

## **Privacy Notice – Enrolment - Additional processing for Optometry students**

The Data Controller of the information being collected is: The University of the Highlands and Islands (UHI), Executive Office, 12B Ness Walk, Inverness IV3 5SQ. Phone: 01463 279000.

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

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

The GOC, your placement provider, and UHI all have responsibilities under the Health and Safety at Work Act 1974, RIDDOR Regulations, and GOC regulations / Optician's Act 1989. These obligations set out a range of requirements for all parties to keep you, and others, safe and to ensure placements are carried out with due academic and practice standards. Any personal data that is necessary for any of these purpose will, or may, be process and/or shared with any other relevant body.

<b>Purpose 1: Occupational Health Service for Optometry Students</b>	Optometry students are required to undertake occupational health assessments to make sure they can safely undertake the course and interact with patients. This is a requirement of Health and Safety law and a recommendation of the General Optical Council (GOC) designed to keep you and patients safe and well.
<b>Purpose 2: Optometry placements administration</b>	The Optometry course includes compulsory work placements. Your data will be used to administer your placements with your placement organisations; such as independent and multiple optician practices, hospital eye services, NHS Education for Scotland, NHS boards. In your fifth year placements may be administered by NHS Education for Scotland.
<b>Purpose 3: General Optical Council Registration</b>	It is a condition of the GOC that students studying Optometry and Independent Prescribing register as a student with the GOC at all times. Your data may be shared with the GOC for this purpose, including verifying your registration and sharing relevant information as required by the conditions of your registration. You can read more about the conditions of your GOC registration, including potential data sharing, at the <a href="#">GOC website</a> .
<b>Purpose 4: Funding administration</b>	Optometry students often receive funding from SAAS, or other funding bodies (eg Student Loans Company), for their course. If you receive funding from SAAS, or another funding body, your data will, or may, be shared with SAAS, or the other funding body, in keeping with your funding agreement.
<b>Purpose 5: Progress reports to funding bodies</b>	Students supported and funded by private or NHS organisations or funding bodies will normally have some, or all, of their course fees paid by their funders. If your fees are paid by a funder, your data, including course progress, will, or may, be shared with the funder in keeping with your funding agreement.

<b>Purpose 6: Provision of uniform</b>	Optometry students are required to wear appropriate uniforms during their placements and in patient/volunteer clinics. UHI will process your data to arrange uniforms for you on placements, the data will include your name and uniform size.
<b>Purpose 7: Health</b>	The GOC mandates that UHI monitor students' character, physical health, and mental well-being throughout their studies, and being able to intervene to provide support when required, having the appropriate support mechanisms in place. Your data may be shared or processed as required to comply with these requirements.
<b>Purpose 8: Reporting of completion to relevant regulatory bodies</b>	<p>Upon completion of your course, UHI will inform your relevant professional body so that they may update their records and registers in keeping with their regulations and obligations. The appropriate professional bodies may include:</p> <ul style="list-style-type: none"> <li>• General Optical Council (GOC)</li> <li>• NHS Education for Scotland (NES)</li> <li>• College of Optometrists</li> </ul>

**Our legal reasons for using the data are:**

<b>Purpose:</b>	<b>Lawful basis for processing:</b>
<b>Purpose 1: Occupational Health Service for Optometry Students</b>	<p><b>Legal obligation</b> – The processing necessary for UHI and any placement providers to meet their legal obligations to keep students/staff/patients safe under their duties of care and the Health and Safety at Work Act 1974.</p> <p><b>Contract</b> – The processing is required for UHI to provide you with the relevant learning experience pursuant to your student contract.</p>
<b>Purpose 2: Optometry placements administration</b>	<p><b>Public Task:</b> Placements are an essential part of the course and form a part of the provision of education that is UHI's Public Task.</p> <p><b>Contract:</b> The processing is required for UHI to provide you with the relevant learning experience pursuant to your student contract.</p> <p><b>Legal obligation:</b> To administer and deliver placements in a safe fashion for patients, students, and staff. To administer and deliver placements in keeping with GOC guidelines and requirements – including reporting such information to GOC as is required.</p>
<b>Purpose 3: General Optical Council Registration</b>	<b>Legal obligation &amp; Public Task:</b> UHI may share the necessary student data in order to verify registration status and as required by the conditions of your registration. UHI submit student data to NES at certain points during the student's education under its public task as a university delivering the course leading to registration. NES supports the student's future registration by facilitating the foundation training year, processing relevant information, and transferring it to UHI. Including the university's public tasks under the Further and Higher Education (Scotland) Act.
<b>Purpose 4: Funding administration</b>	<b>Contract and public task:</b> The processing is necessary for performance of a contract, that contract being your funding

