient recruitment phase, is responsible for drafting a comprehensive Data Sharing Agreement (DSA) that will govern the transfer, processing, storage and eventual destruction of all shared data. This DSA must cover interactions with both the commercial entity (pharmaceutical company) and the public body (NHS trust), each with their own distinct legal and ethical frameworks.

Initial discussions have revealed the following challenges:

- the pharmaceutical company operates under different international data protection regulations and has a proprietary data platform, necessitating significant technical alignment
- the NHS trust, while accustomed to data sharing, requires specific assurances regarding anonymisation techniques and data governance oversight
- a preliminary risk assessment has highlighted potential discrepancies in data security standards and reporting protocols between the partners.

The institution's internal Data Governance Office is tasked with ensuring that all data sharing is lawful, secure and transparent, and that robust reporting mechanisms are in place to monitor compliance and demonstrate accountability to internal committees, funding bodies and regulatory authorities.

An internal audit conducted during the planning phase noted that while individual project teams generally adhere to data protection principles, there is a lack of standardised, centralised reporting on the number, nature and status of active DSAs across the institution. This makes it difficult for senior management to gain a holistic view of data sharing activities and associated risks.

Considerations

- How can the provider ensure the Data Sharing Agreement adequately addresses the varying data protection standards and legal obligations of all three international and national partners?
- What steps should the institution take to establish integration and secure system alignment for data transfer and processing between its own infrastructure, the pharmaceutical company's proprietary platform, and the NHS trust's systems?
- What comprehensive reporting framework should the institution implement to provide clear oversight of all active DSAs, monitor compliance by external partners, and inform senior leadership and regulatory bodies of its data sharing activities and any associated risks?



Key Practice f - Data that enables the provider to respond to the needs of the student population

Key Practice f

Data that enables the provider to respond to the needs of the student population

Data is collected and analysed in ways that enable providers to understand and respond to the needs of their student populations, promoting equality, diversity and inclusion, and environmental sustainability.

Providers are encouraged to take a purposeful approach to the collection and analysis of data. This enables data to be used as a powerful enhancement tool, aligned to the varied needs of different student populations and the institution's strategic approach to equality, diversity and inclusion, and environmental sustainability.

An evidence-based approach is fundamental to an effective quality framework. It ensures that the information underpinning continuous improvement is valid, objective and demonstrable. The data collected should be capable of being scrutinised and interrogated across different institutional levels and with the appropriate granularity.

It is recommended to communicate data-informed actions and decisions in a clear, transparent and effective way to students and other stakeholders. This fosters a culture of shared responsibility for continuous enhancement between the institution, its staff and its students.

Providers typically articulate their commitments to equality, diversity and inclusion, and environmental sustainability through institutional strategies, policies and frameworks, such as EDI strategies, sustainability strategies and related academic quality and enhancement processes. Data collection and analysis play a key role in enabling institutions to understand progress against these commitments, evaluate the impact of interventions, and inform continuous enhancement.

Providers are reminded to remain alert to the limitations of available datasets and the possibility that some student experiences or barriers may not be fully visible through quantitative data alone. Qualitative evidence, student voice and reflective evaluation can be used to supplement data analysis and to avoid over simplified or deficit-based interpretations of student outcomes.

Data that drives action rather than debate

Providers are often driven by regulatory requirements in terms of data reporting - if this is centred on outcomes data only, it may not (on its own) explain an area of underperformance. Providers are advised to consider taking a whole-provider or systemic view of their data.

This involves identifying:

- **Leading indicators** (for example, student engagement with digital platforms, early assessment performance, or participation in support services). Leading indicators can signal both operational issues that can be immediately addressed, or opportunities for improvement that might be implemented for the next cycle.
- **Lagging indicators** (such as progression, attainment or graduate outcomes). Lagging indicators enable evaluation of long-term trends and strategic impact. By combining both perspectives, providers can ensure that data analysis informs decisive action at the right level, helping staff and students focus on solutions and continuous improvement.

