



Privacy notice – HE Enrolment

The Data Controller of the information being collected is: The University of the Highlands and Islands (UHI), UHI House, Old Perth Road, Inverness. IV2 3JH Phone: 01463 279000.

UHI operates as part of the UHI partnership and may deliver any of its functions or services through any of its [Academic Partner organisations](#). Any reference in this privacy notice to ‘UHI’ processing data means ‘UHI and/or any of its Academic Partner organisations’.

For any queries or concerns about how your personal data is being processed, you can contact the relevant Data Protection Officer at dataprotectionofficer@uhi.ac.uk

This privacy statement relates to the following processing:

Higher 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 the University of the Highlands and Islands. 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.

Your information will be used for the following purposes:

Purpose 1: Academic matters	Academic matters, including: <ul style="list-style-type: none">the provision of our core teaching, learning and research services (e.g. registration, assessment, attendance, managing progression, academic misconduct investigations, certification, graduation);maintaining student records (to ensure we have the correct data for students);the production of student ID cardsAdministering any placements as part of your course As a ScotGem student we will only conduct the activities above to the extent necessary for your Scotgem placement.
Purpose 2: Student support	UHI 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 to you. UHI and its academic partner colleges will process your personal data for the purpose of student support including, but not limited to, the purposes set out below:
Purpose 2A: assessing and/or providing reasonable adjustments	Assessing and providing reasonable adjustments to allow you to undertake your placement – where the adjustments relate to UHI’s provision in respect of your placements (ICT provisioning, physical spaces). It should be noted that information about your needs may be passed to UHI where necessary by your university or ScotGem



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	administrators – Please refer to the relevant university / ScotGem privacy notice(s) for more information.
Purpose 2B: Safeguarding	<p>UHI is required to safeguard the wellbeing and safety of its students, staff and stakeholders. UHI will, or may, process your personal data where it is necessary for its safeguarding purposes you can read more about UHI’s approach to safeguarding in the UHI Safeguarding Policy. The safeguarding process may involve persons making safeguarding referrals about named individuals to us, and we need to react to protect the welfare of students, staff and stakeholders. In emergency situations, UHI may need to share personal data for this purpose with other organisations or individuals including, for example, the police or other safeguarding agencies.</p>
Purpose 3: Library and ICT	<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 here.</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 UHI’s ICT Acceptable Use Policy. UAP summary here.</p> <p>UHI records some of its taught sessions (eg lectures). Taught sessions may also be recorded by students with a PLSP requiring the recording of sessions. You can read more about taught session recording and learn how to object in the Privacy Notice - recording of taught sessions</p>
Purpose 4: Appropriate funding, fee collection and other financial matters	<p>To administer any fees owed to UHI arising from your time using UHI facilities.</p> <p>UHI 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. This may include public bodies such as SAAS or SLC or employers or other bodies paying for your course, or any other payments associated with your course.</p> <p>Assisting you with, and contacting you about, your student finance arrangements and any funding to which you may be entitled. This</p>



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	<p>may include contacting you about or assisting you with, matters that may affect your entitlement for funding.</p> <p>UHI or UHI Academic Partners may process your data, or contact you, about Important contractual matters and financial recovery. This includes sending you information about substantial matters concerning your student contract that require action or potential, or actual, financial recovery (recovering money that you owe; for example, for non-return of a library book). Noting that if you owe money to the University or a UHI Academic Partner then outstanding payments may be pursued for recovery, including potentially sharing details of monies owed to external agencies who assist with, or directly, seek to recover the owed money.</p>
Purpose 5: Academic standards	<p>Ensuring rigorous academic standards (for example checking work for originality and ensuring the correct information is present for examination boards). This may include contributing to relevant academic integrity investigations by your university / ScotGem. For information please refer to the relevant university / ScotGem privacy notice(s).</p>
Purpose 6: Identity verification	<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, or your academic partner, may provide you with university/college ID cards for this purpose. This is to ensure that only individuals with a legitimate reason are on campus or participating in university activities and to detect and prevent disciplinary or academic misconduct.</p>
Purpose 7: Emergency communications	<p>We may need to contact you, 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 (such as COVID restrictions).</p> <p>We will send these text message communications 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 here.</p>
Purpose 8: Contacting you	<p>UHI and its academic partners may contact you by email regarding any of the other purposes in this privacy notice, any other matter associated with your studies at UHI, or for any emergency purpose. In addition to emails, UHI and its academic partners may contact you by text message for some reasons. More information about text messaging is included in UHI's Text messaging privacy notice. UHI will also write to you as it requires, including sending you important documents about your studies such as academic transcripts and certificates.</p>



