

Data Sharing Agreement – Bangor University and Bangor University Students' Union

1. Introduction

1.1 The following agreement governs the transfer and provision of students personal information by Bangor University (hereinafter referred to as “the University”) to Bangor University Students’ Union (hereinafter referred to as “the Union”) and the purposes for which that information may be used by the Union.

1.2 This agreement has been updated in line with the General Data Protection Regulation (GDPR) and the Data Protection Act 2018. Data sharing between Bangor University and Bangor University Students’ Union will comply with all individual rights guaranteed within all data protection legislation.

2. Use of Student Data by the Union

2.1 The University agrees to transfer Student Data to the Union for the following purposes only (save for any additional emergency reasons agreed with the University’s Head of Legal Services or Contracts Manager):

- To support efficient and effective administration of elections and the engagement of all eligible Students in the democratic functions of the Union and verification of students’ identity and eligibility;
- Administration of its engagement with the student body (including, but not limited to: Sports Clubs, Societies, Student Volunteering, UMCB, Student Representation and Student Voice);
- To gather feedback directly from its members and to produce demographic reports on membership engagement;
- To administer surveys of Bangor Students’ Union members and to recruit members for research related activity (e.g. focus groups)
- To verify students’ identities;
- For administration of student case files;
- To manage Union membership, and membership administration and facilitate the purchase of tickets for events;
- Administration of activities in support of the objectives of the Union;
- To allow reasonable and non-disruptive levels of email communication between the Union and its members; and
- To allow email communication between members of its student groups, on the basis that recipients’ email addresses are not made directly available to student groups

Presidents, or their representatives and all communications are sent 'Bcc' to ensure the privacy of individual members;

- To support the University in its collection of data and information for the Higher Education Achievement Report (HEAR) and the Bangor Employability Award (BEA);
- To direct information back to the University for use by the Bangor University Development and Alumni Relations Office in their work engaging with Bangor Alumni;
- To enable the Bangor University Development and Alumni Relations Office to share relevant alumni data with the Union, where appropriate, to allow the Union to directly contact alumni for the purposes of engagement, events, and alumni-related initiatives
- At the request of the University Secretary or nominee, to support any investigations, or matters pertaining to, student safety, wellbeing, safeguarding or the prevention or detection of crime in order to ensure a secure and safe environment for students, staff and visitors;

2.2 Other Information to be shared

- Personal data may also be shared between the parties where required and necessary in order to ensure that the policies and procedures of both the University and Students' Union are upheld and in order to investigate fully any alleged breach of those policies and procedures and take any necessary further action. In particular due regard will be given to the Regulation for Student Discipline and the rules of behaviour outlined therein.
- Where special category of personal data is involved, in particular in relation to the commission or alleged commission of a criminal offence, consideration will be given as to whether the sharing is necessary in order for the University to promptly assess whether the student meets any fitness to practise standards required by the programme on which they are enrolled or to assess the risk posed by the individual to the wider student/staff body.
- For the purpose of monitoring participation in Union activities and *administration of its engagement with the student body (including, but not limited to: Sports Clubs, Societies, Student Volunteering, UMCB, Student Representation and Student Voice)*, as listed in clause 2.1 of this Agreement, attendance data from the Union and Union student group activities available from the University Check-in WebApp will be shared with the Union.

3. Information Provision

Student information will be provided via a secure electronic transfer. The transfer will ensure that the Union (in concert with the Union's chosen membership system supplier) will hold the most up-to-date information and ensure that the details of any student who opts out of the data sharing agreement are removed in accordance with the agreed process.

Prospective Students – The University will provide the Students' Union with relevant data on prospective students who have accepted offers to study at Bangor University, prior to their formal registration. This data will be used by the Union solely for the purpose of pre-arrival engagement, welcome communications, and preparation of services and activities.

New Students - The University will provide the Students' Union with details of all students, of all programme levels, who are to be commencing studies at the University prior to their arrival.

Current Students – Information on current students may be shared by the Union with the University, and by the University with the Union only in specific circumstances as outlined above. Any decisions to share other information for current students will be made following consultation with the Students' Union Director (for the Students' Union) and the Head of Legal Services or the Contracts Manager (for the University).

Permanent Leavers - At the start of May and of October, the University will provide the Students' Union with registration numbers of students who are expected to graduate, or, have permanently left the University since the previous update.

Data Accuracy - Any changes to the shared student data will be updated in the daily transfer of information between the University and the Union.

