

The Data Controller of the information being collected is: UHI North, West and Hebrides (NWH), Ormlie Road, Thurso, Caithness, KW14 7EE.

For any queries or concerns about how your personal data is being processed our Data Protection Officer at [dpo.nwh@uhi.ac.uk](mailto:dpo.nwh@uhi.ac.uk)

**This privacy statement relates to the following processing:**

Further Education – enrolment

This process confirms your enrolment on your course. This process involves students confirming or editing data collected at application or previous enrolments and agreeing to the terms and conditions of enrolment at UHI North, West and Hebrides. The enrolment process must be completed annually, before or at the start of each academic year of study throughout the duration of study with the university.

**Other relevant information and privacy notices:** Please read the course handbook for your course to understand exactly what your course involves. If you have any questions please contact the course leader.

**Your information will be used for the following purposes:**

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| <b>Purpose 1:<br/>Academic matters</b> | Academic matters, including: <ul style="list-style-type: none"> <li>• the provision of our core teaching, learning services (e.g. registration, assessment, attendance, managing progression, academic misconduct investigations, certification, prizegiving);</li> <li>• maintaining student records (to ensure we have the correct data for students);</li> <li>• the production of student ID cards (where applicable)</li> <li>• assessing your eligibility for bursaries and other grants (confirming mode of attendance, start date, personal details);</li> <li>• Administering any placements as part of your course</li> <li>• Providing you with certificates</li> <li>• Monitoring and enhancing the student experience (through student feedback, eg complaints, surveys, Redbutton etc.)</li> </ul> |
| <b>Purpose 2:<br/>Student support</b>  | UHI NWH provides a range of student support services and needs to process your data to make these services available to you and to administer and deliver the services, including additional services you may require. UHI NWH will process your personal data for the purpose of student support including, but not limited to, the purposes set out below (Purposes 2A-2I)   |
| <b>Purpose 2A: student support</b>     | Providing student support services, including: <ul style="list-style-type: none"> <li>• Personal academic support (Personal Academic Tutors (PATS and equivalent staff eg LDWs and PDAs).</li> <li>• Providing pastoral care to students</li> <li>• Providing general student support services</li> </ul>  |

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| Purpose 2B: Learning support                            | Supporting students who may require a Personal Learning Support Plan (PLSP) – <a href="#">More information and privacy notice</a>  |
| Purpose 2C: Support for vulnerable and priority groups  | UHI NWH is required to provide certain priority groups of students with proactive assistance.<br>1) Proactive contact and support for care experienced students – <a href="#">More information and privacy notice</a><br>2) Proactive contact and support for estranged students – <a href="#">More information and privacy notice</a><br>3) Proactive contact and support for student carers – <a href="#">More information and privacy notice</a>  |
| Purpose 2D: Student funding, scholarships and bursaries | Assisting you with, and contacting you about, your student finance arrangements and any funding to which you may be entitled. This may include contacting you about, or assisting you with, matters that may affect your entitlement for funding (Such as attendance). (also see purpose 4)  |
| Purpose 2E: Counselling                                 | UHI NWH offers Counselling services to students. Please contact your student support team for more information<br><a href="mailto:counselling.nwh@uhi.ac.uk">counselling.nwh@uhi.ac.uk</a> .   |
| Purpose 2F: Mental Health and Wellbeing support         | Providing specific student support services such as mental health and wellbeing support. UHI delivers some of these services directly and sometimes by arrangement with external providers such as: <ul style="list-style-type: none"> <li>• <a href="#">SpectrumLife Student assistance</a></li> </ul>  |
| Purpose 2G: Occupational Health services                | Some courses require that you undertake an occupational health assessment to make sure you can safely take part in the course activities (or alternative or adjusted activities based on your assessment). Outcomes from your assessment may be shared with UHI NWH and used to consider whether you can take part in the courses, and what adjustments can be made to help you take part. UHI NWH may deliver this service through an external organisation.  |
| Purpose 2H: Gender Based Violence (GBV) support         | UHI NWH seeks to reduce GBV in our campuses, protect our students, and provide support to victims of GBV. UHI NWH student support services offers <a href="#">GBV support</a> .  |
| Purpose 2I: Careers and Employability support           | UHI provides a Careers and Employability support service available to all UHI students. We process some of your data to administer the function and deliver the service to you. You can access the Careers service <a href="#">here</a> .  |
| <b>Purpose 3:<br/>Library and ICT</b>                   | <p>Providing library, IT and information services (for example, access to email, virtual learning environment (VLE) and library services). As part of this your name, student number, and university email address will be included on UHI’s email address list which is available to all UHI partnership staff and students and HISA staff. This allows staff and peers to email you and allows you to contact peers and staff. More detail on data processing in the UHI VLE Brightspace is available <a href="#">here</a>.</p> <p>Please be aware that the organisation reserves the right to access files and communications created in UHI systems (including systems provided for UHI work) as set out in <a href="#">UHI’s ICT Acceptable Use Policy</a>. <a href="#">UAP summary here</a>.</p> |

