

UHI | ARGYLL

Further Education Student Records

Privacy Notices

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Privacy Notice – FE Enrolment

The Data Controller of the information being collected is: **Argyll College UHI, West Bay, Dunoon, Argyll PA23 7HP. Phone: 01631 559500**

For any queries or concerns about how your personal data is being processed you can contact the Data Protection Officer at ACDPO@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 Argyll 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:

Purpose 1: Academic Matters	Academic matters, including: <ul style="list-style-type: none">• The provision of our core teaching and learning services (eg registration, assessment, attendance, managing progression, academic misconduct investigations, certification, prizegiving).• Maintaining student records (to ensure we have the correct data for students).• The production of student ID cards.• Assessing your eligibility for bursaries and and other grants (confirming mode of attendance, start date, personal details).
Purpose 2: Student Support	Providing student support services (for example personal academic support, personal non-academic support and additional support for those who wish to receive it).
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 IT support). More detail on data processing in the UHI VLE Brightspace is available here
Purpose 4: Funding and Tuition Fees	To ensure appropriate student funding (for example bursaries and travel) can be administered; To ensure appropriate tuition fees can be administered.
Purpose 5: Statutory Returns and Stats	Other administrative purposes, including carrying out statistical analysis; statutory returns to SDS and SFC.
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	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. This is to ensure that only individuals with a legitimate reason are on campus or participating in college activities and to detect and prevent disciplinary or academic misconduct.

Our legal reasons 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, Purpose 7: Protecting vulnerable groups

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 4: Funding and Tuition Fees, Purpose 6: Academic standards, Purpose 7: Protecting vulnerable groups, Purpose 8: Identity verification

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

To achieve the following purposes: Purpose 1: Academic matters, Purpose 5: Statutory returns and stats, Purpose 2: Student support, Purpose 3: Library and ICT, Purpose 7: Protecting vulnerable groups, Purpose 8: Identity verification

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).

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:

Use is necessary for the college 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. 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).

Certain courses require students to be members of the Protecting Vulnerable Groups (PVG) Scheme, which checks that you can safely work with children and/or vulnerable adults. This process involves checking for any criminal convictions or similar concerns that may influence your ability to work with vulnerable groups.

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 you can contact the college. 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.

If you were to withhold the personal information we require for this process, the consequences would be that 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)
- Scottish Funding Council (SFC) including Assigned Auditors
- Scottish Government
- Colleges Scotland
- Education Scotland
- Skills Development Scotland (SDS)
- Argyll and Bute Council, and North Ayrshire Council including Schools – only if you are a school pupil enrolling on a school/college partnership programme. Also for potential council tax discounts for full time students
- 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
- 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 (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 (D2L - Brightspace)
- Video library system (Medial)
- Survey system (JISC online surveys)
- Library management system (Sierra)
- Student portal (CollabCo)
- Alumni system (Raisers edge)
- Careers service (TARGETconnect - FutureMe)
- Disclosure Scotland
- Virtual Classroom (Bongo)
- Virtual Classroom (Blackboard Collaborate, GLOW)

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 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 student records system; and attendance, tracking and monitoring systems in accordance with the student records retention schedule; a summary of which can be accessed [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.

Privacy Notice – Photographic Image

The Data Controller of the information being collected is: Argyll College UHI, West Bay, Dunoon, PA23 7HP. Phone: 01631 559500

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

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. We will share your data with the National Entitlement Card Programme (NEPCO) should you qualify for a travel pass.

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.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.

Privacy Notice – Marketing Information

The Data Controller of the information being collected is: Argyll College UHI, West Bay, Dunoon, PA23 7HP. Phone: 01631 559500

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

This privacy statement relates to the following process:

Further Education – Use of student data to provide information on further educational opportunities at the Argyll College UHI and at the University of the Highlands and Islands.

Your information will be used for the following purposes:

Communication by authorised college and 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.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.

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 college and 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 college or university. This allows the college or 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

Student Records Data Retention Summary

Retention period:

- 7 years after end of relationship for non-European project funded students.
- European Funded students:
 - o 2007-2013 Investing in Recovery programme: 31/12/22 (requires review from ESF team before final deletion)
 - o Current ESF project: 31/12/30

Student data includes:

- Course applications
- Finance application details
- Fees data
- Student Records timetabling and absence
- Module/unit registrations
- Course enrolments
- Forms completed on UHI Records
- Personal characteristic data
- Address and contact details
- Student support plans
- Generated correspondence and uploaded documents
- Awards

End of relationship is defined as the last meaningful contact with the institution which may be, depending on the student circumstances:

- Clearing of student debt where a debt exists,
- Award
- Enrolment
- Successful application to a course- but did not start the course.

Direct applications will be removed annually, and an anonymised applicant statistical report will be made available to staff before data is removed.

Technical Data

Retention period: 90 days

Technical data is captured when student or staff perform activities in UHI Records or SITS client and when people attempt to log into the system. These can include details such as:

- IP address
- Browser type
- Dates of activities
- Programmes accessed
- Transaction details

SQA return data

Details of interactions between UHI and partners and SQA are held in several auditing tables. Data within these tables will be removed annually in agreement with partners.

Cut-off date

Archiving activities will be based on a cut-off date of 1st November each academic year. Once data has been removed from SITS a transcript will be available for the student on the University's archiving solution. Access to the archiving solution is limited to a few named individuals at each of the partners.

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.