



Student Records

Privacy Notice – FE Enrolment

The Data Controller of the information being collected is: UHI Shetland, Gremista, Lerwick, Shetland ZE1 0PX 01595 771000

For any queries or concerns about how your personal data is being processed you can contact the Data Protection Officer at dataprotectionofficer@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 Shetland. 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 college.

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 and learning services (e.g., registration, assessment, attendance, managing progression, academic misconduct investigations, certification, prizegiving).• Maintaining student records (to ensure we have the correct data for students). This may include the use of a personal e-mail address where a college e-mail account has been closed due to withdrawal.• The production of student ID cards.• Assessing your eligibility for bursaries and other grants (confirming mode of attendance, start date, personal details).• Administering any placements as part of your course• Providing you with certificates
Purpose 2: Student Support	UHI Shetland 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. UHI Shetland will process your personal data for the purpose of student support including, but not limited to, the purposes set out below (Purposes 2A-2J)
Purpose 2A: Student support	Providing student support services, including: <ul style="list-style-type: none">• Personal academic support (Personal Academic Tutors (PATs and equivalent staff e.g., LDWs and PDAs).• Providing pastoral care to students• Providing general student support services
Purpose 2B: Learning support	Supporting students who may require a Personal Learning Support Plan (PLSP) – More information and privacy notice
Purpose 2C: Support for vulnerable and priority groups	UHI Shetland is required provide certain priority groups of students with proactive assistance. 1) Proactive contact and support for care experienced students – More information and privacy notice

	<p>2) Proactive contact and support for estranged students – More information and privacy notice</p> <p>3) Proactive contact and support for student carers – More information and privacy notice</p>
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 Shetland offers Counselling services to students. Please contact your student support team for more information.
Purpose 2F: Mental Health and Wellbeing support	<p>Providing specific student support services such as mental health and wellbeing support. UHI Shetland delivers some of these services directly and sometimes by arrangement with external providers such as:</p> <ul style="list-style-type: none"> • Togetherall • SpectrumLife
Purpose 2G: Occupational Health services	<p>Some courses require that you undertake an occupational health assessment to make sure you can safely take part in the course (or alternative or adjusted activities based on your assessment). Outcomes from your assessment may be shared with UHI Shetland and used to consider whether you can take part in the courses, and what adjustments can be made to help you take part. UHI Shetland may deliver this service through an external organisation</p>
Purpose 2H: Gender Based Violence (GBV) support	UHI Shetland seeks to reduce GBV on our campus, protect our students, and provide support to victims of GBV. UHI Shetland student support services offers GBV support
Purpose 2I: Careers and Employability support	UHI Shetland provides a Careers and Employability support service available to all UHI Shetland students. We process some of your data to administer the function and deliver the service to you. You can access the UHI Shetland Careers service here .
Purpose 2J: Safeguarding	UHI Shetland is required to safeguard the wellbeing and safety of its students, staff and stakeholders. UHI Shetland will, or may, process your personal data where it is necessary for its safeguarding purposes. You can read more about UHI Shetland's approach to safeguarding in our 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.
Purpose 2K: Transport support	You may be entitled to assistance with transport to attend college. If you qualify for this assistance then your personal data may be processed for the college to plan and administer this assistance. The assistance may take the form of financial assistance or direct assistance with travel tickets or planning transport for you directly. Your data may be shared with transport providers or agents who will administer your transport support on behalf of the college.
Purpose 3: Library and ICT	Providing library, IT and information services (for example, access to email, virtual learning environment, library systems and out of hours).

	<p>As part of this your name, student number, and university email address will be included on UHI Shetland email address list which is available to all UHI partnership staff, students and HISA staff. This allows staff and peers to email you and allows you to contact peers and staff.</p> <p>More detail on data processing in the UHI VLE Brightspace is available here. 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 University partnership IS Acceptable Use Policy.doc (sharepoint.com).</p> <p>UHI records some of its taught sessions (e.g., 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 Privacy Notice - recording of taught sessions - Mahara (uhi.ac.uk)</p>
<p>Purpose 4: Appropriate funding and fee collection</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 loans) can be administered in conjunction with SAAS, SLC and/or any other funding provider (private or public bodies). To facilitate the administration and collection of students fees, including contacting you, or the person paying your fees, regarding fee payments.</p> <p>UHI Shetland may pass your personal data, including details about payments or monies owing to debt collection agencies in certain circumstances. 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. 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>UHI Shetland 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>
<p>Purpose 5: Statutory Returns and Statistics</p>	<p>Other administrative purposes, including carrying out internal statistical analysis for academic standards, student support, quality assurance and enhancement, business management and improvement purposes. Also, creation and submission of statistical</p>