	contract with SAAS, or other funding body. Processing is also necessary for the university's public tasks under the Further and Higher Education (Scotland) Act.
<b>Purpose 5: Progress reports to funding bodies</b>	<b>Contract and public tasks:</b> The processing is necessary for performance of a contract, that contract being your funding contract with your funding organisations. Processing is also necessary for the university's public tasks under the Further and Higher Education (Scotland) Act.
<b>Purpose 6: Provision of uniform</b>	<p><b>Public Task:</b> Placements are an essential part of the course and form a part of the provision of education that is UHI's Public Task. Appropriate uniforms are required for placements and patient/volunteer-facing clinics.</p> <p><b>Contract:</b> The processing is required for UHI to provide you with the relevant learning experience pursuant to your student contract.</p>
<b>Purpose 7: Health</b>	<p><b>Public Task and Legal obligation:</b> The GOC mandates that UHI monitor students' character, physical health, and mental well-being throughout their studies, and being able to intervene to provide support when required, having the appropriate support mechanisms in place.</p> <p>This obligation is in place to protect staff, students, and the public. Some of the activity is undertaken by UHI under this obligation or under its public task as a university delivering the course leading to registration.</p>
<b>Purpose 8: Reporting of completion to relevant regulatory bodies</b>	<b>Public Task and Legal obligation:</b> The GOC is required by law to maintain registers of professionals, members and Optometry students. This obligation is in place to protect staff, students, and the public. Some of the activity is undertaken by UHI under these obligations or under its public task as a university delivering the course leading to registration.

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

<b>Purpose 1: Occupational Health Service for Optometry Students</b>	<p><b>Sensitive data:</b> Health data</p> <p><b>Lawful reason for processing:</b> '9(2)(b) Social protection or employment law' and '9(2)(h) Occupational medicine, for the assessment of the working capacity of the employee'</p> <p>Optometry students are required to undertake occupational health assessments to make sure they can safely undertake the course and interact with patients, implemented in response to the requirements of the GOC, and designed to keep you and patients safe and well as required by the duty of care of the organisations as well as the Health and Safety at Work Act 1974.</p>
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<b>Purpose 2: Optometry placements administration</b>	<p><b>Sensitive data: Health data</b></p> <p>Lawful reason for processing: '9(2)(b) Social protection or employment law' and '9(2)(h) Occupational medicine, for the assessment of the working capacity of the employee'</p> <p>9(2)(g) Substantial public interest – processing required by an enactment – those legal obligations being set out in the Optician's Act 1989 and put into practice by regulations set by the General Optical Council. Including, but not limited to; standards 6, 9, 11, 12 of the GOC Standards of practice for optometrists and dispensing opticians.</p> <p>UHI and your placement provider(s) are required to keep you and patients safe and well during your placement. This is an obligation under the duty of care of the organisations, the GOC Standards for Optical Students, as well as the Health and Safety at Work Act 1974.</p>
<b>Purpose 3: General Optical Council Registration</b>	<p><b>Sensitive data: personal data revealing racial or ethnic origin</b></p> <p>Your data is submitted to NHS Education for Scotland. They use this data to undertake processing required by law (Equality Act 2010) which is in the public interest. That processing may include using the data to identify and keep under review the existence or absence of equality of opportunity or treatment in the course of the NES exercising its functions.</p> <p>NHS Education for Scotland sometimes uses your data for more purposes depending on how you interact with them. More information about the use of data by NHS Education for Scotland is available from: <a href="https://www.nes.scot.nhs.uk/privacy-and-data-protection.aspx">https://www.nes.scot.nhs.uk/privacy-and-data-protection.aspx</a></p>
<b>Purpose 7: Health</b>	<p><b>Sensitive data:</b> Sometimes, you may have to disclose sensitive personal data in order to comply with our requirements for the maintenance of good health and character (including the Fitness to Practise process). It is not possible to foresee the exact sensitive data that will be required. The nature of the process means that health data or personal data relating to criminal convictions and offences or related security measures may be pertinent.</p> <p>The GOC mandates that UHI monitor students' character, physical health, and mental well-being throughout their studies, and being able to intervene to provide support when required, having the appropriate support mechanisms in place. This obligation is in place to protect staff, students, and the public. Some of the activity is undertaken by UHI under this obligation or under its public task as a university delivering the course leading to registration.</p>

