

Privacy Notice – Foundation Apprenticeship

The Data Controller of the information being collected is: Sabhal Mòr Ostaig, Teangue, Isle of Skye, IV44 8RQ. Tel: 01471 888 000.

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

This privacy statement relates to the following processing:

Foundation Apprenticeship Application and Enrolment

This process involves the collection of data to enable an application, registration, invitation to interview where appropriate, and enrolment to the Foundation Apprenticeship courses at Sabhal Mòr Ostaig.

Your information will be used for the following purposes:

Purpose 1: Academic matters	Academic matters, including: • 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 cards
Purpose 2: Student support	Providing student support services (for example personal academic support (PAT) 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 course materials and library services)
Purpose 4: Appropriate funding	To ensure appropriate funding for the College through the Scottish Funding Council and to facilitate the administration and collection of student fees.
Purpose 5: Returns and statistics	Other administrative purposes, including carrying out statistical analysis for quality assurance and enhancement, business management and improvement purposes. Also creation and submission of statistical returns to external bodies such as HESA and SFC.
Purpose 6: Emergency communications	We may need to contact you, by phone, 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). Any text message communications will be to the mobile phone number you provide to us (If you have provided one). The full privacy notice on texting students can be accessed here .
Purpose 7: Contacting you	Sabhal Mòr Ostaig and its academic partners may contact you by email regarding any of the other purposes in this privacy notice, or any other matter associated with your studies at Sabhal Mòr Ostaig. In addition to emails, Sabhal Mòr Ostaig and its academic partners may contact you by text message

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	for some reasons. More information about text messaging is included in this text messaging privacy notice .
Purpose 8: 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 Sabhal Mòr Ostaig when you apply/enrol.
Purpose 9: Conduct investigations	Sabhal Mòr Ostaig sets standards and rules concerning the conduct of their staff and students. These include all college policies, procedures and guidance. Sabhal Mòr Ostaig may need to process personal data of students to investigate potential breaches of its standards or rules. You may be subject to additional rules if you stay on the Sabhal Mòr Ostaig campus. Sabhal Mòr Ostaig may investigate where it has reason to suspect rules may have been broken or where it receives a complaint. Where Sabhal Mòr Ostaig 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. Sabhal Mòr Ostaig may investigate under different rules, regulations, and policies as required in the circumstances.
Purpose 10: References and qualification checks	If you apply to volunteer/work for, study at, or engage with organisations then they may ask Sabhal Mòr Ostaig to verify your qualifications, academic history or may ask Sabhal Mòr Ostaig for a reference. Sabhal Mòr Ostaig provides references in confidence to those who seek them.
Purpose 11: Quality assurance and improvement	Sabhal Mòr Ostaig is required to maintain high standards of education and student service, and always seeks to improve its services. To do this Sabhal Mòr Ostaig may use personal data or send surveys to gauge its quality standards and gather opinions or information that can help it improve its services.
Purpose 12: Emergency contact details	The information provided will be held securely and only accessed in the case of an emergency. Its purpose is to allow contact to be made with, and up to date information given to, a nominated contact point in the event of an emergency involving you. You must gain the consent of your emergency points of contact to use their personal information.
Purpose 13: Booking accommodation and travel	To allow the booking, administration and payment of travel and accommodation where appropriate and where eligible during your course.
Purpose 14: Protection of Vulnerable Groups (PVG) Scheme and Disclosure checks	• Disclosure and PVG checks where required for your employment role. • This may also include reports to PVG and disclosure agencies where required by law, ordinarily Disclosure Scotland.

Our legal reason for using the data are:

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To achieve the following purpose:

Purpose 1: Academic matters, Purpose 2: Student support, Purpose 3: Library and ICT, Purpose 4: Appropriate funding, Purpose 5: Returns and statistics, Purpose 9: Conduct investigations, Purpose 11: Quality assurance and improvement, Purpose 13: Booking of accommodation

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 Sabhal Mòr Ostaig 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.

