

# Corporate Anti-Fraud Team Privacy Notice

## Who we are and why we are publishing this notice

Harrow Council collects uses and is responsible for certain personal information about you. We are regulated under the General Data Protection Regulation (GDPR) which applies across the European Union (including in the United Kingdom) and we are responsible as 'controller' of that personal information for the purposes of those laws. The Data Protection Act 2018 also governs the use of Data and ensures we act within the law. Our Data Protection Officer is:

Marsha White  
Civic Centre  
Station Road  
Harrow  
HA1 2XY

[dpo@harrow.gov.uk](mailto:dpo@harrow.gov.uk)

This Privacy Notice broadly explains the purpose for processing, the legal basis, categories of personal information collected, who we may share it with and your rights.

It applies to all personal information collected for or on behalf of the Council whether by letter, email, face-to-face, telephone, online or any other method.

## Purpose for processing your information

This authority has a legal duty to protect the public funds it administers, and may use information held about you for all lawful purposes, including but not limited to the prevention and detection of crime including fraud and money laundering.

One of the primary objectives of the Council's [Corporate Anti-Fraud & Corruption Strategy](#) is to ensure the prevention of fraud and corrupt acts and to ensure that any instances or allegations of these are investigated and dealt with effectively. As part of this strategy we may conduct a programme of pro-active counter fraud reviews into transactions and records held across different business areas. They are designed specifically to identify unusual, incorrect or potentially fraudulent transactions.

## Our legal basis for using the information you provide?

The legal basis for processing and or sharing your personal information is under article 6(1)(c) and 6(1)(e) of the General Data Protection Regulations. We process your information as part of our compliance with a legal obligation and under our public tasking duties.

The legal basis for Counter Fraud investigations is set out below:

- Section 151, Local Government Act 1972
- The Council Tax Reduction Schemes (Detection of Fraud and Enforcement) (England) Regulations 2013
- Local Audit and Accountability Act 2014 (Part 6)
- Section 68 of the Serious Crime Act 2007
- Prevention of Social Housing Fraud Act 2013
- The Money Laundering, Terrorist Financing and Transfer of Funds (Information on the Payer) Regulations 2017
- Fraud Act 2006

- Criminal Procedures and Investigations Act 1996
- Schedule 2, Data Protection Act 2018
- The Police & Criminal Evidence Act 1984 (PACE)

As a Local Authority we are required to participate in the Cabinet Office's National Fraud Initiative: a data matching exercise to assist in the prevention and detection of fraud. This involves the provision of particular sets of data to the Minister for the Cabinet Office for matching, for each exercise, as detailed on the [National Fraud Initiative page from GOV.UK](#).

The use of data by the Cabinet Office in a data matching exercise is carried out with statutory authority under Part 6 of the Local Audit and Accountability Act 2014. It does not require the consent of the individuals concerned under the Data Protection Act 2018. View further information on the Cabinet Office's legal powers and the reasons why it matches particular information on the [National Fraud Initiative privacy notice from GOV.UK](#)

Harrow Council may disclose information you provide to a Specified Anti-Fraud Organisation (SAFO) for the purposes of preventing fraud. The personal information we have collected from you will be shared with fraud prevention agencies who will use it to prevent fraud and money-laundering and to verify your identity. A SAFO enables or facilitates the sharing of information for the prevention of fraud and is specified by an order made by the Secretary of State. If fraud is detected, you could be refused certain services, finance, or employment. Further details of how your information will be used by us and these fraud prevention agencies, and your data protection rights, can be found by visiting [CIFAS](#).

Disclosures of information from a public authority to a SAFO are subject to a Code of Practice and this, along with a full list of SAFO's we may share information with, can be found on the Home Office website below.

<https://www.gov.uk/government/publications/data-sharing-for-the-prevention-of-fraud-code-of-practice>

### **We collect and process the following categories of personal information:**

- Personal and family details
- Lifestyle and social circumstances
- Goods and services
- Financial details
- Employment and education details
- Housing needs
- Visual images, personal appearance and behaviour
- Licenses or permits held
- Student and pupil records
- Business activities
- Case file information
- Criminal convictions and offences

We may also collect and process special categories of personal information that may include:

- Racial or ethnic origin
- Political opinions
- Religious or philosophical beliefs
- Trade union membership
- Genetic data, biometric data for the purpose of uniquely identifying a person

- Data concerning health
- Data concerning a person's sex life or sexual orientation

## **How we collect your information**

We collect information in a number of ways, for example, by letter, written applications for services, email, face-to-face, other agencies, telephone calls and online forms.

## **Who we may share your information with**

We will share personal information with law enforcement or other authorities if required by applicable law such as:

- The Cabinet Office
- Government agencies
- Specified anti-fraud organisation's
- The Police
- Judicial agencies e.g. Courts
- Department of work and pensions
- HMRC
- Local authorities
- In certain circumstances employers
- Credit reference agencies

We will only share information with these organisations where it is appropriate and legal to do so. We may also share information, for example, if there is a risk of serious harm or threat to life. Where this is necessary, we are required to comply with all aspects of the General Data Protection Regulation and the Data Protection Act 2018.

## **Keeping your information secure**

We have appropriate security measures in place to prevent personal information from being accidentally lost or used or accessed in an unauthorised way. We limit access to your personal information to those who have a genuine business need to know it. Those processing your information will do so only in an authorised manner and are subject to a duty of confidentiality.

We also have procedures in place to deal with any suspected data security breach. We will notify you and any applicable regulator of a suspected data security breach where we are legally required to do so.

## **How long do we keep your information?**

We will only keep your information for as long as is required by law and to provide you with the necessary services. For further details you can submit a request via the [Request for Information](#) page.

We may also anonymise some personal data you provide to us to ensure that you cannot be identified and use this data to allow the Council to effectively target and plan the provision of services.

## **Your Rights and Access to your information**

You have the right to request a copy of the information that we hold about you.

The new General Data Protection Regulation also gives you additional rights about the information we hold about you and how we use it, including the right to:

- Withdraw consent and the right to object and restrict further processing of your data; however, this may affect service delivery to you.
- Request to have your data deleted where there is no compelling reason for its continued processing and provided that there are no legitimate grounds for retaining it.
- Request your data to be rectified if it is inaccurate or incomplete.
- Have your data transferred or copied should you move to another authority.
- Not be subject to automated decision-making including profiling.

To request information that we hold about you visit our [Subject Access Request](#) page.

### **Changes in your personal circumstances**

You must notify us immediately if there are any changes in your circumstances and personal details so we can maintain an accurate and up to date record of your information.

### **If you have any concerns**

You have a right to complain to us if you think we have not complied with our obligation for handling your personal information; please visit our [Compliments and Complaints](#) page.

If you are not satisfied with the Council's response you have a right to complain to the Information Commissioner's Office (ICO). You can [report a concern by visiting the ICO website](#).

### **Changes to our Privacy Policy**

As the Council creates new services or enters into new partnership agreements, this may generate the need to amend the Privacy Notice. If our Privacy Notice changes at any time in the future, it will be posted on this page.