	<p>This process is also necessary, in the public interest, for the purposes of protecting the public against dishonesty, unfitness or incompetence and regulatory requirements relating to malpractice etc.</p> <p>Lawful reason for processing: '9(2)(b) Social protection or employment law' and '9(2)(h) Occupational medicine, for the assessment of the working capacity of the employee'</p> <p>9(2)(g) Substantial public interest – processing required by an enactment – those legal obligations being set out in the Optician's Act 1989 and put into practice by regulations set by the General Optical Council. Including, but not limited to; standards 6, 9, 11, 12 of the GOC Standards of practice for optometrists and dispensing opticians.</p> <p>UHI and your placement provider(s) are required to keep you and patients safe and well during your placement. This is an obligation under the duty of care of the organisations, the GOC Standards for Optical Students, as well as the Health and Safety at Work Act 1974.</p> <p>More information is available on the GOC website at:  <a href="https://optical.org/en/publications/declarations-guidance-for-students/">https://optical.org/en/publications/declarations-guidance-for-students/</a>  <a href="https://optical.org/en/standards/standards-for-optical-students/">https://optical.org/en/standards/standards-for-optical-students/</a>  (to 31<sup>st</sup> December 2024)  <a href="https://optical.org/en/standards/standards-for-optical-students-effective-from-1-january-2025/">https://optical.org/en/standards/standards-for-optical-students-effective-from-1-january-2025/</a> (from 1<sup>st</sup> January 2025)</p>
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**If you were to withhold the personal information we require for these purposes, the consequences would be:**

If you do not provide the personal data that is necessary for the purposes then UHI and/or other relevant parties would not be able to meet its legal or contractual obligations to you or others and the relevant purposes will not be completed by the relevant party(ies).

The inability of parties to undertake the purposes will have a negative impact on your studies and may impede your ability to complete your course of study given the importance of the purposes for your education, your safety and the safety of others.

In some cases, this may affect your ability to practise now or in the future, and may to financial disadvantage or you failing to meet obligations of any relevant funding.

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

The GOC, your placement provider, and UHI all have responsibilities under the Health and Safety at Work Act 1974, RIDDOR Regulations, and GOC regulations / Optician's Act 1989.

These obligations set out a range of requirements for all parties to keep you, and others, safe and to ensure placements are carried out with due academic and practice standards. Any personal data that is necessary for any of these purpose will, or may, be process and/or shared with any other relevant body.

