Higher Education Payroll Shared Services

GDPR
PRIVACY NOTICE

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Education Shared Business Services (ESBS)

PRIVACY NOTICE

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PRIVACY NOTICE

1. INTRODUCTION

This Privacy Notice provides an overview of how Higher Education Payroll Shared Services (HEPSS) processes the personal data of the Higher Education Institutions who onboard to this Payroll Shared Services platform. HEPSS respects your privacy and is committed to protecting your personal data. This Privacy Notice will inform you as to how we use your personal data when you engage with us.

Reference to your personal data in this document will include reference to any personal data relating to your payroll, travel and subsistence.

1.1 Background:

The Education Shared Business Services (ESBS) is a stand-alone division under the remit of the Department of Education and Youth. The Higher Education Payroll Shared Services was established as part of the ESBS to deliver a Payroll Shared Services on behalf of the Higher Education Sector.

2 IMPORTANT INFORMATION AND PURPOSE

2.1 Purpose of this Privacy Notice

The purpose of this Privacy Notice aims to inform the readers on how HEPSS collects and processes your data for the purpose of providing payroll services to the Higher Education sector. It is important that you read this Privacy Notice and any other notice that we may provide as part of data collection and processing of personal data, as we progress and expand our services.

2.2 Data Controller

The determination, purposes and means of processing of personal data is controlled by the individual Higher Education Institute.

2.3 Data Processor

The Higher Education Payroll Shared Services, Floor 5. The Generali Building, Blanchardstown Retail Park, Blanchardstown, Dublin 15, D15 YT2H, Ireland is the Processor responsible for the processing of personal data on behalf of the Controller.

Please contact the Department of Education and Youth Data Protection Officer at dpo@education.gov.ie if you have any queries in relation to how your personal data is processed by HEPSS. If you have questions in relation to this Privacy Notice, including any request to exercise your legal rights, please contact HEPSS_Helpdesk@esbs.gov.ie .

2.4 Personal Data

The purpose for which HEPSS requires the personal data is for the testing, development and the implementation of an integrated payroll and HR solution for the HE Sector. A contract is in place with CoreHR(People XD) to provide this integrated solution. Following Go-Live in respect of each Higher Education, HEPSS will process all payroll related activities. This includes payment of salary and processing all statutory and non-statutory deductions.

2.5 Legal Basis

ESBS – HE Payroll Shared Services processes personal data on behalf of the Higher Education Sector in line with the provision of services as specified in the Memorandum of Understanding (MOU); Data Processing Agreement (DPA) and the Service Management Agreement (SMA) in place with each Higher Education Institute. The appropriate legal basis relied on by each Higher Education Institute is that the processing is necessary for the purposes of carrying out the obligations and exercising specific rights of the controller or of the data subject in the field of employment and social security and social protection law in so far as it is authorised by Union or Member State law or a collective agreement pursuant to Member State law providing for appropriate safeguards for the fundamental rights and the interests of the data subject.

3 DATA PROCESSING

3.1 Categories of Data Subject

All Information received will be processed by HEPSS on behalf of Higher Education Institutions where their payroll function has transitioned to the Higher Education Payroll Shared Services.

3.2 Receipt of the Data

Access to data is strictly limited to relevant staff, who are fulfilling a specific function for or on behalf of HEPSS. Additional information is contained in both the Data Processing Agreement and the Data Protection Impact Assessment.

3.3 Categories of Personal Data

A list of the type of personal data being processed by HEPSS is detailed in the Data Processing Agreement. Some examples of categories of personal data processed by HEPSS include details for payees, payroll information, bank account details, pension information and special category personal data in the form of trade union membership information and illness benefits where applicable.

3.4 Storage Period / Retention

As outlined in the Data Processing Agreement, HEPSS will retain personal data relating to the payees for each Higher Education Institute for the duration of the provision of services by HEPSS to that Higher Education Institute. In general, personal data for HEIs' staff may be retained for up to 80 years to facilitate the processing of relevant data for the purpose of approving a pension for the retired staff member or a survivor's pension.