The data provided by the University shall be taken as an up to date and current record of student status and eligibility to take part in Students' Union activities (e.g. Elections, Clubs and Societies Memberships)

4. Classes of Information

4.1 The University will provide the Students' Union with the following student data

- Student Number (500 number)
- Username
- Forename
- Surname
- Date of Birth
- Gender
- Nationality
- Language of Choice
- Ethnicity
- Domicile Country
- Fee Status
- Department
- Programme ID
- Programme Level
- Study Type

- Mode of Study
- Start Date
- Predicted Leave Date
- Finalist
- Record Type
- Halls of Residence
- Home Address
- Term Address
- University Email Address
- Alternate Email Address

4.2 To assist the Students' Union in their administration of election and facilitate its running in a fair and democratic manner and to monitor and promote engagement with underrepresented groups. Where explicit consent of the student has been provided, the University will also share the following classes of sensitive / special category and student attribute personal data

- Black, Asian or Minority Ethnic (BAME) Student
- Disabled Student
- European Union Student
- International Student
- LGBT+ Student
- Live at Home Student
- Mature Student
- Student Parent or Carer
- Trans Student
- Wrexham Based Student
- Bangor College China Student

5. Conditions for the processing of student personal information

5.1 With regard to the use of students' personal information, Bangor University and Bangor University Students' Union will ensure:

- Compliance with the Bangor University Data Protection Policy and Guidelines;
- Compliance with the Data Protection Act 2018 (and any subsequent legislation passed) generally, and in particular;
 - Members of Bangor University and Bangor University Students' Union staff and Officers handling student personal information will undertake appropriate data protection training before any member of staff / Officers processes information;
 - Any data processor Bangor University Students' Union uses must have in place security policies and procedures that ensure compliance, with the Data Protection Act 2018.
 - Retention of Information – Bangor University and Bangor University Students' Union shall not retain Personal Data transferred under this Agreement for any longer than is necessary and in keeping with respective privacy policies and retention schedules.

6. Conditions and Limitations on Student Data Use and Communications

6.1 The information provided by the University to the Union, and vice versa, shall not be passed to any third party, without the express consent of the individual(s) concerned, except under the following conditions:

- Where the Union has obtained the specific permission from the Head of Legal Services or Contracts Manager on behalf of the University.
- The information provided by the University to the Union shall not, without the express consent of the individual concerned, be used for the purpose of marketing services provided by organisations or individuals other than the Union or University.

6.2 Communication of Marketing or Promotional Material

Notices communicated by the Students' Union to its members for the purposes of:

- public/University health and safety campaigns
- emergency notices in respect of civil contingencies
- supporting the democratic structures and activities of the Union

are not deemed to be marketing/promotional material and ongoing unsolicited communications to students for this purpose are acceptable without consent. The basis for such communication is because of a legal requirement to protect and promote the health and safety of the student body and for the purpose of its public task to promote democratic engagement derived from Section 22 of the Education Act.

For promotional communications about the Union's services, activities, or member benefits, the Union may contact students using their personal or University email addresses, provided they have not opted out. These communications must include a clear unsubscribe option, and any opt-out requests must be respected. Most communications will be delivered via the Union all-student emails and must comply with Bangor University's Information Services IT Regulations.

6.3 Content and Source of Communications

The Union shall ensure that:

- Information sent to students relates directly to the operational activities of the Union or to products and services provided by the Union, which are of genuine benefit to students.
- Information shall not be sent to students to market the products or services provided by organisations or individuals other than the Union. This shall not preclude the Union from including advertising or sponsorship material from third parties with mailings principally sent for the purpose of promoting Union services.
- Students are given an option in each mailing to opt out of future mailings.

6.4 Bangor University Students' Union shall, for the purposes of use within the Higher Education Achievement Report (HEAR), the Bangor Employability Award (BEA), and University wide analytics projects, provide relevant data to the University for the following areas:

- Club / Society, Volunteering Group or UMCB active memberships
- Club or Society Committee Members
- Volunteering Project Leaders and Committee Members
- Course Representatives and Elected Student Leaders
- Democratic engagement (including Elections and Referenda and General Meeting attendance)
- Training and extracurricular learning undertaken, related to the above activity

6.5 Bangor University Students' Union shall, for the purposes of use by the Bangor University Development and Alumni Relations Office provide details of all students involved with Student Opportunities Groups (save for those who have requested to have their information kept confidential).

7. Students opt out rights

7.1 In addition to the opportunity for students to exercise opt out rights as detailed above the following opt out procedures shall be in place:

- Any students who object to their data being shared with the Students' Union in accordance with this Data Sharing Agreement can inform the University of this through the My Bangor portal. Upon notice of this the student's data shall be removed from the live data feed (Students should be aware that this may restrict their access to the Union services and activities).
- Where a student has opted out after an initial transfer of data in which they included the Students' Union (and the Union's chosen membership system supplier), the Union shall ensure that any data provided by the University and relating to those students are securely destroyed without delay. The student will also have the opportunity to opt out of membership of the Union by following the Union's [Bye-Law 8 – Opting Out of Membership](#)

8. Review and publication

8.1 This agreement is to be reviewed annually, and changes shall be agreed between the Students' Union Director and the University Secretary or Head of Legal Services and will go to the University Compliance Committee and Union Board of Trustees for information.

This agreement shall be published on the Bangor University Students' Union and Bangor University websites

This agreement is signed on behalf of Bangor University Students' Union, by:





On this date:

This agreement is signed on behalf of Bangor University, by:

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On this date: