



PRIVACY NOTICE AND DATA HANDLING POLICY FOR SCHOOLS, ACADEMIES AND MULTI-ACADEMY TRUSTS

Author: Sue Bremner-Milne

Version 1.1

Date 23 April 2018

Who we are and what we do

SBM Financial Services Ltd is a company providing bursar support and consultancy services to schools, academies and multi-academy trusts (MATs), and in the course of our work we act as a “Data Processor” for them. In each case, the school, academy or MAT remains the “Data Controller”, and is responsible for handling requests from individuals employed by them pertaining to the data held.

What personal information do we use in our work and where does it come from?

Depending on the service agreement we have with each school, academy or multi-academy trust we may use the following personal information about individuals employed at a school, whether they have a contract of employment or are paid on a casual basis. This information will have been collected by the school, academy or MAT and given to us for the purposes explained below. No data is inferred or derived from other sources.

Personal data which may be used:

- name
- address
- date of birth
- telephone numbers
- email addresses
- name of next of kin
- NI number
- Data related to job role:
 - personnel number / numbers
 - job title
 - whether contract of employment is permanent or temporary
 - hours per week and weeks per year worked
 - salary point and value
 - allowances payable
 - incremental progression
 - membership of pension scheme

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What do we do with this data and what is the lawful basis for using it?

- Updating and maintaining HR data and personnel records which could involve using all of the data listed above.
- Financial management and planning work which uses names and data related to job roles. This work could include:
 - setting budgets
 - revising budgets
 - undertaking reconciliation of actual salary payments against the budget plan
 - dealing with payroll queries raised by the school staff, the local authority or individual employees concerning their own records or payments.
- The lawful basis on which we are relying under the GDPR legislation is the “legitimate interests” basis. We use personal data as provided to us by our client schools, academies and MATs in order to ensure that employees are paid correctly and that school, academy and MAT budgets are charged correctly for those salaries.

Who do we share personal data with?

- Providers of payroll services. For a maintained school this will be the local authority or the LA’s designated payroll provider. For academies or MATs it will be the designated payroll provider appointed by their Board of Trustees.
- Payroll service providers will then share personal data with:
 - Teachers’ Pension Scheme administrators
 - Local Government Pension Scheme administrators
 - HMRC

How long do we retain personal data?

For the current financial year and up to six previous financial years

How is personal data stored?

The principle means of storing personal data is in the systems provided by the school, academy or MAT for which we are working – these could be electronic or paper-based



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filing systems, and as Data Controller, it is the responsibility of the school to ensure the security of those systems.

Sometimes, however, bursars or consultants employed by SBM Financial Services Ltd will need to take and store budgets or reports containing personal data off-site so that they can work elsewhere. This may be the case when:

- it was not possible to complete work during a planned visit
- bad weather or site closures prevent work being undertaken on-site
- the bursar or consultant is unable to travel to site
- it has been agreed by the Headteacher or other responsible officer that the bursar or consultant can work off-site for other reasons.

When personal data is taken off-site by a bursar or consultant it will be subject to the following controls.

- Laptops are password-protected and the passwords will be changed quarterly.
- The hard drives in old or obsolete laptops are securely destroyed before disposal.
- Mobile telephones from which emails may be read or data accessed will have passcodes.
- Memory sticks onto which data is downloaded will be encrypted, and are backed up to a secure cloud-based storage facility such as Dropbox every week.
- Bursars and consultants use a cloud-based storage facility such as Dropbox, and access to files for each school, academy or MAT will be password-protected, and will be restricted to:
 - the bursar or consultant working with the school, academy or MAT to which the data belongs, and
 - the SBM Financial Services management team, so that urgent access to the data can be maintained if the school's, academy's or MAT's designated bursar or consultant is absent or unavailable.



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More information about SBM Financial Services Ltd

- Our address is PO Box 538, Witney, Oxon OX28 9LZ
- Our landline number is 0330 123 9489
- Because so much of our work involves the use of personal data pertaining to budgets and payroll reconciliation for our client schools, academies and MATs, we must appoint a Data Protection Officer. Our DPO is **Sue Bremner-Milne**, who has completed a training course to enable her to fulfil this role. We have considered all our options relating to this appointment, and established that there are no conflicts of interest arising which would prevent Sue from taking this role, even though she is the Managing Director of SBM Financial Services.
- All data protection queries should be directed to Sue, and her contact details are as follows:
 - tel: 0330 123 9489
 - mobile 07813 797559
 - email sue.bm@sbm-finance.co.uk
 - postal address as above
- All SBM Financial Services bursars and consultants will have undertaken GDPR training provided by Citation, by the end of July 2018.
- Client schools, academies or MATs may request copies of our service agreement with them, if their own copy cannot be found or if an individual employed by them wishes to see it and the school, academy or MAT is content that they should do so and gives written permission for our DPO to disclose it.