

## North Wales Fire and Rescue Service Privacy Notice – The National Fraud Initiative

### **Introduction**

Under Data Protection legislation, North Wales Fire and Rescue Service (NWFRS) is required to provide information to all individuals about any personal information we collect from them and how we use that information.

This document relates specifically to data processed as part of the National Fraud Initiative.

### **What is the National Fraud Initiative?**

NWFRS is required by law to protect the public funds it administers and may share information provided to it with other bodies responsible for auditing or administering those funds in order to prevent and detect fraud. The National Fraud Initiative (NFI) is one way that this is achieved.

The Auditor General for Wales (the Auditor General) audits the accounts of all Welsh public sector bodies and has tasked the Wales Audit Office (WAO) with undertaking the analysis required by the NFI.

The NFI is an exercise carried out every two years that aims to detect/prevent fraud and overpayments from the public purse across the UK.

It requires NWFRS (and a number of other public sector bodies) to collate a particular set of data over a 2 year period.

The analysis involves 'Data Matching'.

### **What is Data Matching?**

Data matching is the comparison of two or more sets of data.

For the NFI, the WAO will receive datasets from all of the mandatory organisations (such as NWFRS), as well as other public sector bodies that wish to participate.

These records are then compared, using electronic means, to see how far they match.

Where a match is found, it may indicate that there is an inconsistency which requires further investigation. This does not necessarily mean that there has been fraudulent activity or any overpayment, but what it does is highlight areas that may require further investigation.

### **What personal information is collected/provided for the NFI?**

The information used for this exercise is already held by NWFRS for employment purposes. The Auditor General specifies the information needed and it will include the same information about every employee. The following information is provided (we do not ask employees for any additional information purely for the NFI exercise):

- Staff Number, name and salary details;
- Date of Birth;
- Employee Contact details (such as telephone numbers and email address if held);
- Employee start and finish dates;
- National Insurance Number;

- Date last paid;
- Bank details including sort code;
- Details of role undertaken – e.g. hours of work, location of work and post number.
- Passport

### **Legal Basis to Process Your Data**

In order to collect or use personal information, for any purpose, we must have a valid legal or lawful basis.

In this particular case the following bases apply:

- **The processing is necessary for compliance with a legal obligation of the controller**

The information is requested by the Auditor General for Wales, under his powers under the Public Audit (Wales) Act 2004, as amended by the Serious Crime Act 2007. Under that legislation, the Auditor General has the power to conduct data matching (section 64a) and to identify organisations that must provide information to them. NWFRS is one those mandatory organisations, meaning we are required by law to provide the information.

In addition, as already stated, NWFRS has a responsibility to ensure that the public funds it is responsible for are appropriately managed, therefore the following also apply:

- **The 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 controller**
- **The processing is necessary for the purposes of the legitimate interests pursued by the controller**

### **Preparing the Information for the NFI**

As previously explained, the information provided for the NFI is already held by NWFRS. It is held by our HR department and is collated directly from the Management Information System.

For this exercise, the Senior Auditor of Conwy County Borough Council (CCBC) is responsible for collating and submitting the data on behalf of NWFRS. Only that individual has direct access to this entire dataset.

### **How long will the information be held?**

The submission prepared by CCBC will be held only until we have confirmation that it has been received by the WAO and has been accepted. Once that confirmation is received the report is deleted from CCBC systems.

The data itself will still be on our Management Information System as it is held for other employment purposes; however, it is not held as one report, and teams have access only to the elements needed for their particular role.

The WAO and the Auditor General securely destroy all the information within 6 months of its submission.

### **How we protect your information**

All of our IT systems and those of CCBC are protected by technical security measures to prevent unauthorised access, and those that retain your personal data are given access level controls, to ensure that only those people with the appropriate authorisation can access it.

The information itself is held on our Management Information System, which has in place access security – it is accessible only to those that require access to the data for their specific role, and they have access only to the parts of the system required for that role.

The data required for the NFI is collated from the different areas of our Management Information System. Direct access to that report is limited to the CCBC Senior Auditor, who is given that access only for the duration of the NFI exercise.

Once collated it is stored on a secure network drive with controlled access.

Disclosure of the final data set is done through a secure (encrypted) portal.

The WAO and the Auditor General are legally required to have in place specific security measures to comply with all relevant legislation, including Data Protection legislation.

### **More Information**

For more information about the powers of the Auditor General for Wales, and the National Fraud Initiative, please visit the website of the Wales Audit Office - [Wales Audit Office](#)

### **Your rights**

To enable individuals to have more control over the way their personal data is collected and used, data protection legislation gives you specific rights.

You have a legal right to request a copy of the information that we hold about you. Your request will be dealt with in line with Data Protection legislation. Please submit your request, in writing, to the Data Protection Officer (dpo@nwales-fireservice.org.uk).

NWFRS want to make sure that your personal information is accurate and you have the right to request we correct or remove information which you think is inaccurate.

You also have the right to ask for any personal data to be deleted, however, this applies only where it is inaccurate, incorrect and/or where there is no legal basis for us to retain it.

If you have any queries about the way NWFRS looks after your data, please refer to our employee privacy notice – [NWFRS privacy notices](#).

You also have the right to raise any concerns you have with the Information Commissioner, who is the legislative authority for data protection legislation. Further information can be found on their website - <https://ico.org.uk/concerns/> or you can contact them here:

The Information Commissioner's Office  
Wycliffe House  
Water Lane  
Wilmslow  
Cheshire  
SK9 5AF  
Telephone - 0303 123 1113