

Contact details:

The Data Controller of the information being collected is UHI North, West and Hebrides, Ormlie Road, Thurso, Caithness, KW14 7EE. For any queries or concerns about how your personal data is being processed you can contact the Data Protection Officer at dpo.nwh@uhi.ac.uk

This privacy statement relates to the following processing:

UHI North, West and Hebrides (UHI NWH) collects and processes personal data relating to its contractors and to manage all aspects of our relationship with you. We are committed to being transparent about how we collect and use that data and to meeting our data protection obligations.

How we use your information:

<p>Purpose 1: Health and safety</p>	<ul style="list-style-type: none"> • Keep a log of contractors on our premises for security and health and safety purposes • To locate you in emergency situations • Accident reporting: If you suffer an injury or become unwell whilst onsite, we will document details in line with regulatory requirements • The University may contact you with important information relating to our campuses or services ie. campus closure, public health incident or other emergency
<p>Purpose 2: Security</p>	<ul style="list-style-type: none"> • Verify your identity • Issue you with a pass permitting appropriate levels of access to our premises (includes swipe card data) • Provide you with access to our facilities • For the prevention and detection of crime (CCTV footage)
<p>Purpose 3: Contract management</p>	<ul style="list-style-type: none"> • To administrate the contract and our relationship with you • Facilitate communication between you and other UHI NWH staff or contractors • Document your suitability to fulfil the contract (eg. pre-employment checks, including PVG where necessary) • Evidence contractor due diligence (professional qualifications/memberships/ references etc.) • To pay you for services delivered – please see our Trade Creditors Privacy Notice for further details

Purpose 4: Training and Development	<ul style="list-style-type: none"> • Induction and training records • Performance monitoring and management • Contractor development records
Purpose 5: Equalities	<ul style="list-style-type: none"> • To take steps to encourage equality of treatment (reasonable adjustments)
Purpose 6: internal reporting and external requests for information; internal and external audit	<ul style="list-style-type: none"> • To support internal management decision making • Responding to requests under legal obligations such as FOI • Use of Data for Auditing Purposes
Purpose 7: Vital interests	<ul style="list-style-type: none"> • Your personal data may be shared with emergency services if you are injured or unwell to protect either your vital interests or those of another living person, in circumstances where you are unable to consent to care for physical or mental reasons. • In such situations, the University may use your listed emergency contact in the interests of protecting your wellbeing

Our legal reasons for using the data are:

To achieve the following purposes: Purpose 1: Health and safety Purpose 2: Security Purpose 3: Contract management Purpose 5: Training and Development Purpose 6: Equalities 7: internal reporting and external requests for information; audit purposes

We may process your personal data because it is necessary for the **performance of a contract** with you.

We use special category data that you may choose to share with us to achieve this purpose

- **Criminal conviction data** collected for PVG checks. Use is necessary in the public interest for compliance with: employment law and social protection law, statutory purposes, and safeguarding of children and of individuals at risk.
- **Equalities data:** to allow us to make reasonable adjustments you may require whilst on our premises. Use is necessary in the public interest for compliance with equality of opportunity or treatment.
- **Health data:** is recorded if you have a medical condition or are involved in a H&S incident or accident. Use is necessary for ‘employment law’. The data will also be used to protect your vital interests if you are unable to consent to emergency medical care.

To achieve the following purposes: Purpose 1: Health and safety Purpose 3: Contract management Purpose 5: Training and Development Purpose 6: Equalities Purpose 7: internal reporting and external requests for information; audit purposes

Our lawful basis for processing is to comply with a **legal obligation** to respond and satisfy requests received under the following legislation:

- Health and Safety at Work Act 1974, and other associated regulations such as RIDDOR
- Employment Act, and other employment law
- Employer’s Liability Act 1969
- Equalities Act 2010
- Protection of Vulnerable Groups (Scotland) Act 2007 and UHI NWH’s Duty of Care
- National Fraud Initiative under the Public Finance and Accountability (Scotland) Act 2000
- Freedom of Information (Scotland) Act 2002

We use special category data to achieve the above purposes

- **Criminal conviction data** collected for PVG checks. Use is necessary in the public interest for compliance with: employment law and social protection law, statutory purposes, and safeguarding of children and of individuals at risk.
- **Equalities data:** to allow us to make reasonable adjustments you may require whilst on our premises. Use is necessary in the public interest for compliance with equality of opportunity or treatment.
- **Health data:** is recorded if you have a medical condition or are involved in a H&S incident or accident. Use is necessary for ‘employment law’ purposes.

To achieve the following purposes: Purpose 1: Health and safety Purpose 3: Contract Management Purpose 7: internal reporting and external requests for information; audit purposes

Our lawful basis for processing is to perform a **public task**

We use special category data to achieve the above purposes

- UHI NWH has a duty to ensure the safety of its premises, assets, and all onsite individuals. Processing of special category data captured by CCTV is necessary for reasons of ‘substantial public interest’ and is authorised by domestic law proportionate to the aim pursued: ‘preventing or detecting unlawful acts’ (when sharing footage with relevant authorities).
- To fulfil safeguarding and duty of care requirements to vulnerable groups, criminal conviction data will be collected from PVG checks. Use is necessary in the public interest for compliance with safeguarding of children and of individuals at risk.

To achieve the **Purpose 8: Vital interests**
following purposes:

Our lawful basis for processing is to protect your **vital interests**

We use **special category data** to achieve the above purposes

- In the event of an emergency, if you are physically or mentally unable to consent to care, or where there is risk to the life of another living person, we will rely on ‘vital interests’ as our lawful basis for processing your special category data.

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

- HMRC
- Disclosure Scotland
- University of the Highlands and Islands
- [Audit Scotland’s National Fraud Initiative](#)
- Other contractors or suppliers engaged by UHI NWH to work with you
- During the audit process personal data may become viewable to auditors
- IT service providers (e.g., MS 365)
- Auditors
- Law enforcement bodies (where we are legally obligated to share information)
- Insurers and legal representatives (in the event of a claim involving you)

Retention:

Your data will be retained in accordance with the [UHI NWH Records Retention and Disposal Policy](#), which follows the UHI Retention and Disposal Policy.

Your data subject rights:

You have the following rights in relation to your personal information:

- The right to access your personal information.
- The right to rectification if the personal information 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 (where consent is our lawful basis).
- The right to object to our processing of your personal information.
- The right to request erasure (deletion) of your personal information.
- The right to data portability.

Complaints

You have the right to [complain to the Information Commissioner’s Office](#) if you are unhappy with our treatment of your personal data. You are also welcome to write to our [Data Protection Officer](#) with details of your complaint, who will endeavour to provide you with a timely resolution.