



Payroll & Pensions Department Privacy Notice

Introduction

As a paid employee of the University or a student who is undertaking paid work, we are required to process your Personal Data for a range of purposes, including, but not limited to:

- Payment of salaries in accordance with your contract of employment;
- Legal reporting of salary payments/statutory deductions to HMRC;
- Remittance of Pension Contributions to the relevant pension fund (including AVC's);
- Accurate administration of your record with the Pension Funds.

This notice applies to all employees/students for whom pay is processed/pension administered via the Payroll & Pensions Department.

Types of Personal Data Processed

'Personal Data' refers to information which relates to an identifiable living individual. The types of Personal Data processed will depend on the circumstances relevant to you and would typically include, but not limited to:

- Personal Details – name, date of birth, address and gender;
- Remuneration/employment – staff number, employment start date, salary or payments due, bank account details, national insurance number, trade union membership;
- Incapacity/Ill-Health Data – relating to extended periods of absence from work (fit notes) and/or ill-health where this is relevant to the provision of benefits by the Scheme.

Under what legal basis does the processing of my personal data take place?

The General Data Protection Regulation (GDPR) provides for a number of different legal bases under which the processing of Personal Data may take place. Specific to the processing undertaken by the Payroll & Pensions Department, the following apply:

Necessary for the performance of a contract

Your contract of employment with the University will stipulate payments due in relation to your employment, including access to a pension arrangement.

Necessary for compliance with a legal obligation to which the University is subject

We are required to process and share certain information with HM Revenue & Customs (HMRC) on a monthly basis via Real Time Information (RTI). Data is shared via a secure electronic path between the University Payroll system and HMRC via the Government Gateway. We also have a legal responsibility under the Welfare Reform Act 2012, where instructed, to arrange deductions via a Direct Earnings Attachment (DEA) from salary and remit to the Department for Work & Pensions (DWP). Furthermore, we may be instructed by local authorities to apply and remit deductions via an Attachment of Earnings Order, via Regulation 37 of the Council Tax (Administration & Enforcement) Regulations 1992.

Necessary for the purposes of legitimate interests

Where information is required by a Pension Fund in order to process immediate payment of ill-health retirement benefits/full commutation benefits in cases where life expectancy is short; we would provide this on the belief that it is in your vital interests, although attempts to obtain consent would be made.

We are required to provide your personal data to any relevant third party where voluntary deductions are taken from pay and need to be remitted. This information is not shared with any other party other than that for which the information is intended. The following is a complete list of third parties that we would share information with in the event you voluntarily agree to deductions from pay: Universities Superannuation Scheme (USS), West Yorkshire Pension Fund (WYPF), National Employment Savings Trust (NEST), Prudential, Scottish Widows, Equitable Life, Unison, UCU, GMB, Unite, SODEXO, Sovereign Health, and Simply Health. Information shared will not exceed the requirement of the 3rd party.

Consent

A number of processes will rely on consent to enable us to process information, namely any voluntary deductions from pay that require remittance to a third party.

Where do we get your personal data from?

The majority of your information is obtained from you upon the start of your employment. Additional information may be issued by HMRC, such as National Insurance number.

Who else do we pass this information to?

Upon receiving your consent to process the voluntary deductions, your information will be shared with the following where relevant and appropriate to do so: Universities Superannuation Scheme (USS), West Yorkshire Pension Fund (WYPF), National Employment Savings Trust (NEST), Prudential, Scottish Widows, Equitable Life, Unison, UCU, GMB, Unite, SODEXO, Sovereign Health, and Simply Health. Information shared will not exceed the requirement of the 3rd party.

We must legally provide data on a monthly basis to HMRC and to DWP/Local Authorities where an earnings order is applied.

Do we transfer information overseas?

No information from the Payroll & Pensions Department is transferred overseas. We would not be permitted to do so without adequate protection in place.

How long do we keep this information for?

Our approach is to retain Personal Data for as long as is required and appropriate to satisfy the purpose for which it was collected/provided. We are required by HMRC to provide accurate Payroll records for 3 years from the end of the current tax year. Guidance from the Pensions Regulator suggests Pension information should be kept for a minimum of 6 years from date left Scheme which we adhere to.

What are your rights as a data subject?

As a person whose personal data we are processing, you have certain rights in respect of that personal data; you have the right:

- To withdraw consent;
- To access your personal data that we process;
- To rectify inaccuracies in personal data that we hold about you if it is inaccurate or incomplete;
- To request the deletion or removal of your personal data where there is no compelling reason for its continued processing;
- To restrict the processing of your personal data in certain ways;
- To obtain your personal data for reuse;
- To object to certain processing of your personal data;
- To complain to the Information Commissioners Office about the way in which we process your Personal Data.

Where can I get more information?

For more information please contact the University's Data Protection Officer, data-protection@bradford.ac.uk, University of Bradford, Richmond Road, Bradford, BD7 1DP