Where data analysis highlights structural or systemic inequities, persistent gaps or differential outcomes for specific student groups, providers should take timely, proportionate and evidence informed action to address these issues. Action should be directed at removing or mitigating institutional barriers.

Understanding the needs of different student populations

A core element of this practice is consistent and systematic use of disaggregated data (see terminology) to understand the outcomes for different student groups. Providers can analyse quantitative data by protected characteristics, such as gender or disability status, to identify any disparities, attainment gaps and emerging risks to inclusion across the student lifecycle. This supports a more anticipatory approach to inclusive practice, enabling providers to address potential barriers in learning design, assessment and support before this result in differential outcomes. Such analysis should be undertaken in line with institutional policies on ethical and inclusive data use, supported by staff guidance and proportionate safeguards, to avoid the identification of individual students (see [Key Practice c](#) and [d](#)).

This can be allied with qualitative evidence gathered from student voice activities, such as survey comments and focus groups, to develop a holistic picture of the student experience. This is one mechanism that enables providers to ensure that different student groups are not disadvantaged by their practices, institutional barriers are removed and each student is supported to realise their potential. (See [Principle 2 - Engaging students as partners](#), [Key Practice c](#) for more information relating to demonstrating effective engagement that reflects the diversity of the student population.)

Triangulation of qualitative and quantitative evidence enables providers to gain richer insight into the student experience of their diverse student body, identify root causes of challenges such as attainment gaps and partner with students to co-create effective and tangible solutions.

Using data to promote equality, diversity and inclusivity (EDI)

EDI can be advanced through the systematic collection and analysis of disaggregated data relating to different aspects of student identity, including protected characteristics.

Analysis of engagement and participation data can help identify where particular student groups are underrepresented in mechanisms such as student representation, surveys, co-creation activities or enhancement projects. Where disparities are identified, targeted and proportionate action may be taken at institutional, departmental or programme level to ensure student voice processes are genuinely inclusive and reflect the diversity of the student population.

Subject to appropriate ethical and legal safeguards, EDI data can be aggregated, disaggregated and shared across the different levels of an institution to support enhancement and accountability (see [Key Practice c](#)). For example, data on continuation, attainment, progression and assessment outcomes, disaggregated by protected characteristics can be made available at institutional, departmental, programme and module level (see table 7 on page 81). This enables programme teams and teaching staff to understand the composition and outcomes of their cohorts and to take data-informed action to remove potential barriers within curriculum design, course content, learning and teaching, and assessment and feedback practices.

In applying disaggregated analysis, providers may consider the intersection of multiple personal and protected characteristics to understand how they combine to shape students' experiences, perceptions and outcomes. Used proportionately and in line with ethical and legal safeguards, an intersectional analysis can support more inclusive curriculum design and learning practices by highlighting where teaching approaches, assessment formats or learning environments may inadvertently disadvantage particular student groups.

Providers are reminded to be extra vigilant when it comes to working with data that may result in very small numbers which can result in subjects being identifiable in reporting.

Useful considerations in this instance could involve:

- the use of qualitative descriptions instead of numbers such as 'a few' or 'rare occurrence'
- the rounding of figures
- avoiding publishing totals and subtotals that allow back-calculation
- using aggregate categories where appropriate (noting that over-aggregation can hide meaningful disparities)
- replacing exact values with bands (for example, '< 5' or 'fewer than 10')
- conducting a disclosure risk assessment
- being transparent about the limitations of the data.

At a governance level, using EDI data as an explicit and routine part of institutional monitoring and assurance processes signals and aligns to an institutional commitment to EDI. In line with regulatory expectations, the systemic use of disaggregated EDI data enables the identification and monitoring of risks to equality of opportunity and inclusive learning for different groups and contexts across access, continuation, attainment and progression.