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|  | <p>UHI records some of its taught sessions (eg lectures). Taught sessions may also be recorded by students with a PLSP requiring recording of sessions. You can read more about taught session recording and learn how to object in the <a href="#">Privacy Notice - recording of taught sessions</a></p>  |
| <p><b>Purpose 4: Appropriate funding and fee collection</b></p>  | <p>Administer your funding and fees payments, including fees for study or any other fees. This includes working to ensure appropriate student funding (for example bursaries and travel) can be administered. To facilitate the administration and collection of students fees, including contacting you, or the person paying your fees, regarding fee payments.</p> <p>UHI NWH may pass your personal data, including details about payments or monies owing to debt collection agencies in certain circumstances.</p> <p>In some cases we may need to share personal data about you with other bodies as a condition of your funding (for fees or other costs). You should be informed of this by your funding provider when applying for funding.</p> <p>Assisting you with, and contacting you about, your student finance arrangements and any funding to which you may be entitled. This may include contacting you about, or assisting you with, matters that may affect your entitlement for funding.</p> |
| <p><b>Purpose 5: Returns and statistics</b></p>                  | <p>Other administrative purposes, including carrying out statistical analysis; statutory returns to SDS, SFC and other bodies.</p>   |
| <p><b>Purpose 6: Academic standards</b></p>                      | <p>Ensuring rigorous academic standards (for example checking work for originality and ensuring the correct information is present for examination boards).</p>  |
| <p><b>Purpose 7: Protecting vulnerable groups and others</b></p> | <p>Disclosure Scotland’s Protection of Vulnerable Groups (PVG) or Enhanced Disclosure Scheme Membership, which is a requirement for some courses. This will be clearly advertised on the college website.</p>  |
| <p><b>Purpose 8: Identity verification</b></p>                   | <p>Students may be required to verify their identity by showing photographic identity that may be matched with the photograph held on the student’s record. UHI NWH may provide you with college ID cards for this purpose. This is to ensure that only individuals with a legitimate reason are on campus or participating in activities and to detect and prevent disciplinary or academic misconduct.</p>   |
| <p><b>Purpose 9: Alumni Association and Alumni relations</b></p> | <p><b>Applicable to HE Students Only</b></p> <p>To maintain a mutually beneficial relationship with our alumni community for life. To keep in contact through newsletters, provide benefits and services and seek alumni support. Graduates of HE courses are automatically enrolled in UHI Alumni Association. <a href="#">Privacy notice here</a> – you can opt out by emailing <a href="mailto:alumni@uhi.ac.uk">alumni@uhi.ac.uk</a></p>   |

