

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 Department for Work and Pensions (DWP).

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

Data specifications set out exactly the 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 decision making

Data matching involves the automated comparison of information held by different organisations to identify potential inconsistencies. A data match does not establish that fraud or error has occurred, and no decision is made solely as a result of the automated matching process. Matches may be prioritised for review but require human investigation before any decision or action is taken. Personal data will not be subject to automated decision making or profiling as defined by Article 22 UK GDPR.

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. Under Part 6 and Schedule 9 of the Local Audit and Accountability Act 2014 (LAAA 2014), the Secretary of State responsible for the Government's counter-fraud functions within the DWP holds the statutory powers to undertake data matching.

Under the Local Audit and Accountability Act legislation:

- The DWP may carry out data matching exercises for the purpose of assisting in the prevention and detection of fraud.
- The DWP requires certain organisations (as set out in the Act) to provide data for data matching exercises.
- The DWP 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 DWP 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 DWP must prepare and publish a Code of Practice. All bodies conducting or participating in its data matching exercises, including the DWP itself, must have regard to the Code.
- The DWP may report publicly on its data matching activities.

The processing of data by the DWP 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 DWP, 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, Greater London Authority and its functional bodies.
- Police authorities and, fire and rescue authorities
- Pension authorities
- NHS Trusts, Foundation Trusts and Integrated Care Boards
- Passenger transport authorities and passenger transport executives
- Waste authorities

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
- UK central government departments
- Social Security Scotland
- Rent Smart Wales
- Rent Smart Northern Ireland
- Synectics Solutions Limited SIRA
- LexisNexis Risk Solutions Ltd
- AirBnB
- Tenancy Deposit Protection Scheme
- Credit reference agencies
- Other private organisations/companies

The DWP 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 other parts of the DWP.

The DWP 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>

In very specific circumstances the NFI may also share your personal data with private business to support the data matching process and to identify new areas of fraud prevention and detection.

Where this happens and if necessary, NFI will provide more details. Currently NFI are working with:

- Airbnb Ireland UC - [Additional information about this work](#)

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 DWP acts as a data controller for this information. This is because they conduct the data matching exercise. To contact the data controller, email

nfiqueries@cabinetoffice.gov.uk

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

Email: data.protectionofficer@dwp.gov.uk

The Data Protection Officer provides independent advice and monitoring of the Department for Work and Pensions use of personal information.

The NFI Privacy Notice 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:

Email: icocasework@ico.org.uk

The Information Commissioner's Office,

Wycliffe House,

Water Lane,

Wilmslow,

Cheshire SK9 5AF

Telephone: 0303 123 1113