To achieve the following purposes:

Purpose 2: Student support, Purpose 4: Appropriate funding, Purpose 6: Emergency communications, Purpose 8: Equalities Monitoring and Reporting, Purpose 9: Conduct investigations, Purpose 11: Quality assurance and improvement, Purpose 13: Booking of accommodation

Our legal reason to use the data is: Use is necessary for us to comply with a legal obligation. Those legal obligations being financial obligations; the return of statistical data and reports to satisfy various agencies that Sabhal Mòr Ostaig's academic standards and funding arrangements are sufficient and our obligations are being met. 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. To comply with legal obligations such as the Protection of Vulnerable Groups (Scotland) Act 2007 and SMO's Duty of Care. Sabhal Mòr Ostaig 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 purpose:

Purpose 1: Academic matters, Purpose 2: Student support, Purpose 3: Library and ICT, Purpose 5: Returns and statistics, Purpose 9: Conduct investigations, Purpose 10: Reference and qualification checks, Purpose 11: Quality assurance and improvement

Our legal reason to use the data is: Use is necessary for performing a task in the public interest or under official authority vested in us. That being Sabhal Mòr Ostaig'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 ensuring you can take part in key aspects of your course. Sabhal Mòr Ostaig may send your surveys or use data for quality assurance and improvement purposes based on its public task to maintain and improve standards of its work and services to students and the community.

To achieve the following purposes:

Purpose 7: Contacting you, Purpose 10: Reference and qualification checks, Purpose 11: Quality assurance and improvement

Our legal reason to use the data is: Sabhal Mòr Ostaig and its academic partners may contact you for a number of different reasons, the lawful basis will be associated with the purpose for which you are contacted. 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 [this text messaging privacy notice](#).

To achieve the following purpose:

Purpose 12: Emergency contact details

Our legal reason to use the data is: Use is necessary for the purposes of legitimate interests pursued by Sabhal Mòr Ostaig.

The legitimate interest of the controller is: The ability to contact a nominated person in the event of an emergency.

The data we use includes special category (sensitive) data. We use this sensitive data under the following legal condition(s):

Purpose 2: Student support

As part of your 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 the Post-16 Education Act, Equality Act, Children and Young peoples' Act, General duty of care, Mental Health (Scotland) Act.

Purpose 5: Returns and statistics

Sabhal Mòr Ostaig 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 and EU legislation for the provision of the European Social Fund.

Purpose 8: Equalities Monitoring and Reporting

Use is necessary for Sabhal Mòr Ostaig to comply with a legal obligation (social protection law) 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. All special sensitive data is stored in a secure location.

Purpose 9: Conduct investigations

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

Purpose 14: Protection of Vulnerable Groups (PVG) Scheme and Disclosure checks

Potentially, personal data relating to criminal convictions and offences, or related security measures may be used. Use is necessary for compliance with social protection law and statutory purposes in the

public interest, in this case the provisions of the Protecting Vulnerable Groups (Scotland) Act 2007 and SMO's Duty of Care.

If you were to withhold the personal information we require for the enrolment process, the consequences would be:

Sabhal Mòr Ostaig would be unable to process your enrolment on your course. This would mean Sabhal Mòr Ostaig would be unable to deliver teaching or provide student services; your college account would be cancelled and any funding or bursary applications you may have made will be delayed or cancelled. Sabhal Mòr Ostaig would be unable to contact a nominated person for you in the event of an emergency.

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

- Skills Development Scotland, a privacy notice for which can be found [here](#).
- Scottish Qualifications Authority (SQA), a privacy notice for which can be found [here](#).
- The University of the Highlands and Islands partnership colleges and learning centres.
- 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](#).
- Higher Education Statistics Agency (HESA) 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](#).
- 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 Sabhal Mòr Ostaig to verify your qualifications, academic history or may ask Sabhal Mòr Ostaig for a reference.
- E-portfolio system providers.

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:

- Survey system (Bristol online surveys)

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 from Student Records at the UHI Central Office. Tel: 01463 279 000 or contact them online [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 UK's independent authority set up to uphold information rights in the public interest. Their website is www.ico.org.uk