

# TRANSFERS OF PERSONAL DATA FROM GOLDSMITHS' COLLEGE TO GOLDSMITHS' STUDENTS' UNION

## A General Framework of obligations and how they are derived

The Students' Union has a "Register of members" in the Articles of Governance, approved by Council. This Register has in practice to be provided by the College, as it is data derived from the Student Enrolment process. Before transferring the Register to the Union, the College will exclude from it the name of any student who has exercised their right (under the 1994 Education Act) to opt out of Students' Union membership.

The personal data apart from the name of the student, which is specified to the Students' Union, will be the particular items to which students have agreed as part of the Enrolment process. The statement for each year is published on the College's Data Protection Policy webpages each September:

<http://www.gold.ac.uk/data-protection/data-collection/declaration-new-students/>

(For 2012 onwards, there is more than one version of the notice, and only notices for students on credit-bearing programmes are relevant, pending a more precise review by the College and the Union of which of the newer, low-engagement student categories should in future involve Students' Union membership by default.)

The personal data in the register is transferred to the Students' Union on the particular understanding that the following two formal obligations are met:

### 1 Abiding by the relevant provisions of the Students' Union Articles of Governance (clause 14), viz:

14. Members' details shall be entered in the Register of Members. ....The contents of the Register shall be confidential to the officers and staff of the Union, except where a particular Member has given written permission for his/her information to be made public, or transmitted to another person or organisation, in which case the Registrar and Secretary and the Data Protection Officer of Goldsmiths' College shall receive a copy of the written permission concerned and the information concerned.

### 2 Processing the personal data only for the purposes stated in the notice to students for the most recent enrolment cohort, as the purposes for which it is being transferred, unless the Students' Union has itself sought the consent of the students involved to an additional purpose.

## B Changing the processing purposes to which student consent is obtained by the College on the Union's behalf during the enrolment process.

Any proposals for change will be considered by the College for inclusion in the next year's Enrolment process if they are notified in writing to the College Data Protection Officer before the end of the Easter vacation, but this may not be possible if they are notified later.

When considering whether to make a proposal, the Union will wish to balance the administrative usefulness of obtaining consents through the Enrolment process against the possibility that a long list of SU processing purposes may be unacceptable to some students, making them more likely to select the opt-out. It may be in the best interests of the Union (as well as its students individually) to continue to seek some additional permissions - eg for marketing of Union services - directly once a student has been one of its members for some weeks.

Rosemary Harrison

Head of Corporate Governance and Information Management

October 2012 (Updated 2014 to remove previous references to the University of London Students' Union (now wound up))