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Purpose 9: Equalities Monitoring and Reporting	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 when you apply/enrol.
Purpose 10: Academic and conduct Investigations (and complaints)	<p>UHI sets standards and rules concerning the conduct of university staff and students. These include all university policies, procedures, and guidance. The university may need to process the 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 halls. The university may investigate where it has reason to suspect rules may have been broken or where it receives a complaint. Where UHI 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 may investigate under different rules, regulations, and policies as required in the circumstances. Policies and regulations - Policies (uhi.ac.uk)</p> <p>UHI and its academic partners operate processes for handling complaints. UHI and partners may receive your personal data when you make a complaint and will use your data to handle, investigate and respond to your complaint. This may involve details of your complaint, including your data, being shared with partners within and outwith the UHI partnership as required. Others may also be informed of details of your complaint (including details that may identify you), including any person you may have complained about, who may be a witness or may otherwise be pertinent to the investigation or complaint resolution. Complaints information may be shared with the Scottish Public Services Ombudsman as required.</p>
Purpose 11: References and qualification/ academic history checks	<p>If you apply to volunteer/work for, study at, or engage with organisations then they may ask UHI to verify your qualifications, and academic history or may ask UHI for a reference. UHI may also procure such references from other organisations where relevant to your applications or other matters. UHI provides references in confidence to those who seek them.</p> <p>As you are part of the ScotGem programme UHI may report relevant matters, on request to your funder/university/ScotGem. Please refer to the relevant university/ScotGem privacy notice(s).</p>



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Purpose 12: Quality assurance and improvement	UHI is required to maintain high standards of education and student service and always seeks to improve its services. To do this UHI may use personal data about students, or send surveys, to gauge its quality standards and gather opinions or information that can help it improve its services. This includes the annual ESES survey .
Purpose 13: Research and development	<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. Wherever possible anonymised data will be used rather than personal data.</p>
Purpose 14: Archiving	UHI may archive material that is of cultural, scientific or statistical significance or which constitutes a part of the University's record of its business. UHI will, or may, archive student dissertations.

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 10: Academic and conduct investigations Purpose 12: 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 university and its students, research staff and other parties to provide educational and other products and/or services and ensuring you can take part in key aspects of your course, or a contract with UCAS.

To achieve the following purposes: Purpose 2: Student support, Purpose 4: Appropriate funding and fee collection, Purpose 5: Academic standards Purpose 6: Identity verification, Purpose 7: Emergency communications, Purpose 9: Equalities Monitoring and Reporting, Purpose 10: Academic



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and conduct investigations Purpose 12: 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 that the university's 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 university / Academic Partner'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 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 2: Student support, Purpose 3: Library and ICT, Purpose 6: Identity verification, Purpose 10: Academic and conduct investigations Purpose 12: Quality assurance and improvement Purpose 11: References and qualification/ academic history checks, Purpose 13: Research and development Purpose 14: 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 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. UHI has a public task to conduct 'quality, fundable research'.