	returns to external bodies, such as HESA, JISC, and SFC (more information in the data sharing section of this notice)
Purpose 6: Academic Standards	Ensuring rigorous academic standards (for example checking work for originality and ensuring the correct information is present for examination boards).
Purpose 7: Protecting vulnerable groups and others	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.
Purpose 8: Identity verification	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.
Purpose 9: Alumni Association and alumni relations	To keep in touch with our former students and maintain a mutually beneficial relationship we may need to contact you via surveys, newsletters or other forms of communication deemed appropriate. Our alumni privacy notice can be found here .
Purpose 10: Emergency communications	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). 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). The full privacy notice on texting students can be accessed here .
Purpose 11: Contacting you	UHI Shetland may contact you by email regarding any of the other purposes in this privacy notice, any other matter associated with your studies at UHI Shetland, or for any emergency purpose. In addition to emails, UHI Shetland may contact you by text message for some reasons. More information about text messaging is included in the UHI Text messaging privacy notice . UHI will also write to you as it requires, including to send you important documents about your studies such as academic transcripts and certificates.
Purpose 12: 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 13: Academic and conduct investigations (and complaints)	UHI Shetland sets standards and rules concerning the conduct of college staff and students. These include all college policies, procedures and 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 (e.g., 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'

	<p>section of this notice). You may also be subject to additional rules if you live in college residences. The college may investigate where it has reason to suspect rules may have been broken or where it receives a complaint. Where UHI Shetland 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 Shetland may investigate under different rules, regulations, and policies as required in the circumstances. Key information regarding expectations of behaviour can be found here.</p> <p>UHI Shetland operates processes for handling complaints and the complaints handling policy can be found here. UHI Shetland 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 14: 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 Shetland to verify your qualifications, academic history or may ask UHI Shetland for a reference. UHI Shetland may also procure such references from other organisations where relevant to your applications or other matters. UHI Shetland provides references in confidence to those who seek them.</p>
Purpose 15: Quality assurance and improvement	<p>UHI Shetland is required to maintain high standards of education and student service, and always seeks to improve its services. To do this UHI Shetland 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</p>
Purpose 16: Research and development	<p>UHI Shetland, as a member of the UHI Partnership, has a public task to conduct research. Such research may be to investigate matters with a view to publishing results that contribution to fields of study and society in general or to contribute to the quality assurance and enhancement of UHI Shetland services (or both). Such research may be undertaken by, or with, UHI Shetland or any of its academic partners. UHI Shetland may also conduct research with other bodies. UHI Shetland 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 Shetland will also conduct research about its own services and functions to help understand and improves 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 17: Archiving	UHI Shetland may archive material that is of cultural, scientific or statistical significance or which constitutes a part of the University's record of its business.
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Our legal reason for using the data 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 5: returns and statistics, Purpose 13: Academic and conduct investigation, Purpose 15: Quality Assurance and improvement

Our legal reason to use the data is: Use as 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 as 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 college's academic standards and funding arrangements 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 Shetland may send you surveys or use data for quality assurance and improvement purposes based on its legal obligations to maintain and improve standards of 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 5: Statutory returns and statistics Purpose 7: Protecting vulnerable groups and others, Purpose 8: Identity verification, Purpose 14: References and qualification/ academic history checks, Purpose 15: Quality assurance and improvement, Purpose 16: Research and development, Purpose 17: Archiving

Our legal reason to use the data is: Use as necessary for performing a task in the public interest or under official authority vested in us. That being the college'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 Shetland may send you 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 14: References and qualification/academic history checks, Purpose 15: Quality assurance and improvement,

Our legal reason to use the data is: UHI Shetland may contact you for a number of different reasons, the lawful basis will be associated with the purpose for which UHI Shetland is contacting you. Contacting for any reason in this notice will be under the same lawful basis as that purpose. In addition, UHI Shetland 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 Shetland may send you 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 Shetland 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 our reasons for responding.

The data we use includes special category (sensitive) data. You are not obliged to provide this information.