3.5 GDPR

HEPSS operates under the guiding principles of GDPR. Accordingly, HEPSS undertakes to:

i. Process all Personal Data lawfully, fairly and in a transparent manner;
ii. Collect Personal Data for various specified, explicit and legitimate purposes and use it only in ways that is compatible with those purposes;
iii. Ensure Personal Data is adequate, relevant and limited to what is necessary in relation to the purpose(s) for which it was collected;
iv. Keep Personal Data accurate and where necessary, up to date at all times;
v. Take all reasonable steps to erase or correct inaccurate data;
vi. Retain Personal Data for no longer than required for the specified purpose(s);
vii. Keep Personal Data safe and secure, including by taking appropriate technical and organisational measures against accidental loss, alteration, unauthorised disclosure of or access to Personal Data.

3.6 Data Subject Legal Basis

The Data Subjects for which data is processed in ***Table 1*** below are employees of all Higher Education Institutes where their payroll function has transitioned to the Higher Education Payroll Shared Services.

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Table 1

Processing Activity / Purpose	Type of Data	Legal Basis
Approval and Payment of Salaries	• PPSN • Employee First name • Employee Surname • Employee Payroll No. • Status • Salary Scale • Scale Point • Workgroups • Pension Scheme ID • Higher Education ID • Employee BIC / IBAN • Trade Union Membership • Employee tax details – RPNs, USC, PAYE, PRSI etc. • PRSI Weeks Override • Employee Pay code • Non statutory deductions • Leaves including sick leave, maternity / paternity leave, etc.	Processing is necessary for the purposes of carrying out the obligations and exercising specific rights of the controller or of the data subject in the field of employment and social security and social protection law in so far as it is authorised by Union or Member State law or a collective agreement pursuant to Member State law providing for appropriate safeguards for the fundamental rights and the interests of the data subject.
Payment of Expense	• Employee First name • Employee Surname • Employee Payroll No. • Employee IBAN / BIC • Staff ID • Project Code	Processing is necessary for the purposes of carrying out the obligations and exercising specific rights of the controller or of the data subject in the field of employment and social security and social protection law in so far as it is authorised by Union or Member State law or a collective agreement pursuant to Member State law providing for appropriate safeguards for the fundamental rights and the interests of the data subject.
Process Timesheet for causal / part-time staff	• Employee Name • Pay Group • Cost Centre • Pay Code • Scale Point • Staff ID • Rate of Pay • Project Code • PRSI Weeks Override	Processing is necessary for the purposes of carrying out the obligations and exercising specific rights of the controller or of the data subject in the field of employment and social security and social protection law in so far as it is authorised by Union or Member State law or a collective agreement pursuant to Member State law providing for appropriate safeguards for the fundamental rights and the interests of the data subject.

Any Higher Education Institute employee who wishes to exercise their right of access to their personal data, or any of their other rights under Article 12 to 23 of the GDPR, should contact the Data Protection Officer in the relevant HEI. Complaints can be made to the DPO for each Higher Education Institute or to the Data Protection Commission www.dataprotection.ie.

3.7 Data Security

HEPSS has put in place appropriate security measures to prevent your personal data from being accidentally lost, used or accessed in an unauthorised way, altered or disclosed. In addition, HEPSS restricts access to HEI Personal Data so that access is limited to employees, agents and/or approved sub-processors of the HEPSS who require it for the purpose of providing the contracted services to the respective HEI and only to the extent necessary in relation to his/her role in such activity. HEPSS will not appoint (or disclose any HEI Personal Data to) a new Sub-processor except with the prior written consent of the HEI(s) concerned.

3.8 International Transfers

HEPSS will not transfer personal data to locations outside the state or EEA.

4 LEGAL RIGHTS

HEPSS as a processor will maintain appropriate policies, procedures and training to implement Data Subject Rights as follows;

4.1 Right to access by the Data Subject

HEPSS as a processor will take instructions from the Controller as it relates to access by the Data Subject.

4.2 Right to Rectification

HEPSS as a processor will take instructions from the Controller as it relates to the rights to rectification.

4.3 Right to Restriction of Processing

HEPSS as a processor will take instructions from the Controller as it relates to the restriction of processing.

4.4 Right to Complain

HEPSS will maintain a complaint process whereby the Controllers are able to contact the HEPSS GDPR Lead via HEPSS_Helpdesk@esbs.gov.ie The Data Protection Commissioner can be contacted at https://dataprotection.ie/en/contact/how-contact-us.