This approach supports the development, implementation and ongoing oversight of Access and Participation Plans, Outcome Agreements, Fee and Access Plans or Widening Access and Participation Plans (depending on UK nation) by providing an evidence base for identifying indicators of risk, setting measurable objectives and evaluating the effectiveness of interventions over time. When embedded within governance and reporting structures, EDI data enables governing bodies and senior leaders to scrutinise progress against agreed priorities and assess whether planned activity is having a positive impact. Such governance arrangements support accountability for compliance with approved plans and for the continuous improvement of equality of opportunity for all students.



Table 7: Examples of EDI-related data and how it can be used across different levels of a provider

Level	Key data types	How the data can be used
Institutional	Identify strategic risks to equality of opportunity and monitor institutional performance • Student lifecycle data (access, continuation, attainment, progression) by demographic group • Survey data (eg NSS) • APP targets and Equality of Opportunity Risk Register (EORR) indicators • Workforce EDI metrics (recruitment, progression, pay gaps)	• Set and evaluate APP priorities • Monitor regulatory compliance • Identify sector/institution-wide gaps • Inform institution-wide EDI strategy and action planning
Departmental	Identify patterns and structural inequalities within subject areas or departments • Programme-level student outcomes by demographic group • Engagement with learning, assessment and support • Intersectional data (where available) • Local workforce data (recruitment, workload, retention, surveys)	• Design targeted interventions aligned to APP priorities • Address subject-level attainment or engagement gaps • Inform local workforce planning and inclusive practices

Continued ...

Level	Key data types	How the data can be used
Programme	Identify programme-level barriers to equality of opportunity • Programme and module outcomes by demographic group • Continuation and completion trends • Assessment performance and study mode • Representation in student voice roles • Teaching team engagement with inclusive practice	• Review curriculum and assessment design • Implement targeted changes to address identified risks • Monitor inclusivity within teaching and support practices
Module	Identify specific learning and assessment-related inequalities • Assessment outcomes (where cohort size permits) • Engagement with learning activities • Use of reasonable adjustments / alternative assessments • Student feedback on inclusion	• Adapt learning design and assessment methods • Ensure inclusive delivery and accessibility • Address unintended disadvantage in specific modules

Note: The availability and use of disaggregated data should be proportionate to provider context and cohort size, aligned with institutional policies on ethical data management and used in accordance with appropriate staff training and guidance. Where appropriate and ethically permissible, analysis may consider the interaction of multiple characteristics to avoid over-simplified interpretations of student experience.

Using data to embed environmental sustainability

Environmental sustainability can be embedded in academic quality and governance processes by using qualitative and quantitative data, demonstrating its integration into institutional strategy, curriculum design, student engagement and staff practice. Effective use of this evidence helps integrate sustainability into academic quality processes, in line with the [QAA and AHE guidance on Education for Sustainable Development \(ESD\)](#).

Data relating to sustainability can be used to monitor progress against institutional sustainability commitments, such as sustainability strategies, and external frameworks, such as the [UNESCO Sustainable Development Goals](#). At programme level, this may include evidence of how sustainability and ESD are articulated within programme and module learning outcomes, how they are embedded within a learning and teaching strategy, and how they are experienced and understood by students.

Data can also support understanding of student and staff engagement in relation to sustainability. For example, participation in sustainability-related training, curriculum development initiatives, student partnership activity or wider learning activities can be monitored to provide insight into how sustainability is being embedded across the institution. Qualitative data drawn from student feedback, programme approval processes and enhancement activity can complement quantitative indicators by evidencing how sustainability is enacted in practice and how it contributes to students' learning and development.

The use of sustainability-related data as part of routine monitoring and assurance processes at a governance level signals alignment with an institutional commitment to environmental responsibility and sustainable development. It enables governing bodies and senior leaders to evaluate the extent to which sustainability is being meaningfully integrated into learning and teaching, to assess progress against strategic objectives and to identify where further ESD-focused activity may be appropriate.