<b>Purpose:</b>	<b>Data will, or may, be shared with.</b>
<b>Purpose 1: Occupational Health Service for Optometry Students</b>	NHS Highland Occupational Health Service
<b>Purpose 2: Optometry placements administration</b>	Placement providers / Associated NHS Boards / Private Sector / NHS Education for Scotland
<b>Purpose 3: General Optical Council Registration</b>	<p><b>GOC</b> More information about their use of personal data is available here:</p> <p><a href="https://optical.org/en/about-us/accessing-information/our-policies/privacy-statement/">https://optical.org/en/about-us/accessing-information/our-policies/privacy-statement/</a></p> <p><a href="https://optical.org/en/about-us/accessing-information/our-policies/data-protection/">https://optical.org/en/about-us/accessing-information/our-policies/data-protection/</a></p> <p><b>NHS Education for Scotland</b> More information about their use of personal data is available here:</p> <p><a href="https://www.nes.scot.nhs.uk/privacy-and-data-protection.aspx">https://www.nes.scot.nhs.uk/privacy-and-data-protection.aspx</a></p>
<b>Purpose 4: Funding administration</b>	<p><b>SAAS</b> – More information about their use of personal data is available here: <a href="https://www.saas.gov.uk/privacy/privacy-statement">https://www.saas.gov.uk/privacy/privacy-statement</a></p> <p><b>Any Person or body funding your study:</b> to the extent appropriate, personal data may be shared with funding providers</p>
<b>Purpose 5: Progress reports to funding bodies</b>	<p><b>SAAS funded students:</b></p> <p><a href="https://www.saas.gov.uk/privacy/privacy-statement">https://www.saas.gov.uk/privacy/privacy-statement</a></p>
<b>Purpose 6: Provision of uniform</b>	<p><b>Dimensions – uniform provider:</b> Privacy notice - <a href="https://www.dimensions.co.uk/cdn/uploads/Mi_Hub_Privacy_Policy_V1.4.pdf">https://www.dimensions.co.uk/cdn/uploads/Mi_Hub_Privacy_Policy_V1.4.pdf</a></p> <p><b>Ede and Ravenscroft – provider of gowns for graduation:</b> Privacy notice - <a href="https://www.edeandravenscroft.com/privacy-policy/">https://www.edeandravenscroft.com/privacy-policy/</a></p>
<b>Purpose 7: Health</b>	More information about the GOC's use of personal data is available here:

	<a href="https://optical.org/en/about-us/accessing-information/our-policies/privacy-statement/">https://optical.org/en/about-us/accessing-information/our-policies/privacy-statement/</a>  <a href="https://optical.org/en/about-us/accessing-information/our-policies/data-protection/">https://optical.org/en/about-us/accessing-information/our-policies/data-protection/</a>
<b>Purpose 8: Reporting of completion to relevant regulatory bodies</b>	<p><b>GOC</b> More information about their use of personal data is available here:   <a href="https://optical.org/en/about-us/accessing-information/our-policies/privacy-statement/">https://optical.org/en/about-us/accessing-information/our-policies/privacy-statement/</a>   <a href="https://optical.org/en/about-us/accessing-information/our-policies/data-protection/">https://optical.org/en/about-us/accessing-information/our-policies/data-protection/</a></p> <p><b>NHS Education for Scotland</b> More information about their use of personal data is available here:   <a href="https://www.nes.scot.nhs.uk/privacy-and-data-protection.aspx">https://www.nes.scot.nhs.uk/privacy-and-data-protection.aspx</a></p>

**Your data will be retained by UHI for the following length of time:**

<b>Purpose 1: Occupational Health Service for Optometry Students</b>	Any data received by UHI from your occupational health service will be kept for end of registered student relationship with the University
<b>Purpose 2: Optometry placements administration</b>	This information is retained for Academic year + 5 years, then deleted.
<b>Purpose 3: General Optical Council Registration</b>	End of registered student relationship with the University
<b>Purpose 4: Funding administration</b>	<p>The up-to-date information about this is included in the HE enrolment privacy notice that can be accessed in the 'privacy information and notices' tab on this page:  <a href="https://www.uhi.ac.uk/en/students/support/support-with-your-studies/student-records/why-we-collect-data-about-you/">https://www.uhi.ac.uk/en/students/support/support-with-your-studies/student-records/why-we-collect-data-about-you/</a></p>
<b>Purpose 5: Progress reports to funding bodies</b>	End of registered student relationship with the University
<b>Purpose 6: Provision of uniform</b>	Completion of provision of uniform
<b>Purpose 7: Health</b>	End of registered student relationship with the University
<b>Purpose 8: Reporting of completion to relevant regulatory bodies</b>	Information retrieved from student record as required. Student record held by University Archive permanently

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.