

Privacy Notice – UHI Transformation Operating Model project – Full Business Case

The Joint Data Controllers of the information being collected are:

- The University of the Highlands and Islands (UHI)
- Highland Theological College (HTC)
- Sabhal Mòr Ostaig (SMO)
- Scottish Association for Marine Science (SAMS)
- UHI Argyll
- UHI Inverness
- UHI Moray
- UHI North, West and Hebrides
- UHI Orkney
- UHI Perth
- UHI Shetland

These parties will be joint controllers and will be processing the personal data by way of sharing and analysing the data individually and within a joint groups, such as the UHI Transformation Team, Transition Executive Board / Transition Oversight Board.

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

This privacy statement relates to the following process:

In 2023, the UHI partnership began a programme of transformational change under the banner 'UHI 2024' to identify and address barriers to improving our joint operating effectiveness. UHI's mission and vision were defined, and with support across the partnership, the Strategic Plan 2030 was developed where it was agreed by all partners to 'think, plan and act' as one during the lifetime of this strategy.

UHI 2024 was the bedrock of change to bring our partnership together. This work has now evolved and as part of this evolution, an Outline Business Case has been drafted which is the formal beginning of UHI's transformational journey to develop a new operating model. Once the Outline Business Case is finalised, work will commence on developing a Full Business Case, which will be presented to UHI Governing bodies in June 25. There will then be a full formal consultation with students, staff and all of our stakeholders before submission to the Scottish Government. This consultation is planned to start by the beginning of next Academic Year.

The work to oversee the development of the Outline and Full Business Cases is being undertaken by a Transition Oversight Board (TOB) and a Transition Executive Board (TEB) which include representation from UHI Academic Partners, The University, HISA and the SFC. The terms of reference and membership of these groups can also be found on the SharePoint site [UHI Transformation](#). The work itself is being coordinated and delivered by the UHI Transformation team, supported through SFC funding.

To prepare the Full Business Case, the Transformation Team need to conduct detailed analysis, options development and appraisal, and modelling to present to both the transition oversight board

and the transition executive board with an evidence base to underpin UHI's decisions about the new operating model.

To complete this work the two Boards and the Transformation Team require access to information about the university and Academic Partners – including, but not limited to, information about financial positions, curriculum, staffing, and estates. This information will include personal data of University and Academic Partner staff. The information will be used to conduct analyses, options development and appraisal, and modelling in, at least, the following areas: governance, finances, people and culture and communities.

More information about the UHI Transformation / Operating Model project is available here: [UHI Transformation](#)

The next section sets out the elements of the transformation agenda and the purposes for which personal data will be processed in pursuance of the agenda. All of the purposes need to be considered together and all of the elements may be considered individually, with other elements, or all together. Likewise, personal data collected for any of the purposes will be used for that purpose individually, or as part of joint analysis with other elements, or all elements together. Any personal data collected for the transformation agenda may be used for any of the purposes listed below, either individually or jointly.

Your information will be used for the following purposes:

Broad purpose	<p>The broad purpose of the processing of personal data is to conduct the work for the preparation of the UHI Transformation / Operating Model Full Business Case and consultation – as explained in the previous section.</p> <p>This processing will include, at least: conducting analyses, options development and appraisal, and modelling, and/or consultation in at least, the areas listed in purposes 1-8 below.</p>
Purpose 1: Governance analysis and options appraisal	<p>This purpose is concerned with the current governance arrangements in the institutions and considers what governance options are available for the future operating model. This will form part of the business case.</p>
Purpose 2: Curriculum review	<p>This purpose is concerned with current curriculum provision in the institutions and considers what curriculum options are available for the future operating model, with a view to setting out options and making recommendations in the final business case.</p>
Purpose 3: Estates review	<p>This purpose is concerned with the institutions' estates and considering what the estate options available for the future operating model, with a view to setting out options and making recommendations in the final business case.</p>

Purpose 4: Workforce review and resilience	This purpose is concerned with staffing across the institutions and considering what the staffing options and arrangements available for the proposed future operating model options, with a view to setting out options and making recommendations in the final business case.
Purpose 5: Financial modelling	This purpose considers the current financial positions and plans of the institutions. Considering the financial models and arrangements available for the future operating model, with a view to setting out options and making recommendations in the final business case.
Purpose 6: Due diligence (financial and legal)	<p>This purpose is concerned with the due diligence work that the institutions and, to the extent relevant, the two boards and the Transformation Team need to undertake to ensure any risks relating to the final business case development or delivery are recorded and analysed (and, where necessary, accounted for and mitigated). The purpose also extends to ensuring analyses are carried out in keeping with legal and regulatory standards.</p> <p>This may include consulting (and where necessary data sharing) with important stakeholders – for example the academic partner Principals and the Scottish Funding Council.</p>
Purpose 7: Consultation	This purpose is concerned with the internal and external consultation processes the institutions (alone or jointly) will undertake to ensure the views of our stakeholders are considered in the development of the operating model and business case.
Purpose 8: Pensions	This purpose is concerned with the due diligence work that the institutions must undertake to ensure any risks arising from the proposed operating model project related to pension liabilities are recorded and analysed (and, where necessary, accounted for and mitigated).