Table 8: Examples of data related to sustainability and how that data can be used across different levels of a provider

Level	Key data types	How the data can be used
Institutional	Identify strategic risks and monitor institutional performance in delivering sustainability commitments • Sustainability strategy indicators • Climate action plan targets • Mapping of provision to the UNESCO Sustainable Development Goals (SDGs) • Institutional survey data on sustainability awareness and engagement	• Identify strategic priorities and risks • Monitor progress against institutional sustainability commitments • Support reporting and accountability • Inform institution-wide sustainability strategies and action plans
Departmental	Identify patterns and variation in sustainability/ESD practice across faculties, schools or departments • Evidence of education for sustainable development (ESD) across programme portfolios • Staff engagement with sustainability training • Curriculum review activity relating to sustainability or ESD	• Identify subject-level approaches to sustainability • Target local support and enhancement activity • Share effective practice across departments

Continued ...

Level	Key data types	How the data can be used
Programme	Identify programme-level opportunities to strengthen sustainability/ESD within learning, teaching, and assessment • Programme-level learning outcomes relating to sustainability or ESD • Student feedback on sustainability content • Involvement in sustainability-related projects or activities	• Review curriculum alignment with sustainability objectives • Strengthen learning design and assessment • Improve student understanding of sustainability within the subject area
Module	Identify specific learning, teaching and assessment practices that develop sustainability knowledge and skills • Module learning outcomes and assessments linked to sustainability themes • Student engagement with sustainability-focused activities • Student feedback on sustainability content	• Review teaching, learning and assessment approaches • Strengthen sustainability content within modules • Identify opportunities to improve accessibility and engagement

Alignment with student values

Using a data-informed approach to understanding the student experience enables providers to develop a comprehensive picture of who their students are, what they value and how they experience belonging within the institution.

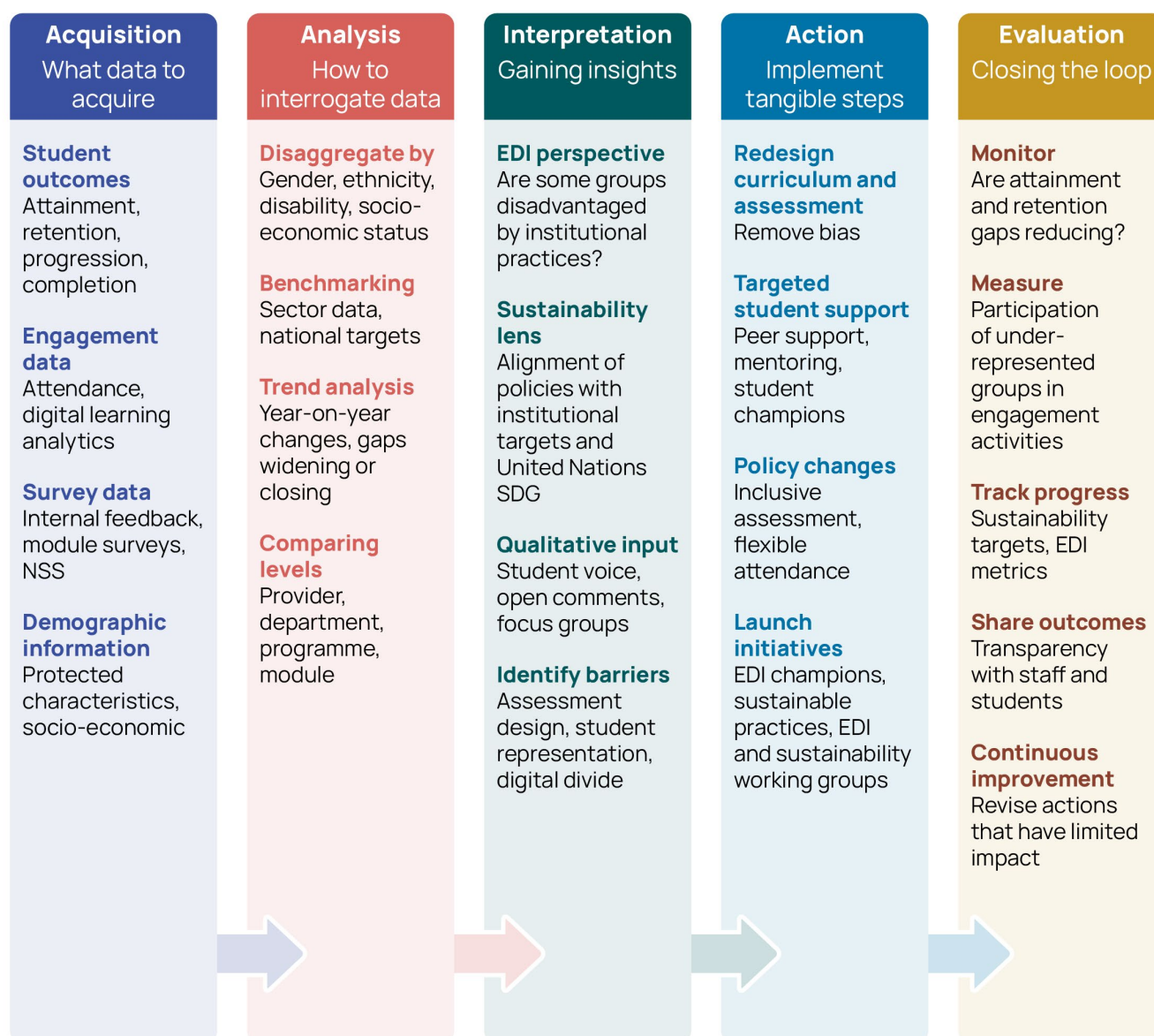
Alongside data relating to equality, diversity, inclusion and environmental sustainability, providers can draw on qualitative and quantitative evidence from student engagement, participation and feedback. This includes data that captures students' sense of belonging, representation and inclusion within academic and institutional communities. Together, this evidence can illuminate what motivates students, how their values develop over time and the ways in which they feel connected to their institution.

