

Privacy Notice – Collection of your personal data for Skills Development Scotland apprenticeships reporting requirements

Who we are

The **University of the Highlands and Islands Work-based Learning Hub** ('WBL Hub') works with UHI colleges across the region to deliver Foundation, Modern and Graduate Apprenticeship programmes.

What this Privacy Notice is for

The WBL Hub enters into funding contracts with **Skills Development Scotland** (SDS) for the delivery of apprenticeships, and is therefore responsible for providing SDS with certain information, including personal data about you.

SDS is the 'Data Controller' for this data, which means SDS decides why your data is required, how it must be collected and processed, and what it will be used for. For further information about how your personal data is being processed by SDS please refer to the appropriate SDS Privacy Notice, which will be available for you in hardcopy when you start your apprenticeship, and is online at: <https://www.skillsdevelopmentscotland.co.uk/about/policies/privacy>.

The WBL Hub, your local UHI college, and/or any other training provider sub-contracted to deliver your apprenticeship, are a Data Processor or Data Sub-Processor for this personal data, acting solely on behalf of SDS, and for the purposes of this Privacy Notice will be referred to collectively as 'UHI'.

This Privacy Notice explains how the personal data you provide to UHI for the fulfilment of SDS apprenticeship reporting requirements to SDS will be managed.

The particular personal data this Privacy Notice refers to is that which you are asked to provide when completing SDS apprenticeship documents and reporting including:

- SDS Learner Registration Forms and/or Training Agreements
- SDS Proof of ID/Address requirements
- SDS Equality Monitoring Forms
- SDS Individual Training/Learning Plans
- SDS Progress Reviews
- SDS Work-based Learning Forms
- SDS Foundation Apprenticeship Delivery Variation Form
- SDS Travel Application Forms
- SDS Leaver forms/data
- SDS Destinations/outcomes evidence

This Privacy Notice only covers data provided for the purposes listed above to fulfil specific SDS reporting requirements, and does not cover any other instances of information being collected from you by UHI for any other part of application, enrolment and/or participation as a UHI student.

How we use your information

There must be a clear legal reason for UHI collecting and using any personal data. In this instance the information UHI collects from you is in our role as a Data Processor, and is necessary as part of our contractual obligations to SDS. If you withhold the information we require you will not be able to participate in your apprenticeship.

UHI will do the following things with your data:

1. Pass it securely to the Data Controller, SDS. This includes inputting the data you provide within the SDS documentation into the SDS 'FIPS' database, and uploading scanned copies of the documentation you provide into FIPS as reporting evidence.
2. Extract certain data that we have input into the SDS FIPS database as reports for UHI internal management and monitoring to support the delivery of our apprenticeship programmes and ensure we can fulfil our SDS apprenticeship contractual and funding requirements. However, we will never use any of the equality monitoring data you provide us with in this way.

UHI will not use the personal data you provide for any other reason, even if it is the same or similar to information you have provided to us for a different purpose (e.g. in a UHI application form)

Why we collect sensitive data about you

As part of our reporting, SDS requires that we collect some sensitive personal information from you, including your race/ethnic origin, religion, health, and sexual orientation.

In our role as a Data Processor UHI collects this data solely on the instruction of SDS. For information about why SDS is collecting and using this data please refer to the appropriate SDS Privacy Notice.

How long we keep your data

Your data will be securely retained by UHI in line with SDS record keeping requirements until such time as SDS instructs us to delete or destroy it. SDS have indicated that, due to European funding audit requirements, this is likely to be until 31st December 2027.

Your rights as a data subject

You have the right to access your personal data. You have the right to rectification if the personal data we hold about you is incorrect. You have the right to lodge a complaint with the Information Commissioner's Office about our handling of your data.

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

A digital version of this Privacy Notice is also available at: www.uhi.ac.uk/sds-privacy