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| <p><b>Purpose 10: Emergency communications</b></p>                             | <p>We may need to contact you, this may be by text message and/or email, urgently with important information or guidance. For example, to inform you that a building is closed or to tell you about public health measures.</p> <p>Text message communications, if used, will be sent to the mobile phone number you provide to us (If you have provided one at enrolment or added one to your student record since).</p> <p>The full privacy notice on texting students can be accessed <a href="#">here</a>.</p>  |
| <p><b>Purpose 11: Contacting you</b></p>                                       | <p>UHI NWH may contact you by email regarding any of the other purposes in this privacy notice, any other matter associated with your studies at UHI NWH, or for any emergency purpose. In addition to emails, UHI NWH may contact you by text message for some reasons. More information about text messaging is included in <a href="#">UHI's Text messaging privacy notice</a>.</p>  |
| <p><b>Purpose 12: Equalities Monitoring and Reporting</b></p>                  | <p>To encourage, enhance and monitor equality of opportunity and treatment. To take steps to encourage and monitor equality as set out in the Equality Act 2010. And to create and assess such reports as are required for that function. This involves processing any equalities monitoring information you provide to UHI NWH when you apply/enrol.</p>   |
| <p><b>Purpose 13: Academic and conduct Investigations</b></p>                  | <p>UHI NWH sets standards and rules concerning the conduct of staff and students. These include all college policies, procedures, guidance. The college may need to process personal data of students to investigate potential breaches of its standards or rules. Depending on your course you may be subject to additional conduct requirements (eg medical or financial courses subject to the rules of relevant professional bodies – you can see more about relevant regulatory bodies in the 'Your data will, or may, be shared with the following recipients or categories of recipient' section of this notice). You may also be subject to additional rules if you live in university residential accommodation. The college may investigate where it has reason to suspect rules may have been broken or where it receives a complaint. Where UHI NWH has reason to think you may have acted in a fashion not in keeping with its rules, regulations, or policies it may investigate under its conduct policy or academic regulations. UHI NWH may investigate under different rules, regulations, and policies as required in the circumstances.</p> |
| <p><b>Purpose 14: References and qualification/academic history checks</b></p> | <p>If you apply to volunteer/work for, study at, or engage with organisations then they may ask UHI NWH to verify your qualifications, academic history or may ask UHI NWH for a reference. UHI NWH may also procure such references from other organisations where relevant to your applications or other matters. UHI NWH provides references in confidence to those who seek them.</p>   |

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| <b>Purpose 15: Quality assurance and improvement</b> | UHI NWH is required to maintain high standards of education and student service, and always seeks to improve its services. To do this UHI NWH may use personal data or send surveys to gauge its quality standards and gather opinions or information that can help it improve its services.  |
| <b>Purpose 16: Research and development</b>          | <p>The UHI Partnership, as a partnership of HE and FE organisations, has a public task to conduct research. Such research may be to investigate matters with a view to publishing results that contribute to fields of study and society in general or to contribute to the quality assurance and enhancement of UHI's own services (or both). Such research may be undertaken by, or with, UHI or any of its academic partners. UHI may also conduct research with other bodies. UHI may provide research data (that may include personal data) to selected other trusted, organisations for the purpose of research quality assurance or further research.</p> <p>UHI will also conduct research about its own services and functions to help understand and improve its services.</p> <p>This purpose includes anonymising data to create an anonymous data set for use in research.</p> |
| <b>Purpose 17: Archiving</b>                         | UHI NWH may archive material that is of cultural, scientific or statistical significance or which constitutes a part of the college's record of its business.   |

**Our legal reason for using the data is/are:**

**To achieve the following purposes:** Purpose 1: Academic matters, Purpose 2: Student support, Purpose 3: Library and ICT, Purpose 4: Appropriate funding and fee collection, Purpose 7: Protecting vulnerable groups and others, Purpose 5: returns and statistics, Purpose 13: Academic and conduct investigations Purpose 15: Quality assurance and improvement

**Our legal reason to use the data is:** Use is necessary for the performance of a contract with you or to take steps, at your request, before entering into such a contract. That contract being between the college and its students, and other parties to provide educational and other products and/or services and ensuring you can take part in key aspects of your course.