Understanding student values through data enables providers to create learning environments, design curricula and foster institutional cultures that align with students' academic identities and future aspirations, while supporting students to form and express their own values with confidence.

The use of data to inform approaches to EDI and environmental sustainability therefore forms part of a broader institutional commitment to enhancing the student experience. It enables providers to demonstrate responsiveness to what matters to their diverse student population, while supporting students to develop confidence, ethical awareness and an understanding of their wider social and environmental responsibilities within inclusive learning communities.



Figure 10: Top level outline of how different data might be used to inform meaningful change in equality, diversity and inclusion and environmental sustainability



Examples are for illustrative purposes only. This is not a definitive or comprehensive list.

Reflective questions

1. What mechanisms do we have in place to ensure our data collection and analysis strategies are aligned with our institutional commitment to EDI and environmental sustainability?
2. How do we systematically analyse student data (including outcomes, attainment and retention) by protected characteristics to identify and address structural barriers, inclusive design issues or attainment gaps?
3. In what ways do we triangulate quantitative data with qualitative feedback from diverse student groups to understand their student experience, in the co-creation of solutions and in shaping inclusive enhancement activity?
4. How are students, particularly those from underrepresented groups, engaged as partners in the interpretation of findings relating to their experience and in the co-creation of solutions?
5. What metrics do we use to monitor our progress against environmental sustainability targets, such as the UNESCO Sustainable Development Goals, and how does this data inform both our curriculum design and the management of our physical and digital learning environments?
6. In accordance with appropriate safeguards and staff training, to what extent are data sets and insights from data analysis made accessible to staff at all levels to inform decision making?
7. How do our governance structures ensure that analysis leads to timely action plans with measurable impact?
8. How do we close the feedback loop by communicating to students and staff how data has been used to implement changes that embed EDI and promote a more sustainable learning environment?
9. How do we ensure that our analysis goes beyond identifying gaps in outcomes to diagnosing the root causes of issues, or directing specific actions to improve?
10. In what ways can we partner with students to interpret and co-design improvement interventions that have been informed by the data?
11. How can we use sustainability data, both in terms of the practice of teaching and the discipline being taught to co-design the curriculum and delivery model?
12. How do we drive enhancement rather than comparison against normalised practice?

