

Use of the UHI Online Disclosure Tool – further information

This notice relates to the following process:

This notice is provided in addition to the privacy notice for the UHI online disclosure tool. This notice provides more detail for those who want to know more about how the process operates.

How your data is managed when you use the UHI Online Disclosure tool.

The webform allows you to make anonymous disclosures and to use an alternative to email or face-to-face disclosure. The disclosure will be received by a relevant member of student services staff in your local Academic Partner who will record and/or take action on your disclosure, depending on the level of detail you provide. If you do not provide your name, then staff will not be able to contact you to offer support.

You can read more about the disclosure handling process here: [Online Disclosure Tool landing page](#)

Your information will be used for the following purposes:

This section provides more detail about how disclosures are managed and handled:

<p>Purpose 1: Assigning the disclosure to the relevant AP Student Services team so contact can be made to provide support.</p>	<p>A member of the Student Services team in your Academic Partner will use the details you provide (if any) to contact you to offer an initial appointment where you will be able to discuss your disclosure in private and access support.</p> <p>Once a case has been opened, in the relevant Academic Partner area, your personal data in the Online Disclosure tool will be deleted.</p>
<p>Purpose 2A: Management of disclosure case file by Academic Partner Student Services.</p> <p>Including, supporting you, safeguarding you and others, and taking forward any disciplinary processes or investigations</p>	<p>The Academic Partner Student Services team will use the data you have provided to support you, and to safeguard you and others.</p> <p>Support you: Provide targeted support for you as an individual.</p> <p>Safeguard you and others: Your academic partner has legal obligations in the area of safeguarding and will take steps to assess risk to you and others and to take appropriate action, to the extent necessary, to protect others. Please note, this may include taking action relating to you and/or other individuals; including but not limited to; the alleged perpetrator. Please be aware that such action may be taken.</p> <p>Disciplinary processes: If your disclosure relates to a matter that may be in breach of the UHI (or Academic Partner's) Student Code of Conduct (or any other student regulations), then UHI/ your academic partner may take forward the relevant disciplinary process(es).</p>

	The exact action will depend on a number of factors, including: what you disclose, the risks to you and others, the age and/or vulnerability of you or others, and whether a disciplinary process commences. You can discuss this process with the student support member of staff who contacts you.
<p>Purpose 2B: Handling high risk events / circumstances or risks to individuals or communities while providing you with support and safeguarding you and others</p>	<p>Your academic partner has legal obligations in the area of safeguarding. The Academic Partner Student Services Team will provide you with support, if you disclose information which indicates a safeguarding risk to you or others, then appropriate steps, as required by law, will be taken to react to the risks.</p> <p>This may include disclosing your information (and/or information relating to others – provided by you or otherwise know to your academic partner) to relevant bodies who include, but are not limited to:</p> <ul style="list-style-type: none"> • Police and/or Procurator Fiscal staff • GPs and other health professionals • Community Mental Health Teams and associated agencies • Mental Health Support Workers • Social Services and other relevant local authority (and other) services • Other emergency services • Any other party that should be informed in order for the Academic Partner to exercise its safeguarding functions
<p>Purpose 3: Inform strategic and operational UHI work in relation to GBV</p>	Anonymised details of disclosures may be reviewed and analysed by UHI or UHI Academic Partners to recognise trends and patterns in GBV disclosures. This helps to ensure both strategic and operational planning of GBV prevention, response, and intervention is as effective as possible.

Our lawful bases for using the personal data are:

Legal obligation and public task:

The processing is necessary for the Academic Partner(s)/UHI to meet their legal obligations and expectations. Those being to safeguard its students, staff and stakeholders as required by Health and Safety at Work Act 1974, Protection of Vulnerable Groups (Scotland) Act 2007, Protection of Children (Scotland) Act 2003, the Adult Support and Protection (Scotland) Act 2007, the Children and Young People (Scotland) Act 2014, Equality Act 2010, Further and Higher Education (Scotland) Act 2005, Domestic Abuse (Scotland) Act, Forced Marriage etc. (Protection and Jurisdiction) (Scotland) Act 2011, Human Trafficking & Exploitation (Scotland) Act 2015, Sexual Offences (Scotland) Act 2009, the Academic Partners' General Duty of Care, and any other relevant legal obligations. These requirements may include the direct obligations in these laws, or actions recommend of the Academic Partners' by those laws, and associated guidance. Such guidance including the Scottish Government's Equally Safe Strategy.

Vital interests:

In high risk or emergency situations we may share or process your data for the purposes of protecting the 'vital interests' of you or another person. Protecting 'vital interests' means protecting individuals from death or significant harm.

The data being used includes special category (sensitive) data, Our legal reasons for using this sensitive data, where provided, are:

The processing is required for the purposes of **Employment, social security and social protection law** or to **Protect the vital interests of a person**. On some occasions we may share or process your personal data based on your **explicit consent**.