**To achieve the following purposes:** Purpose 2: Student support, Purpose 4: Appropriate funding and fee collection, Purpose 6: Academic standards Purpose 7: Protecting vulnerable groups and others, Purpose 8: Identity verification, Purpose 10: Emergency communications, Purpose 12: Equalities Monitoring and Reporting, Purpose 13: Academic and conduct investigations Purpose 15: Quality assurance and improvement

**Our legal reason to use the data is:** Use is necessary for us to comply with a legal obligation. Those legal obligations being the return of statistical data and reports to satisfy various agencies academic standards and funding arrangements and are sufficient and our obligations are being met. Our obligation to protect individuals under the Protection of Vulnerable Groups (Scotland) Act 2007. Photographs will be stored and identity may be checked against that record in order to meet the college's statutory requirement to fulfil its duties under the Protection of Children (Scotland) Act 2003, the Adult Support and Protection (Scotland) Act 2007, the Counter-Terrorism and Security Act 2015, the Children and Young People (Scotland) Act 2014, Health and Safety at Work Act 1974. Data will be processed for the purposes of enhancing and monitoring equality of access and opportunity, including reporting for that function, as required by the Equality Act 2010. UHI NWH may send your surveys or use data for quality assurance and improvement purposes based on its legal obligations to maintain and improve standards of its work and services to students and the community.

**To achieve the following purposes:**

Purpose 1: Academic matters, Purpose 5: returns and statistics, Purpose 2: Student support, Purpose 3: Library and ICT, Purpose 7: Protecting vulnerable groups and others, Purpose 8: Identity verification, Purpose 13: Academic and conduct investigations Purpose 15: Quality assurance and improvement Purpose 14: References and qualification/ academic history checks, Purpose 16: Research and development Purpose 17: Archiving

**Our legal reason to use the data is:** Use is necessary for the performing a task in the public interest or under official authority vested in us. That being the university's public task as an educational establishment. This may include contacting you to provide advice and guidance based on the information you have provided to us, and to assess your eligibility for financial assistance you may be eligible for, ensuring you can take part in key aspects of your course and that the institution fulfils its safeguarding and duty of care requirements to vulnerable groups. Photographs will be stored and identity may be checked against that record in order to detect and prevent disciplinary misconduct (example: in the form of fraud) or academic misconduct (example: cheating, impersonation). UHI NWH may send your surveys or use data for quality assurance and improvement purposes based on its public task to maintain and improve standards of its work and services to students and the community.

**To achieve the following purposes:**

Purpose 11: Contacting you Purpose 15: Quality assurance and improvement Purpose 14: References and qualification/ academic history checks

**Our legal reason to use the data is:** UHI NWH will contact you for a number of different reasons, the lawful basis will be associated with the purpose for which UHI NWH is contacting you. Contacting for any reason in this notice will be under the same lawful basis as that purpose. In addition, UHI NWH may contact you by text message – more information about contacting you by text message, including the lawful bases, is included in the [UHI text messaging privacy notice](#). UHI NWH may send your surveys or use data for quality assurance and improvement purposes based on its legitimate interests to maintain and improve standards of its work and services to students and the community. UHI NWH will also process your data for the purpose of providing references to other organisations regarding your academic or qualification history and interactions with UHI

NWH. The basis for this will depend on the nature of the request and UHI NWH’s reasons for responding.

**The data being used includes special category (sensitive) data, you are not obliged to provide this information. Our legal reasons for using this sensitive data, where provided, are:**

**Purpose 12: Equalities Monitoring and Reporting**

Use is necessary for UHI NWH to comply with a legal obligation and undertake processing required by law (Equality Act 2010) which is in the public interest. That processing may include using the data to offer and provide support and assistance as appropriate in line with the Equality Act.

Use of the data is also necessary for a matter of substantial public interest, that being; identifying and keeping under review the existence or absence of equality of opportunity or treatment.