Our legal reason for using this sensitive data, as provided, is:

Purpose 12: 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 13: Academic and conduct investigations & Purpose 6: Academic standards

To ensure investigations are fair, the college 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 Shetland 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 Shetland as a matter of substantial public interest, that being statutory purposes as UHI Shetland is required, by law, to undertake such checks and protect the public.

UHI Shetland 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 Shetland 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 contact your local Academic Partner, contact details can be found at [Student admissions, registry and fees - Contact Details \(uhi.ac.uk\)](https://uhi.ac.uk/student-admissions-registry-and-fees)

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 Shetland 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 Shetland may need to process special category data for its research purposes in the public interest. UHI Shetland 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:

The college would be unable to process your enrolment on your course. This would mean that 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 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, are available here [@ Highlands and Islands Students' Association \(uhi.ac.uk\)](http://uhi.ac.uk/Privacy)
- Scottish Funding Council (SFC) including Assigned Auditors. 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](#).
- Scottish Government
- Colleges Scotland
- Education Scotland
- Skills Development Scotland (SDS)
- Shetland Island Council including Schools – only if you are a school pupil enrolling on a school/college partnership programme
- Community Planning Partners for ESOL provision
- Awarding bodies associated with your studies (for example: SQA, City and Guilds; CMI, IMI)
- Employers and Managing Authorities/Agents who are supporting or funding your studies
- National Entitlement Card Programme Office (NEPCO) – should you qualify for a travel pass
- Where we are obliged to do so by law including court orders or other regulatory bodies .
- Debt recovery agencies If you owe money to UHI Shetland and that money is due then details of the money you owe may be passed to UHI Shetland'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 Shetland's occupational health service provider. Information may be provided back to UHI Shetland from the occupational health service.
- Postal services: UHI Shetland may need to send you letters or documents by post. UHI Shetland may need to supply details to these providers to post items to you.
- Transport providers or agents who will plan and administer transport support for you on behalf of the college. This may include the local authority for the areas of the college or your location, transport companies, or others who may assist in planning or delivering your transport support.

Statistical personal information will be shared with the Scottish Funding Council to allow them to allocate appropriate funding to colleges in line with Scottish Government strategies and their statutory duties. For more information on how the Scottish Funding Council use your personal data please see their FE student privacy policy on their website [College student data \(sfc.ac.uk\)](http://College student data (sfc.ac.uk))

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:

- Microsoft for student email accounts
- Originality checking system (Turnitin LLC)
- Virtual learning environment (Blackboard)
- Video library system (Medial)
- Survey system (Bristol online surveys)
- Library management system (Sierra)
- Student portal (CollabCo)
- Alumni system (Raisers edge)
- Careers service (TargetConnect Careers)
- Virtual conference system – (Cisco Webex, including Slido) •

- Core teaching technologies
- UHI Shetland finance system, and finance systems of its Academic Partners.
- UHI Shetland text messaging system, used by UHI Shetland to send you text messages (PageOne), privacy notice can be accessed [here](#).
- UHI Shetland may utilise the services of other companies providing ICT functionality and/or any other service to the academic partners.
- UHI and UHI Shetland providers of archives systems
- UHI Shetland's providers of research management and administration systems
- UHI Shetland or AP's providers of printing and reprographics services, including the printing of student ID cards.
- UHI Shetland 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 Shetland may change providers, including those noted in this notice, without notice.

This process involves your data being sent outside of the UK. The following safeguard is in place for this international transfer:

We transfer data to the USA for Turnitin plagiarism software, the data transferred comprises:

- Student ID.
- Student's college email address.
- Student's assessment (their own work, as submitted in the course of study).

This is a system data transfer from the Virtual Learning Environment (VLE) directly to the originality software (Turnitin). This data is transferred for processing to ensure student work is original and the college is making recommendations for awards based on original student work.

This relevant protection is in place for this international transfer:

The data is transferred to Turnitin LLC in the USA under the European Commission's adequacy decision regarding the protection provided by the EU-U.S. Privacy Shield.

Your data will be retained in the UHI Shetland student records system; and attendance, tracking and monitoring systems in accordance with the UHI Shetland records management policy which can be found [here](#).

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.

The Information Commissioner's Office is Scotland's independent authority set up to uphold information rights in the public interest. Their website is [Information Commissioner's Office \(ICO\)](#).