Scenarios

Scenario 1: Attainment gaps

Context

Data analysts within a provider identify that there has been a persistent gap in outcomes between an historically marginalised group of students and the remaining student body in a particular programme. This gap was also larger than for similar students on other programmes in the same faculty.

Considerations

- What additional qualitative or contextual evidence is available to corroborate or challenge this quantitative finding (for example, student focus groups, module evaluation survey, assessment feedback)?
- What evidence do you have that the programme is achieving the academic standards and learning outcomes for academic provision that you have specified?
- How have programme teams been supported to reflect on the data, explain potential contributory factors and evidence action taken to address identified shortfalls?
- To what extent does the data suggest a programme-specific issue or indicate a wider, systemic pattern that is only surfacing most noticeably within this programme?
- What safeguards are in place to ensure that this data analysis does not identify individual students or small cohorts?

Scenario 2: Academic module improvement

Context

At the end of a core module, the module team held a structured review with students as part of its annual enhancement process. This included an open discussion focused on how the teaching, learning and assessment design had supported students' learning across the module.

Qualitative feedback from this session indicated that some students who identify as neurodivergent felt that the time-limited written examination put them at a disadvantage. Students described the assessment as capturing performance on a single day rather than reflecting their typical learning, understanding or ability across the whole module. More broadly, some students questioned whether the examination reflected the types of tasks, problem-solving or communication that would be expected in a future employment situation.

This feedback was considered alongside module evaluation survey data and assessment outcomes, prompting the module team to reflect on the inclusivity, authenticity and effectiveness of the current assessment approach.

Considerations

- What additional quantitative or qualitative evidence is available to understand whether specific groups of students are being disadvantaged? For example, patterns in assessment outcomes, use of reasonable adjustments or feedback on assessment clarity.
- How does the assessment align with the intended learning outcomes for the module and what evidence demonstrates that it provides a valid and reliable measure of student achievement?
- What evidence or explanation can be shared with students to clarify the rationale of the assessment design and how it supports the authenticity of the assessment for learning and employability?
- Based on the data analysis, what alternative assessment approaches could be explored to enhance inclusivity and authenticity while maintaining academic standards?
- How might insights from this module inform curriculum and assessment review at programme level and wider discussions about inclusive assessment practice?

Terminology

Terms used regarding the legal and ethical use of data

Term	Definition
Anonymisation	Data that does not contain personal details which could identify individuals, either directly or indirectly.
Data protection impact assessment (DPIA)	A formal process used to identify and reduce risks when data use could significantly affect people's rights or privacy, especially where data is sensitive, large scale, or technology driven.
Equality of opportunity	Ensuring that students have fair access to learning, support and outcomes, without disadvantage arising from their background or personal characteristics.
Inclusive data practices	Ways of collecting, analysing and using data that actively avoid harm, respect privacy and support fairness, inclusion and transparency.
Intersectionality / intersectional analysis	An approach that recognises people may experience overlapping forms of advantage or disadvantage (for example, disability and ethnicity), which together shape their experiences and outcomes.
Personal data	Any information that can identify a person, either directly (such as a name or student number) or indirectly (such as a combination of course, age and circumstances).
Protected characteristics	Personal characteristics protected by law, such as age, disability, sex, race or ethnicity, religion or belief, and sexual orientation.
Pseudonymisation	Data that contains personal details that have been replaced or scrambled so that individuals cannot be identified without further information, for example a lookup table that matches student IDs with their names.
Unconscious data sharing	The non-malicious disclosure or accessibility of personal data to partner organisations without the data subject's conscious awareness or reasonable expectation.