**Purpose 2: Student support**

As part of your enrolment or student support journey, you may disclose sensitive personal data. This data will be used for the purposes of supporting and protecting as necessary. Such actions being required under enactment in the public interest under the Post-16 Education Act, Equality Act, Children and Young peoples’ Act, General duty of care, Mental Health (Scotland), and employment law.. The processing may also be required for the purposes of employment law or assessing the working capacity of individuals (including working on placement or in practical elements of study).

As also set out more specifically in these privacy notices:

Proactive contact and support for: [care experienced students](#), [estranged students](#), and Proactive contact and support for [student carers](#)

**Purpose 13: Academic and conduct investigations & Purpose 6: Academic standards**

To ensure investigations are fair, UHI NWH needs to consider all relevant evidence. Sometimes it may be the case that the evidence may include, or be indicative, special category data. In such cases, the college will consider the lawfulness of processing this information based on the specific circumstances of the case.

**Purpose 7: Protecting vulnerable groups and others,**

UHI NWH is required to conduct PVG and other safeguarding checks for some of its courses to protect the public. Processing of special category and/or criminal convictions and associated data is required by UHI NWH as a matter of substantial public interest, that being statutory purposes as UHI NWH is required, by law, to undertake such checks and protect the public.

UHI NWH may be provided with, or discover, data that indicates a risk factor to others. Such data may include special category or and/or criminal convictions and associated data. UHI NWH will use this data to protect vulnerable groups and all others. The exact legal condition will depend on the nature of the protective function but may include (not limited to): Protecting the Vital interests of individuals, statutory purposes: General Duty of Care, preventing or detecting unlawful acts, Regulatory requirements relating to unlawful acts and dishonesty etc, preventing fraud, safeguarding of children and of individuals at risk, or safeguarding economic well-being of certain individuals.

The course information will clearly state if you need to be a PVG member to study, if you are not sure or would like more information please contact Student Services. More information about the PVG can be found at <https://www.mygov.scot/pvg-scheme/>.

Our lawful basis for processing any criminal convictions data disclosed by Disclosure Scotland as part of the PVG scheme is:

Processing is necessary for reasons of substantial public interest those being;

- Meeting the college's statutory requirement to fulfil its duties under the Protection of Vulnerable Groups (Scotland) Act 2007.

Meeting the college's requirement to ensure that students meet the regulatory standards for professional study and practice, as set by the relevant professional body.

#### Purpose 5: Returns and statistics

UHI NWH processes special category data by providing it to the Scottish Funding Council as required. The sharing happens on the basis that it is necessary for reasons of substantial public interest, on the basis of law under:

Further and Higher Education (Scotland) Act 1992.

Further and Higher Education (Scotland) Act 2005.

EU legislation for the provision of the European Social Fund.

#### Purpose 16: Research and development

UHI may need to process special category data for its research purposes in the public interest. UHI will limit personal data to what is necessary for its research purposes and will use anonymised or pseudonymised data wherever possible.

**If you were to withhold the personal information we require for this process, the consequences would be that we would be unable to process your enrolment on your course.** This would mean the college would be unable to deliver teaching or provide student services; your college account would be cancelled and any funding or bursary applications you may have made will be delayed or cancelled.

**With regard to courses that require PVG Scheme Membership**, the college has specific duties under the Protection of Vulnerable Groups (Scotland) Act 2007. Should you be excluded from engaging with vulnerable groups you may be unable to participate in key aspects of your course. This may cause you complications if you have arranged funding for your course of study.

If you have concerns with regard to PVG Scheme Membership, you should discuss the matter as soon as possible with the college. We do not require you to disclose criminal convictions to us directly as part of the application process, but we may be informed of any criminal convictions by Disclosure Scotland as part of the PVG Scheme Membership process.

