



Highlands and Islands Students' Association Data Protection Policy

Executive Summary

The Highlands and Islands Students' Association (HISA) Data Protection Policy underscores a commitment to handling all data of employees, members, stakeholders, and interested parties with utmost care and confidentiality. The policy ensures compliance with relevant laws and guidelines while respecting individual rights.

- **Scope:** The policy extends to all parties providing data to HISA, including members, staff, officers, academic partners, and other stakeholders.
- **Data Handling:** Data is acquired primarily through agreements with the University of the Highlands and Islands (UHI) and via online platforms such as Microsoft Forms and Membership Services Limited. Personal data includes information like names, contact details, academic details, and employment information, which are stored securely on platforms like UHI SharePoint and MSL systems.
- **Data Usage:** Data is utilised to facilitate organisational objectives, such as communication with members, personalisation of messages, and resource allocation based on study locations and enrolment status.
- **Policy Elements:** The policy outlines principles for data accuracy, lawful processing, protection against unauthorised access, and restricted data transfer. Additionally, it delineates obligations towards data subjects, including transparency, access, and provisions for data loss or compromise.
- **Data Protection Measures:** HISA commits to restricting access to sensitive data, training employees in privacy measures, establishing secure networks, and implementing clear breach reporting procedures. These provisions will be publicly accessible on the organisation's website.
- **Disciplinary Consequences:** Violations of data protection guidelines will lead to disciplinary action, with significant breaches prompting collaboration with UHI and self-referral to the Information Commissioner's Office (ICO).
- **Data Breach Protocol:** In case of suspected data breaches, individuals are encouraged to contact HISA, with significant breaches triggering collaboration with UHI and ICO.
- **Data Removal and Subject Access Requests:** Individuals have the right to request data removal or access via Subject Access Requests (SAR), which HISA commits to processing within one month of submission.
- **Further Reading:** The policy references relevant legislation and guidance for additional information on data protection laws and resources.
- **Contact Information:** Individuals can contact HISA via email or phone for inquiries or data-related concerns.

This executive summary encapsulates the critical components of the HISA Data Protection Policy, ensuring transparency, accountability, and protection of data rights for all stakeholders [involved](#).

Policy Brief and Purpose

The Highlands and Islands Students' Association (HISA) Data Protection Policy refers to our commitment to treat the information of employees, members, stakeholders and other interested parties with the utmost care and confidentiality.

With this policy, we ensure that we gather, store, and handle data fairly and transparently, with due regard to the law, current official data guidance, and respect for individual rights.



If you believe there has been a data breach, then please find out more at the bottom of this policy.

Scope

This policy refers to all parties who provide any amount of data or information to us, including:

- Members of HISA (Students enrolled at the University of the Highlands and Islands and its partners) are outlined in our articles of association.
- Staff and elected officers who HISA employs.
- The University of the Highlands and Islands or its Academic Partners.
- Any other key stakeholders who require us to gather, store or handle their data.

Who is covered under the Data Protection Policy?

Employees of our company and its subsidiaries must follow this policy.

Contractors, consultants, partners, and other external entities are also covered. Generally, our policy refers to anyone we collaborate with or act on our behalf and may need occasional access to data.

How do we gather data?

We gather data in largely two ways at HISA.

1. We have a **data-sharing agreement** with the University of the Highlands and Islands (UHI), which provides us with data on current students enrolled at the University.
 - a. This data is then uploaded to our Customer Relations Management Software (Membership Services Limited).
2. We gather data through Microsoft Forms or our Customer Relations Management Software (Membership Services Limited), who operate our website, elections & referenda platform.

What personal data do we handle?

The personal data we handle belongs to our HISA Members and our staff and officers. We collect and handle the following for our students.

- Name
- Date of Birth
- Email Address
- Study Type (Undergraduate/ Postgraduate)
- Programme Level (Year of Study)
- Programme ID (Course Name)
- Academic Faculty/ School/ Subject Network/ Department
- Academic Learning Centre/ Campus Location
- Study Start Date
- Study End Date
- Finalist (Is this their final year?)
- Consent marker for Union Communication.

And we collect and handle the following for our staff and officers, using our Breath HR System.

- Name
- Date of Birth
- Email Address
- Right To Work Proof



- Next of Kin Contact Information
- National Insurance Number

How do we store data?

Data is stored in several ways, illustrated below.

- The data is stored on the UHI SharePoint (Microsoft) file system.
 - These files are encrypted and only accessible to identifiable employees and employee groupings at HISA.
- The data is stored on the Membership Services Limited (MSL) system.

Both providers undergo rigorous testing and data compliance to ensure that data is well protected.

How do we use data?

We use data to further our objective as a charity and membership organisation. Here are a number of examples of how we might use data.

1. **UHI Email Address** – We will email our members with information about upcoming events, meetings or democratic functions in order to inform our membership.
2. **Academic Partner** – We will use the academic partner of students to personalise messages to students.
3. **Course Names** – We will use course data of students to improve and operate our Student Voice Rep system.
4. **Study Locations** – We will use data on how many students study at a particular UHI campus or learning centre to make decisions about resources and activities.
5. **Study Start and End Date** – We use this to delete data of persons who are no longer enrolled at UHI, and therefore are no longer members of the Students' Association.

Accuracy Of Data

Students

You can check the accuracy of your data by logging into our website with your student number here and clicking "Register New Account" (<https://hisa.uhi.ac.uk/login/>) and checking the following page (<https://hisa.uhi.ac.uk/contactdetails/>)

Staff and Officers

When Staff and Officers are enrolled, they are inducted and start using our BreathHR system that allows them to update their personal information that we handle.

Policy Elements

As part of our operations, we need to obtain and process information. This information includes any offline or online data that makes a person identifiable, including names, addresses, usernames and passwords, digital footprints, and photographs.

Our company collects this information in a transparent way and only with the full cooperation and knowledge of interested parties. Once this information is available to us, the following rules apply.

Our data will be:

- Accurate and kept up to date.
- Collected fairly and for lawful purposes only.



- Processed by the company within its legal and moral boundaries.
- Protected against any unauthorised or illegal access by internal or external parties.

Our data will not be:

- Communicated informally.
- Stored for more than a specified amount of time.
 - i.e We will not keep the data of an identifiable student for longer than their HISA Membership or one month after graduation (whichever is earliest).
- Transferred to organisations, states or countries that do not have adequate data protection policies.
- Distributed to any party other than the ones agreed upon by the data owner (exempting legitimate requests from law enforcement authorities).

In addition to ways of handling the data the company has direct obligations towards people to whom the data belongs. Specifically, we must:

- Let people know which of their data is collected.
- Inform people about how we will process their data.
- Inform people about who has access to their information.
- Have provisions in cases of lost, corrupted, or compromised data.
- Allow people to request that we modify, erase, reduce or correct data contained in our databases.

To exercise data protection, we are committed to:

- Restrict and monitor access to sensitive data.
- Develop transparent data collection procedures.
- Train employees in online privacy and security measures.
- Build secure networks to protect online data from cyberattacks.
- Establish clear procedures for reporting privacy breaches or data misuse.
- Include contract clauses or communicate statements on how we handle data.
- Establish data protection practices (document shredding, secure locks, data encryption, frequent backups, access authorisation etc.)

Our data protection provisions will appear on our website.

Disciplinary Consequences

All principles described in this policy must be strictly followed. A breach of data protection guidelines will invoke disciplinary and possibly legal action.

If there has been a significant breach, we will work with UHI and self-refer ourselves to the Information Commissioners Office (ICO).

Data Breach

In the first instance, if you believe there has been a data breach (or something has gone wrong) where information is available to unauthorised persons, you can get in touch with us at hisa@uhi.ac.uk or phone us on **01463 279 391**.

If the data breach is significant, then we will work together with UHI to self-refer ourselves to the Information Commissioners Office (ICO).

How To Remove Your Data



If you are a student at the University of the Highlands and Islands or any of its academic partners, and you consented to your data being shared with our organisation, then you have the right to be deleted from our systems and process. You can do this by contacting the Student Records Office (SRO) by following the link here (<https://www.uhi.ac.uk/en/contact-us/contact-sro/>).

Subject Access Request

You have the right to ask our organisation if we are using or storing your personal information and this can be done through Subject Access Request (SAR). Anyone can request their data from our organisation, and we will get back to your request within one month of you submitting.

You can email us at hisa@uhi.ac.uk and include the following.

- a subject line or header that says "subject access request";
- the date you're making the request;
- your name (and any other names where relevant, eg your name before you were married);
- your email address, home address and phone number;
- customer account numbers, NHS number, employee number, product number or similar information that can help identify you;
- what personal information you want (be specific about the information you're asking for, and where relevant say what information you don't need);
- details or dates that will help the organisation find the information you want;
- the reason you want the information (you don't have to include this but it will help the organisation find what you need); and
- how you would like to receive the information (eg electronically or printed and sent by post) and if you have any accessibility requirements (eg large fonts).

Further Reading

1. The Data Protection Act 2018 (UK) [<https://www.gov.uk/data-protection>]
2. UK GDPR Guidance and Resources (Information Commissioners Office) [<https://ico.org.uk/for-organisations/uk-gdpr-guidance-and-resources/>]