

Fair Processing Notice – National Fraud Initiative

Background

The National Fraud Initiative (NFI) is an exercise that matches electronic data within and between public and private sector organisations to prevent and detect fraud. The NFI is run by the Cabinet Office.

Further details of the NFI can be found on the GOV.UK website at [this link](#).

This notice sets out how your personal data is used, and your rights in line with data Protection Legislation (including the Data Protection Act 2018 and General Data Protection Regulation (GDPR)).

The Data

As a Combined Authority, we are required to share data with The NFI on a mandatory basis, and we submit data for:

- Trade Creditors
- Payroll
- Transport Passes & Permits

There are data specifications which set out exactly what data we process in the above areas for this data matching exercise. Further information can be found at [this link](#).

Criminal Convictions

Should data matching through the NFI result in a prosecution, then this may also be recorded by participating organisations. This information is for recording outcomes purposes only and the data won't be shared further.

Purpose

The purpose(s) for which we are processing your personal data is: To assist in the prevention and detection of fraud.

Automated Profiling

Your personal data will be subject to the following automated profiling (as defined in Article 4, paragraph 4 UK GDPR):

Data matching involves comparing sets of data, such as the payroll or benefits records of an organisation, against other records held by the same or another organisation to see how far they match. The data is usually personal information. The data matching allows potentially fraudulent claims and payments to be identified. Where a match is found it may indicate that there is an inconsistency that requires further investigation. No assumption can be made as to whether there is fraud, error, or other explanation until an investigation is carried out.

All organisations participating in the Cabinet Office's data matching exercises receive a report of matches that they should investigate, to detect instances of fraud, over or under-payments and other errors, to take remedial action and update their records accordingly.

Legal basis of processing

The legal basis for processing your personal data is that processing is necessary for the performance of a task carried out in the public interest or in the exercise of official authority vested in the data controller. The National Fraud Initiative is conducted using the data matching powers bestowed on the Minister for the Cabinet Office by Part 6 of the Local Audit and Accountability Act 2014.

Under the Local Audit and Accountability Act legislation:

- The Cabinet Office may carry out data matching exercises for the purpose of assisting in the prevention and detection of fraud.
- The Cabinet Office requires certain organisations (as set out in the Act) to provide data for data matching exercises.
- The Cabinet Office may disclose the results of data matching exercises where this assists in the prevention and detection of fraud, including disclosure to organisations that have provided the data and to auditors that it appoints as well as in pursuance of a duty under an enactment.
- The Cabinet Office may disclose both data provided for data matching and the results of data matching to the Auditor General for Wales, the Comptroller and Auditor General for Northern Ireland, the Auditor General for Scotland, the Accounts Commission for Scotland and Audit Scotland, for the purposes of preventing and detecting fraud.
- Wrongful disclosure of data obtained for the purposes of data matching by any person is a criminal offence. A person found guilty of the offence is liable on summary conviction to a fine not exceeding level 5 on the standard scale.
- The Cabinet Office must prepare and publish a Code of Practice. All bodies conducting or participating in its data matching exercises, including the Cabinet Office itself, must have regard to the Code.
- The Cabinet Office may report publicly on its data matching activities.

The processing of data by the Cabinet Office in a data matching exercise is carried out with statutory authority under its powers in Part 6 of the Local Audit and Accountability Act 2014. It does not require the consent of the individuals concerned under data protection legislation or the GDPR.

Recipients

Your information will be shared for the purposes of the NFI.

Your personal data will be shared with the Cabinet Office, who will then further share your data as necessary for the purposes of preventing and detecting fraud with:

- The Auditor General for Wales
- The Comptroller and Auditor General for Northern Ireland
- The Auditor General for Scotland
- The Accounts Commission for Scotland
- Audit Scotland

And with mandatory participants who include:

- District and county councils
- London and metropolitan boroughs
- Unitary authorities
- Combined authorities
- Police authorities
- Fire and rescue authorities
- Pension authorities
- NHS Trusts
- Foundation Trusts
- Integrated Care Boards
- Passenger transport authorities
- Passenger transport executives
- Waste authorities
- Greater London Authority and its functional bodies

In addition, the following bodies provide data to the NFI for matching on a voluntary basis:

- Private sector pension schemes (various)
- Metropolitan Police – Operation Amberhill
- Special health authorities
- Housing associations and other social housing providers
- Probation authorities
- National Park authorities
- Central government pensions schemes
- Insurance Fraud Bureau
- Central government departments
- Social Security Scotland
- Synectics Solutions Limited SIRA
- LexisNexis Risk Solutions Ltd
- AirBnB
- Tenancy Deposit Protection Scheme
- Credit reference agencies
- Other private organisations/companies

The Cabinet Office will share records containing personal data with HMRC. These will be matched against HMRC records and additional HMRC information appended and fed back to the NFI. The HMRC matching will seek to identify persons at the address provided and relevant income related information. Data matching services

are then provided to the NFI by the Department for Work and Pensions, and our IT Supplier using only UK Data Centres.

The Cabinet Office also share NFI data with Synectics Solutions Limited SIRA and LexisNexis Risk Solutions Ltd for them to use in their anti-fraud data matching services. Where your personal data is used for these purposes, Synectics Solutions Ltd and LexisNexis Risk Solutions Ltd are the responsible data controllers. Their privacy notices are available at the following links:

<https://risk.lexisnexis.com/corporate/data-privacy>
<https://www.synectics-solutions.com/privacy-policy>

Retention

Your personal data will be held by the Cabinet Office for the periods set out in their Data Deletion Schedule at [this link](#).

Your Rights

You have the right to:

- Request information about how your personal data is processed, and to request a copy of that personal data.
- Request that any inaccuracies in your personal data are rectified without delay.
- Request that any incomplete personal data are completed, including by means of a supplementary statement.
- Request that your personal data are erased if there is no longer a justification for them to be processed.
- In certain circumstances (for example, where accuracy is contested) to request that the processing of your personal data is restricted.
- You have the right to object to the processing of your personal data where it is processed for direct marketing purposes.

Who can you contact about data protection and your rights?

If you have any questions about how your information is being used, you can contact our Data Protection Officer at

DPO@liverpoolcityregion-ca.gov.uk

0151 330 1679

1 Mann Island, Liverpool, L69 3HN

The Cabinet Office acts as a data controller for this information. This is because they conduct the data matching exercise. They can be contacted at

nfiqueries@cabinetoffice.gov.uk

Head of the NFI

10 South Colonnade

Canary Wharf
London
E14 4QQ

The contact details for the data controller's Data Protection Officer (DPO) are:

dpo@cabinetoffice.gov.uk

Stephen Jones
DPO
Cabinet Office
70 Whitehall
London
SW1A 2AS

The Cabinet Office's Privacy Notice for the NFI can be found at [this link](#).

For independent advice about data protection, privacy, and data sharing issues or to lodge a complaint about how we have handled your information you can contact the Information Commissioner's Office (ICO) at:

casework@ico.org.uk

The Information Commissioner's Office,
Wycliffe House,
Water Lane,
Wilmslow,
Cheshire SK9 5AF

Telephone: 0303 123 1113