To achieve the following purposes: Purpose 8: Contacting you Purpose 12: Quality assurance and improvement Purpose 11: References and qualification/ academic history checks

Our legal reason to use the data is: UHI and its [academic partners](#) will contact you for a number of different reasons, the lawful basis will be associated with the purpose for which UHI is contacting you. Contacting for any reason in this notice will be under the same lawful basis as that purpose. In addition, UHI and its academic partners may contact you by text message – more information about contacting you by text message, including the lawful bases, is included in the



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[UHI text messaging privacy notice](#). UHI 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 will also process your data for the purpose of providing references to other organisations regarding your academic or qualification history and interactions with UHI and Academic Partners. The basis for this will depend on the nature of the request and UHI'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 9: Equalities Monitoring and Reporting

Use is necessary for UHI 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 10: Academic and conduct investigations & Purpose 5: Academic standards

To ensure investigations are fair, the university 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 university will consider the lawfulness of processing this information based on the specific circumstances of the case.

Purpose 13: 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 university would be unable to deliver teaching or provide student services (including ICT and identity verification); your university account may be cancelled.



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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 university or indirectly through another party (that may be you). If you have entered into an agreement that requires UHI to share your data with that funding body (or another party they nominate) then UHI may share your data with that body.
- **Higher Education Statistics Agency (HESA) – now part of JISC.** Information about HESA's data protection, including their privacy notices relevant to the purposes for which the data is shared with HESA, is available [here](#).
- **Student Awards Agency for Scotland (SAAS)** Information about SAAS's data protection, including their privacy notices relevant to the purposes for which the data is shared with SAAS, is available [here](#).
- **Student Loans Company (SLC)** Information about SLC's data protection, including their privacy notices relevant to the purposes for which the data is shared with SLC, is available [here](#).
- **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](#).
- **Nursing and Midwifery Council (NMC)** (students of the Nursing and Midwifery department should read this [privacy notice](#)). Information about NMC's data protection, including their privacy notices relevant to the purposes for which the data is shared with NMC, is available [here](#).
- **General Dental Council (GDC)** Information about GDC's data protection, including their privacy notices relevant to the purposes for which the data is shared with GDC, is available [here](#).
- **Chartered Management Institute (CMI)** Information about CMI's data protection, including their privacy notices relevant to the purposes for which the data is shared with CMI, is available [here](#).
- **General Teaching Council for Scotland (GTCS)** If you are studying on a teaching course then data may be shared to and from the GTCS. Information about GTCS's data protection, including their privacy notices relevant to the purposes for which the data is shared with GTCS, is available [here](#).
- **Local authorities (including LA schools and administrators) and/or independent schools** If you are studying on a course that involves teaching placements then your data will be shared for the purposes of applying to, administering and delivering your teaching placements. This will include, but not be limited to, two-way sharing of your personal data

including, to the extent necessary, information about you, your performance and progress, health and safety requirements, learning or accessibility requirements or information (Including PLSPs), the administration of any complaints or regulatory investigations.

- **General Optical Council (GOC)** Information about GOC's data protection, including their privacy notices relevant to the purposes for which the data is shared with GOC, is available [here](#).
- **Health and Care Professionals Council (HCPC):** For students on courses requiring, or leading to, HCPC registration or practice regulated by HCPC. The HCPC's privacy notice 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, HNC Social Services, Leading and Managing Care Services, Health and Social Care Supervision, All SVQs where staff are employed in Social Service.
- **European Aviation Safety Authority/Civil Aviation Authority:** For students studying with Air Services Training (AST) at UHI Perth / Perth College. The CAA's general privacy notice is available [here](#). A list of EASA's operations and privacy notices is available [here](#).
- **Professional Golfers' Association (PGA):** For Golf courses, including Professional Golf. The PGA's Privacy Notice is available [here](#).
- **British Psychological Society (BPS):** In certain cases UHI may need to share personal data with the BPS about students. For example, certain disciplinary matters (academic or otherwise) may need to be reported to the BCS if they meet the appropriate threshold. For more information, please contact your course leader and/or the BPS. Relevant courses include MSc Psychology Conversion and BSc Psychology. The BPS Privacy Policy is available [here](#).
- **British Association for Counselling and Psychotherapy (BACP)** For students on courses fully or partly accredited, supervised, or examined by the BACP. Or for courses that require a counselling, phytotherapy, or other placement or practice that is, or can be, regulated by the BACP. Or courses that require, at any stage, registration with the BACP or lead to registration with the BACP.
- **Any other relevant professional body** Many UHI courses are regulated, delivered or accredited with or by professional or trade bodies. Where UHI has such a relationship with such a body it may share your personal data with those bodies for the purposes of course accreditation, invigilation, moderation, external examination checks, co-delivery or regulatory requirements.
- **Any other relevant awarding body** Some UHI 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 (for full-time student potential application of council tax discount)**
- **UCAS** If you are a full-time Higher Education student (HNC, HND or degree level) and you applied to the university directly then your data will be shared with UCAS. The UCAS privacy notice is available [here](#). Please also read the UCAS declaration [here](#).
- **Aberdeen University (for post-graduate research students)**
- **Ipsos Mori (for the National Student Survey)**