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

- **The University of the Highlands and Islands partnership colleges and learning centres**
- **Highlands and Islands Students' Association (HISA)** Information about HISA's data protection, including their privacy notices relevant to the purposes for which the data is shared with HISA, is available [here](#).
- **Scottish Funding Council (SFC)** Information about SFC's data protection, including their privacy notices relevant to the purposes for which the data is shared with SFC, is available [here](#).
- **Other bodies providing funding for your fees or other expenses** You may have entered into an agreement with another body who provide you with funding for your course, either directly to the college or indirectly through another party (that may be you). If you have entered into an agreement that requires UHI NWH to share your data with that funding body (or another party they nominate) then UHI NWH may share your data with that body.
- **Scottish Qualifications Authority (SQA)** Information about SQA's data protection, including their privacy notices relevant to the purposes for which the data is shared with SQA, is available [here](#).
- **Skills Development Scotland (SDS)** Information about SDS's data protection, including their privacy notices relevant to the purposes for which the data is shared with SQA, is available [here](#).
- **Scottish Social Services Council (SSSC):** For students on courses requiring. Or leading to, SSSC registration or practice regulated by the SSSC. The SSSC's privacy notice is available [here](#). Relevant courses include; Early Learning and Childcare, Childhood Practice. All SVQs where staff are employed in Social Service.
- **Any other relevant awarding body** Some UHI NWH courses are validated or awarded by external awarding bodies. If your course is validated or awarded by such an external body then your data will, or may, be shared with these bodies for the purpose of the awarding/validation relationship. This may include awarding, quality assurance invigilation, moderation or other purposes.
- **Local Authorities eg Comhairle Nan Eilean Siar; Highland Council**
- **Employers, Academic Institutions, or other organisations with which you have a relationship or to which you apply.** If you apply to volunteer/work for, study at, or engage with organisations then they may ask UHI NWH to verify your qualifications, academic history or may ask UHI NWH for a reference.
- **Postal services:** UHI NWH may need to send you letters or documents by post. UHI NWH may need to supply details to these providers to post items to you.
- **Scottish Government**
- **College Scotland**
- **Colleges Development Network**
- **Education Scotland**
- **Community Planning Partners for ESOL Provision**
- **Where we are obliged to do so by law including court orders and other regulatory bodies (for example Managing Authorities for European Social Funded (ESF) courses**
- **Employers and Managing Authorities/Agents who are supporting or funding your studies**

Limited personal data will, or may, be shared with contracted third parties to enable provision of services for the purposes of teaching, learning and administrative support and IT provisioning. This includes:

- Student email accounts (Microsoft – Office 365)
- Originality checking system ([Ouriginal](#))
- Virtual learning environment (D2L - Brightspace)
- Video library system (Medial)
- Survey system (Jisc online surveys)
- Library management system (WMS/Worldcat Discovery)
- Student portal (CollabCo)
- Alumni system (Raisers edge)
- Careers service (TARGETconnect – FutureMe, supplied by GTI)
- Virtual Classroom (Bongo)
- Virtual conference system – (Cisco Webex, including Slido)
- Core teaching technologies
- UHI NWH finance system
- UHI NWH text messaging system, used by UHI to send you text messages (PageOne), privacy notice can be accessed [here](#).
- UHI NWH may utilise the services of other companies providing ICT functionality and/or any other service to the college.
- UHI’s providers of archives systems
- UHI NWH may utilise the services of other companies, consultants or advisers to assist with any of its functions listed in this privacy notice or any of its other privacy notices. UHI NWH may change providers, including those noted in this notice, without notice.

**Your data will be retained in the college student records system in accordance with the student records system retention schedule.**

**The following rights are rights of data subjects:**

- The right to access your personal data
- The right to rectification if the personal data we hold about you is incorrect
- The right to restrict processing of your personal data

**The following rights apply only in certain circumstances:**

- The right to withdraw consent at any time if consent is our lawful basis for processing your data
- The right to object to our processing of your personal data
- The right to request erasure (deletion) of your personal data
- The right to data portability

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