



University of the  
Highlands and Islands  
West Highland College

Oilthigh na Gàidhealtachd  
agus nan Eilean  
Colaiste na Gàidhealtachd an Iar

# **Further Education Student Records Privacy Notices**

This document is also available in a  
larger font on request.

West Highland College UHI is a registered Scottish charity, number SC024193.

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## Privacy Notice – FE Enrolment

### The Data Controller of the information being collected is:

Data Controller, West Highland College UHI, Carmichael Way, Fort William, PH33 6FF

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](mailto: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 West Highland College UHI. 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:

<b>Purpose 1: Academic Matters</b>	Academic matters, including: <ul style="list-style-type: none"><li>• The provision of our core teaching and learning services (e.g. registration, assessment, attendance, managing progression, academic misconduct investigations, certification, prize giving).</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>• Monitoring and enhancing the student experience (through student feedback, eg complaints, surveys, Redbutton etc.)</li></ul>
<b>Purpose 2: Student Support</b>	Providing student support services (for example personal academic support, personal non-academic support and additional support for those who wish to receive it).
<b>Purpose 3: Library and ICT</b>	Providing library, IT and information services (for example, access to email, virtual learning environment, library systems and out of hours).
<b>Purpose 4: Funding and Tuition Fees</b>	To ensure appropriate student funding (for example bursaries and travel, ITA – Individual Training Accounts) can be administered; To ensure appropriate tuition fees can be administered. (where applicable)
<b>Purpose 5: Statutory Returns and Stats</b>	Other administrative purposes, including carrying out statistical analysis; statutory returns to SDS and SFC.
<b>Purpose 6: Academic Standards</b>	Ensuring rigorous academic standards (for example checking work for originality and ensuring the correct information is present for examination boards).

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: Funding and Tuition Fees

**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.

**To achieve the following purposes:** Purpose 4: Funding and Tuition Fees, Purpose 6: Academic standards

**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.

**To achieve the following purposes:** Purpose 1: Academic matters, Purpose 5: Statutory returns and stats, Purpose 2: Student support, Purpose 3: Library and ICT,

**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.

**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:**

Processing is necessary for the purposes of carrying out the obligations of the college in the field of social protection law.

All special sensitive data is stored in a secure location. Data is anonymised and used for the sole purpose of providing statistical analysis on protected characteristics to monitor compliance with the Equality Act 2010 and various Government Agendas (for example, Gender Action Plan; Widening Participation).

**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.

**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)
- Scottish Funding Council (SFC) including Assigned Auditors
- Scottish Government
- Colleges Scotland
- Education Scotland
- Skills Development Scotland (SDS)
- Highland 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)
- Employers and Managing Authorities/Agents who are supporting or funding your studies
- Where we are obliged to do so by law including court orders or other regulatory bodies (for example Managing Authorities for European Social Funded (ESF) courses)

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 <http://www.sfc.ac.uk/home/privacy.aspx>

**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)
- Alumni system (Raisers edge)

**This process involves your data being sent outside of the European Union. 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 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 student records system; and attendance, tracking and monitoring systems in accordance with the student records retention schedule; a summary of which can be accessed at:**

<https://www.whc.uhi.ac.uk/about-us/governance/policies/>

**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 UK's independent authority set up to uphold information rights in the public interest. Their website is [www.ico.org.uk](http://www.ico.org.uk)**

## Privacy Notice – Photographic Image

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### **This privacy statement relates to the following process:**

Further Education – Photographic Image

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

Your photographic image will be recorded and used for identification purposes and for providing you with a student ID badge.

Your image will be stored against your electronic student record in the university student records system, and may also be linked to your email account and your electronic college timetable.

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

- You have given consent for the use.

Your data will be retained in the university student records system and in accordance with the student records system retention schedule; a summary of which can be accessed at:

<https://www.whc.uhi.ac.uk/about-us/governance/policies/>

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

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### **This privacy statement relates to the following process:**

Further Education – Use of student data to provide information on further educational opportunities at the university.

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

Communication by authorised university staff of information about educational programmes, products or services in relation to your studies or further study and career opportunities.

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

- You have given consent for the use.

Your data will be retained in the university student records system and in accordance with the student records system retention schedule; a summary of which can be accessed at:

<https://www.whc.uhi.ac.uk/about-us/governance/policies/>

### **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.
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- The right to data portability.

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## Student Records Retention Schedule Summary

The student records system securely stores curricular and student data. The retention of this data has been summarised for students below. Personal data is only retained for as long as it is vital to university statutory requirements or services. Some data however, must be retained in order to continue to provide a service to students who have exited the university. This allows the university to be able to identify students should they return to study with us or for us to be able to provide students with replacement certificates or transcripts.

If you wish to view the full student records system retention schedule, this can be requested by contacting: [sro@uhi.ac.uk](mailto:sro@uhi.ac.uk)

<b>Data removed at the end of each academic/admissions year.</b>	
<b>End of Year</b>	UCAS Statements/Referee Information UHI Records Access Logs Non-PLSP or Funding Related Documents Uploaded via UHI Records Next of Kin Information
<b>+1</b>	Direct Debit Mandates Interview Data
<b>+2</b>	Enquiry Data
<b>Data removed at the end of course.</b>	
<b>End of Course</b>	Consent Forms (enrolment) Medical Forms
<b>+1</b>	Spoken Language Data
<b>Data removed at the end of relationship with the university partnership (when a student has stopped studying with the university at either FE or HE level).</b>	
<b>End of Relationship</b>	All Address Details (other than last home address)
<b>+1 Year</b>	Accessibility Data Student Photos Placement Data (other than UKVI students or centre for health)
<b>+6 Years</b>	Personal Student Data Remaining (other those specified as core records kept for 80 years) Mitigating Circumstance Claims/Documents Generated Letters Disciplinary Records Funding Records Research Student Records Progression Records Statutory Returns Records
<b>+6 Years or as Long as a Debt is Outstanding</b>	Records relating to student fee invoices and/or debtor records.
<b>80 Years</b>	
Core records required to identify returning students – Student ID, name, date of birth, most recent address and; Core records required to confirm awards – award records, module credits and centre for health placement records.	

**Note:** Under certain circumstances, for example United Kingdom visa and immigration (UKVI) reported students and those funded under European projects we may have to retain data out with this schedule.