Data management and use

Term	Definition
Data acquisition	The process of obtaining, collecting or receiving data from internal or external sources for a defined purpose. In tertiary education, the term is often broader than 'data collection', because it covers data received from third parties (for example, partner institutions, UCAS, HESA, employers) as well as data collected directly from students and staff.
Data assets	Data that is collected, stored and managed by a provider, which holds value for decision making, operations or strategic planning.
Data credibility	An aspect of data quality that determines the extent to which data can be regarded as accurate, reliable, relevant and trustworthy.
Data flow	The movement of data through systems, applications and processes - it provides detail as to how the data originates, is transformed and is ultimately delivered.
Data literacy	The ability to understand, interpret and use data effectively to inform decisions and actions.
Data maturity	An organisation's ability to manage, analyse and use its data to make informed decisions.
Data sharing agreement (DSA)	A written agreement that clearly sets out what data is shared, why it is shared, who is responsible for it and how it is protected.
Data warehouse	A centralised digital storage system designed to house and aggregate important data to enable efficient, effective and consistent analysis and reporting.

Terms used as part of collection, analysis or drawing conclusions from data

Term	Definition
Aggregated data	Individual data sets that are combined or summarised from individual records to provide an overview at a higher level, for example, to view progression, continuation or attainment data at a programme, faculty or institutional level.
AI assisted data analysis	The use of AI tools to support analysis of data, for example by identifying themes in written feedback. Human judgement and oversight remain essential.
Disaggregated data	Combined or summarised data sets that are broken down to show outcomes for specific groups, characteristics or components, for example, disaggregating programme pass rates to show individual student pass rates by protected characteristics such as gender, disability status or ethnicity.
Evaluation of impact	Reviewing what difference an action or change has made, rather than simply whether data was collected or targets were met.
Data informed decision making	Using data alongside professional judgement, lived experience and student voice to inform decisions, rather than relying on data alone.
Data subject	The individual the data is about, for example, a student or member of staff whose personal data is being collected or used.
Generative artificial intelligence (Generative AI/ GenAI)	AI technologies that can generate text, images, summaries or analyses based on large datasets, rather than simply retrieving existing information.
Learning analytics	The use of data about learning activities (such as engagement with online materials) to understand and support student learning and success.
Over claiming	Drawing conclusions that go beyond what the data can reasonably support, for example assuming cause when only correlation is shown.
Predictive analytics	The use of historical and current data to identify patterns or trends that may indicate future outcomes, such as potential risks to progression.

Term	Definition
Progression data	Relates to the successful (or not) progression of a student - this can be a student progressing from year to year or level to level. The term is sometimes used in regard to data relating to the completion of an award (in this guidance referred to as 'completion').
Qualitative data	Information that describes qualities, characteristics or attributes rather than numerical measurements. It captures the nature of something, such as how people think, feel or experience a situation, mostly using words instead of numbers.
Quantitative data	Information which can be expressed numerically, using a scale or using categories, for example Home or Overseas, class of degree.

Roles and responsibilities around the use of data

Term	Definition
Data controller	The organisation that decides why and how personal data is used. In most cases, this is the university or provider.
Data processor	An organisation or service that processes data on behalf of the data controller, following their instructions, for example, a survey platform or analytics provider.
Joint controller	Two or more organisations jointly decide how and why personal data is used and therefore share responsibility for it.

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Continue exploring the Advice and Guidance

This publication is part of a suite of Advice and Guidance that accompanies the [UK Quality Code for Higher Education 2024](#).

Select the Principles below to access additional guidance, practical considerations and resources that support the enhancement of quality and the maintenance of academic standards.

Principle 1

Taking a strategic approach to managing quality and standards



Principle 2

Engaging students as partners



Principle 3

Resourcing delivery of a high-quality learning experience



Principle 4

Using data to inform and evaluate quality



Principle 5

Monitoring, evaluating, and enhancing provision



Principle 6

Engaging in external quality review and accreditation



Principle 7

Designing, developing, approving, and modifying programmes



Principle 8

Operating partnerships with other organisations



Principle 9

Recruiting, selecting and admitting students



Principle 10

Supporting students to achieve their potential



Principle 11

Teaching, learning and assessment



Principle 12

Operating concerns, complaints and appeals processes





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