Substantial public interest: The processing is necessary for reasons of substantial public interest, those being: Safeguarding of children and individuals at risk, Protecting the public against dishonesty etc, Preventing or detecting lawful acts, Regulatory requirements relating to unlawful acts and dishonesty etc, Statutory purposes – the processing is required to meet a legal obligation in the public interest, such obligations including those set out in the lawful bases section above.

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

<p>Purpose 1: Assigning the disclosure to the relevant AP Student Services team so contact can be made to provide support.</p>	<p>The data you input will be received and viewed by the Student Services department in your Academic Partner. Your data may be shared by this team to Student Services staff in other UHI Academic Partners, or with relevant Safeguarding professionals elsewhere in the UHI Partnership who are well placed to assist with providing the best support to you.</p> <p>UHI and its Academic Partners operate on a partnership model and sometimes deliver their services through other Academic Partners or the University. This means that the Student Services function may be delivered by a different UHI Academic Partner. For this reason, your data may be shared with one or more of the UHI Academic Partners' Safeguarding/student support teams. A list of academic partner colleges and their support contacts can be found here.</p>
<p>Purpose 2A: Management of disclosure case file by Academic Partner Student Services.</p>	<p>Once you have been contacted in response to your disclosure, the process will be handled in line with UHI's Student Gender Based Violence policy and any other UHI policies, procedures and guidance that apply.</p> <p>These processes sometimes require personal data to be shared with other individuals or organisations. This may include but is not limited to:</p> <ul style="list-style-type: none"> • Police and/or Procurator Fiscal staff • GPs and other health professionals • Community Mental Health Teams and associated agencies • Mental Health Support Workers • Social Services and other relevant local authority (and other) services • Other emergency services <p>Any other party that should be informed in order for the Academic Partner to exercise its safeguarding functions.</p> <p>You should discuss this with the student support staff member assisting you to understand how personal data will be used and</p>

	shared. The exact processes and policies that will apply, and how your data will be used, will depend on a number of factors including: what you disclose, the risks to you and others, your age or vulnerability, whether a disciplinary process commences.
Purpose 2B: Handling high risk events / circumstances or risks to individuals or communities while providing you with support and safeguarding you and others	<p>When we provide you with support, if you disclose information or we interpret information that indicates a significant and/or immediate risk to you or others we may take appropriate steps, as required by law, to safeguard you and others.</p> <p>This may include disclosing information, that may include your personal data, to parties relevant to reducing that risk or resolving that emergency. Such parties may include (but are not limited to);</p> <ul style="list-style-type: none"> • Police and/or Procurator Fiscal staff • GPs and other health professionals • Community Mental Health Teams and associated agencies • Mental Health Support Workers • Social Services and other relevant local authority (and other) services • Other emergency services <p>Any other party that should be informed in order for the Academic Partner to exercise its safeguarding functions</p>
Purpose 3: Inform strategic and operational UHI work in relation to GBV	UHI will not share your personal data for this purpose, but will report anonymised statistics (that will not allow any individuals to be identified) internally and externally.

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

Purpose 1: Assigning the disclosure to the relevant AP Student Services team so contact can be made to provide support.	<p>Your personal data will be erased in the Online Disclosure Tool once the case has been opened by the Academic Partner. Your data will then be held by your Academic Partner.</p> <p>Your academic partner will then hold your disclosure record, and further records created in supporting you, for the following period:</p> <p>Disclosure record = Date of creation + 1 year.</p> <p>Records created to support you = End of Student Relationship +3 or End of student relationship +7 years (if you are an estranged, care experienced student, or student carer).</p>
Purpose 2A: Providing you with support and safeguarding you and others	This will be in line with local Academic Partner data retention policies. Please speak to your local Academic Partner Student Services team for further information. Your data will then be held by your Academic Partner.

<p>Purpose 2B: Handling high risk events / circumstances or risks to individuals or communities while providing you with support and safeguarding you and others</p>	<p>If any additional data is created or processed for this purpose (when interacting with external persons for the safeguarding purpose) then it will be deleted as soon as possible after the emergency ends unless the data must be held for longer to comply with a legal obligation.</p> <p>Your academic partner will then hold your disclosure record, and further records created in supporting you, for the following period:</p> <p>Disclosure record = Date of creation + 1 year.</p> <p>Records created to support you = End of Student Relationship +3 or End of student relationship +7 years (if you are an estranged, care experienced student, or student carer).</p>
<p>Purpose 3: Inform strategic and operational UHI work in relation to GBV</p>	<p>Anonymised data may be held for an indefinite period. Anonymised data does not include your personal data or any information that could be used to identify you.</p>

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.