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- **External examiners** UHI is sometimes required to use the services of external examiners to examine or moderate student work. Your data may be shared with external examiners for this purpose.
- **Any placement providers and their parent organisations** If you apply for, or take part in, any placements as part of your course then data may be shared with your placement provider and its suppliers/parent organisations as appropriate.
- **Recruitment agencies or international agencies** If you applied to, or enrolled with, the university via an arrangement with a recruitment or international agency then data may be shared with that agent where necessary for the purposes of a contract with that agency.
- **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 to verify your qualifications, academic history or may ask UHI for a reference.
- **Debt recovery agencies** If you owe money to UHI or a UHI Academic Partner and that money is due then details of the money you owe may be passed to UHI's debt recovery partners who assist with, or directly, seek to recover the owed money.
- **Occupational Health provider:** for courses requiring fitness to practice assessment, your data will be shared with UHI's (or UHI Academic Partners') occupational health service provider. Information may be provided back to UHI ((or UHI Academic Partners') from the occupational health service
- **Postal services:** UHI may need to send you letters or documents by post. UHI may need to supply details to these providers to post items to you.
- **Digimap/Edina/University of Edinburgh:** For provisioning accounts for the Digimap online maps tool [Privacy Notice \(edina.ac.uk\)](https://www.edina.ac.uk/Privacy-Notice).

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 accounts, office software and other Microsoft software and services (Microsoft, including MS Office 365, MS Edge other MS tools and services)
- School of Health placements (Quantum IT - In Place)
- Originality checking system (Turnitin LLC)
- Virtual learning environment (D2L - Brightspace)
- Video library system (Medial)
- Survey system (Jisc online surveys)
- Library management system (WMS/Worldcat Discovery)
- Module Reading List Software (Talis Aspire)
- Student portal (CollabCo)
- Alumni system (Raisers edge)
- Careers service (Handshake - FutureMe) - career development platform providing students with access to the UHI Careers Centre for personalised career support and enables students and employers to network and connect with each other. The platform is a modern and intuitive interface between students, the university and employers.



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- Virtual Classroom (Bongo)
- Virtual Classroom (Blackboard Collaborate)
- Research manager and ethics approval system (Haplo)
- Virtual conference system – (Cisco Webex, including Slido)
- Core teaching technologies
- UHI's finance system, and finance systems of its Academic Partners.
- UHI's text messaging system, used by UHI to send you text messages (PageOne), privacy notice can be accessed [here](#).
- UHI may utilise the services of other companies providing ICT functionality and/or any other service to the University and/or colleges.
- UHI's providers of archives systems
- UHI's providers of research management and administration systems
- UHI or AP's providers of printing and reprographics services, including the printing of student ID cards
- UHI 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 may change providers, including those noted in this notice, without notice.

Your data will be retained in the university student records system and accordance with the student records system retention schedule; a summary of which can be accessed at <https://www.uhi.ac.uk/en/students/support/student-records/why-we-collect-data-about-you/>

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.