The data originates from these sources and following personal data being used for this process has originated from a third party:

The institutions have jointly decided to embark on a transformation / operating model project – more detail available here: [UHI Transformation](#).

The project requires that the institutions undertake detailed analyses, options development and appraisal, and modelling, and/or consultation. For the analyses to be of sufficient quality and detail to accurately inform the project the information required must include personal data of institution staff.

The Transformation Team intends to conduct its analyses in stages. This privacy notice lists the personal data they will be collecting from your employer for the first phase of the operating

model / business case project. If the operating model / business case project requires more, or more detailed, personal data in future phases you will be informed by way of an updated version of this privacy notice.

To be provided in general:

- Organisational Structures
- Salary scales/grading structure
- Average age and average length of service per institution
- Salary multiplier for on-cost if it has changed in the past 1.5 years
- Numbers of staff in each role

To be provided per-person basis:

- FTE
- Salary Grade
- Job titles / Department / Job Category

It is anticipated that future phases of the operating model / business case project may require further personal data relating to staff.

The operating model / business case project is a joint-controller exercise between the institutions. This means that the institutions all jointly decide how this project will function.

Your data will be supplied by your employer to the TEB / TOB / Transformation Team for the purposes described in this privacy notice. The TEB / TOB will, or may, commission assistance with its work – meaning that some, or all, of the personal data may be made available to other organisations (under contract) for the purposes set out in this privacy notice. For example, the TEB / TOB may commission assistance from consultants to complete some of the complex analysis work.

Anonymised, pseudonymised and aggregated data will be used instead of personal data as much as possible to reduce the need for personal data to be shared and processed.

Our legal reason for using the data is/are:

To the extent they apply to each of the institutions:

- Legal obligation – Per institutions' obligation to deliver and enhance their research and education provision (in as cost-effective manner as is possible) per the Further and Higher Education (Scotland) Act 2005, including, but not limited to, the carrying out of the 'general duties' and 'efficiency studies' and 'consultations' functions in that Act.
- Public Task – per institutions' public task to deliver and enhance their research and education provision (in as cost-effective manner as is possible) – public task as set out in the Further and Higher Education (Scotland) Act 2005.
- Legal obligation/public task – the need to account for, justify, and improve the efficiency of public spending.

- Legal obligation/public task/legitimate interest - the need to account for, justify and improve the efficiency of spending, ensuring institutional sustainability and best use of resources for all stakeholders.
- Contract – where the processing is necessary for the performance of rights or obligations of either party under your employment contract – for example, considering whether certain changes or modes of consultation are in keeping with your employment contract.

The data being used includes special category (sensitive) data. Our legal reason for using this sensitive data is/are:

The processing does not involve special category (sensitive) data described by the UK GDPR. However, the processing does involve processing data that you may consider sensitive such as, for example, your pay band.

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

Your data will, or may, be shared with:

- **The TEB / TOB**, including staff of: The APs, the University, and the Scottish Funding Council, University Court, AP Board(s). Plus, UHI student and staff representation.
- **The Transformation Team:** That being a team of university staff tasked with undertaking work in pursuance of the operating model / business case project as directed by the TEB and TOB.
- **Consultants or other parties** carrying out work in pursuance of the purposes where instructed by, and under contact with, the TEB, TOB, university or AP(s). For example, consultants.

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

Personal data processed as part of the project will be retained until, at least, the end of the project. It may be held for longer where there is good reason as set out below:

Project files will be retained for the later of:

- The relevant period in the University Partnership retention schedule;
- end of project;
- end of audit requirements;
- Indefinite retention for archiving purposes (only where considered of archival value by the University Archivist).

(noting that parts of the record may be kept and others retained as each of these retention milestones is met)

The project is expected to last until: end of 2029. The project time may be shorter or, given the complexity, longer.

Changes to this privacy notice:

If any changes are required, then these will be made and a new version of this notice will be made available to you.

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.