

**NORTH EAST
SCOTLAND
COLLEGE**



NATIONAL FRAUD INITIATIVE PRIVACY NOTICE



North East Scotland College (NESCol) is providing you with this information so you know how we collect personal data (information) about you, what we do with it and why. This document – our National Fraud Initiative privacy notice – will tell you about our processing and about the rights you have in relation to how we use your data. It will also provide you with the details of who to contact if you have any questions or concerns.

WHO ARE WE?

North East Scotland College (NESCol) is responsible for looking after the personal data you give us when are employed by us or do business with us. We are known as the 'data controller'. Our address is:

North East Scotland College
Gallowgate
Aberdeen
AB25 1BN

Our Data Protection Officer (DPO) is Jacqueline Gillanders and if you have any questions about the processing of your personal data or your rights as a data subject you should contact the College's Data Protection Officer in the first instance. Her contact details are:

Jacqueline Gillanders
Data Protection Officer

North East Scotland College
Gallowgate
Aberdeen
AB25 1BN

Dataprotection@nescol.ac.uk

WHY DO WE COLLECT AND USE INFORMATION ABOUT YOU?

The College is required by law to protect the public funds it administers and is required to share information provided to it with other bodies responsible for auditing or administering public funds, in order to prevent and detect fraud.

On behalf of the Auditor General for Scotland, Audit Scotland appoints the auditor to audit the accounts of the College. It is also responsible for carrying out data matching exercises as part of the National Fraud Initiative. The NFI runs every two years and uses data matching to compare information that different public bodies hold about individuals, and that might suggest the existence of fraud or error.

Data matching involves comparing computer records held by one body against other computer records held by the same or another body to see how far they match. This will include personal information. Computerised data matching allows potentially fraudulent claims and payments to be identified but the inclusion of personal data within a data matching exercise does not mean that any specific individual is under suspicion. Where a match is found it indicates that there may be 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. The exercise can also help bodies to ensure that their records are up to date.

NESCol is required to provide specific sets of data to Audit Scotland for matching purposes. Information on the data sets can be found at: <https://www.audit-scotland.gov.uk/report/the-national-fraud-initiative-in-scotland>

OUR LAWFUL BASIS FOR THE PROCESSING

The College lawful basis for processing data for NFI purposes is:

- GDPR Article 6 (c) – processing is necessary for compliance with a legal obligation to which the controller is subject.

The use of data by Audit Scotland in a data matching exercise is carried out under their statutory authority, normally under its powers in Part 2A of the Public Finance and Accountability (Scotland) Act 2000. It does not require the consent of the individuals concerned under the Data Protection Act 2018. Data matching by Audit Scotland is subject to a Code of Practice. This may also be found at: <http://www.audit-scotland.gov.uk/our-work/national-fraud-initiative>

WHAT INFORMATION DO WE COLLECT ABOUT YOU?

As part of your employment with the College we collect a range of relevant information about you – this is detailed in the Staff Privacy Notice. When you do business with us we also collect specific data for procurement and payment purposes. For the purposes of the NFI, data shared between NESCol and Audit Scotland is defined in the NFI data sets:

- Payroll data
- Trade creditors standing data
- Trade creditors history

https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/903493/Payroll-data-specification-2020-2021.pdf

https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/903490/Trade-creditors-payment-history-data-specification-2020-2021.pdf

HOW DO WE COLLECT INFORMATION ABOUT YOU?

We collect this personal information about you when you apply for a job with NESCol, when you accept a job with us and when you enter into a business arrangement with us, for example to supply goods or services.

WHO YOUR INFORMATION WILL BE SHARED WITH AND WHY?

For the purposes of the NFI your data is shared, via a secure portal, with Audit Scotland.

HOW LONG DO WE KEEP YOUR DATA?

Your employment data is kept by NESCol in line with its retention policy for staff records. Data extracted from existing systems for upload to the NFI portal is securely deleted as soon as it is uploaded.

DO WE USE AUTOMATED DECISION-MAKING PROCESSES, INCLUDING PROFILING?

Automated decision making is not used as part of this process.

YOUR RIGHTS

You have legal rights about the way the College manages and uses your personal data. You can:

- Ask for a copy of your data, free of charge
- Ask the College to change any data held about you that is incorrect or incomplete
- Ask the College to stop using your personal data until it is rectified.
- Ask for the use of your data to be restricted

- Ask the College to erase your data (known as the 'right to be forgotten')
- Tell us that you have changed your mind if you have previously given consent for your information to be used for a particular purpose
- Ask the College for a portable electronic copy of your data (data portability).

Not all of these rights are absolute, which means they may only apply in certain circumstances. The College website has more information on your rights (www.nescol.ac.uk/dataprotection) and you can also contact our Data Protection Officer for help.

You can also contact the Information Commissioner's Office if you think that your data is not being processed in accordance with Data Protection legislation. Their helpline is 0303 123 1113 and their website is at www.ico.org.uk

For further information on how the National Fraud Initiative works, please contact:

Muir Wilson, *Financial Controller (External Affairs)*
Telephone 01224 612057
Email: muir.wilson@nescol.ac.uk



T: 0300 330 5550
E: enquiry@nescol.ac.uk

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www.nescol.ac.uk