

## **Solihull Metropolitan Borough Council – Taxi and Private Hire Licensing** **National Register of Refusals, Revocations and Suspensions (NR3S) Policy**

### **Introduction**

The Local Government Association (LGA) has commissioned the 'National Register of Refusals, Revocations and Suspensions' ('NR3S'). The NR3S contains information relating to any refusal to grant, or revocation of a hackney carriage or private hire driver's licence. It is therefore a mechanism for licensing authorities to share details of individuals who have had a hackney carriage or private hire driver's licence revoked, refused, or suspended. The NR3S is hosted by the National Anti-Fraud Network (NAFN) and access to the register is available to NAFN members only.

### **The purpose of NR3S**

The objective of the NR3S is enable properly informed decisions to be made by a Local Authority on whether an applicant for a hackney carriage or private hire driver's licence is a fit and proper person to hold such a licence, in the knowledge that another authority has previously reached a negative view on the same person. Solihull Metropolitan Borough Council ("the Council") has signed up to use NR3S as a member of NAFN and will have regard to specific user guidance and training materials on using the register - published separately by the LGA and NAFN.

NR3S will allow the Council to record details of where a hackney carriage or private hire driver's licence has been refused, revoked or suspended and allow it to check new applicants against the register. In this policy, the 'first authority' refers to a licensing authority which made a specific entry onto the NR3S; the 'second authority' refers to a licensing authority which is able to search the register when an application is received for a new driver's licence, or to renew an existing driver's licence and is seeking more detailed information about an entry on the register.

The first authority can then provide information to the second authority, enabling the second authority to take the earlier action into account in their decision making process and make an informed decision as to whether or not the licence should be granted or renewed.

### **Scope of this Policy**

In order to comply with the Data Protection Act 2018 (DPA), the UK General Data Protection Regulation (UK GDPR) and the Human Rights Act 1998, it is essential that the first authority that provides information about entries on the NR3S register, and the second authority that requests and receives such information, both have clear policies. The policies should detail how and when such information will be requested, provided, and how any information provided can then be used, and this policy aims to do that. This policy covers how the Council will use NR3S and how it will comply with data protection requirements as a data controller in relation to the Council's processing of personal data in connection with NR3S, including in relation to uploading information to NR3S, checking NR3S, and disclosing or receiving information about individuals who appear on NR3S.

The Council has also signed up to data sharing and data processing agreements with NAFN. These agreements also outline the necessary steps the Council has taken to ensure compliance with data protection legislation as outlined above.

## **Procedures for using NR3S**

### **i. Adding details of a refusal or revocation to NR3S**

Where an application for a hackney carriage or private hire driver's licence is refused, or an existing licence is revoked or suspended, the Council will record this decision on NR3S. The information recorded on NR3S will be limited to an individual's:

- Name
- Date of birth
- Address and contact details
- National insurance details
- Driving licence number
- Decision taken i.e. revocation, suspension or refusal
- Date of decision; and
- Date decision effective

### **ii. Checking the NR3S register as part of the application and renewal process and making a request for further information regarding an entry on NR3S**

When an application is made to the Council for the grant of a new, or renewal of a hackney carriage or private hire driver's licence, the Council will carry out a search on the NR3S register. The Council will then retain a clear record of every search that is made of the register. This will detail:

- The date of the search
- The name or names searched
- The reason for the search (new application or renewal)
- The results of the search; and
- The use made of the results of the search (this information will be entered to the register at a later date)

This record will not be combined with any other records (i.e. combined with a register of licences granted) and will be retained for a period of 11 years.

If the Council finds a match (i.e. there is an entry in the register for the same name and identifying details) a request will be made to the authority that entered those details (the first authority) for further information about that entry by asking for more details of the revocation, suspension or refusal of the drivers' licence by the first authority.

This request will be made in writing in accordance with the form at Annex C of this policy. It will be emailed to the contact address of the authority that entered those details (the first authority) which will be detailed in the register. If information is shared with the Council by the first authority this will then be used to help reach a decision about the application.

### **iii. Using any information obtained as a result of a request to another authority**

When the Council receives information as a result of a request that has been made to another authority, it will take that information into account when determining the application for the grant or renewal of a hackney carriage or private hire drivers' licence. This will be in accordance with the usual process for determining applications.

The Council will make and retain a clear record of the use that is made of the results of the search (this information will be added to the register detailed above). Information that is received may warrant significant weight being attached to it, but it will not be the sole basis for any decision that the Council will make in relation to the application

Licensing authorities are legally required to consider each licence application on its own merits and cannot refuse an application simply because an individual may be recorded on NR3S. The purpose of NR3S is to ensure that authorities have all of the information necessary to help them reach a decision on whether an individual is fit and proper. If circumstances have materially changed since the decision that has been recorded on NR3S, it may be appropriate for an alternative decision to be made.

### **iv. Responding to a request made for further information regarding an entry on NR3S**

When the Council receives a request for further information from another authority a clear record will be made of the request having been received. This record will not be combined with any other records (i.e., combined with a register of licences granted) and will be retained for a period of 11 years.

The Council will then determine how to respond to the request. The Council will not simply provide information as an automatic response to every request.

An authorised officer will record what action was taken and why. The Council will make and retain a clear record of every decision that is made as a result of a request from another authority. This will detail:

- the date the request was received
- how the request was considered against data protection legislation and its conclusions
- the name or names searched
- whether any information was provided
- if information was provided, why it was provided (and details of any further advice obtained before the decision was made)
- if information was not provided, why it was not provided (and details of any further advice obtained before the decision was made); and
- how and when the decision (and any information) was communicated to the requesting authority
- This record will not be combined with any other records and will be retained for a period of 11 years

### **Compliance with data protection legislation**

The Council will consider compliance with data protection legislation on each occasion. This will consider how the second authority will use the data, how it will store that data to prevent unauthorised disclosure, the retention period for that data, and the mechanism for erasure or destruction of the data at the end of that period. It is expected that if the second authority has

adopted a policy similar to this, that should be a reasonably straightforward process. If the Council is not satisfied that the second authority's policy is satisfactory, no disclosure can be made. In such circumstances it is essential that discussion takes place as a matter of urgency between the Council and the second authority and involves the Information Governance team/Data Protection Officers as appropriate.

i) Consideration of request

Consideration will then be given as to what information will be disclosed. This will be determined by an officer who has been trained authorised to discharge this function. Any disclosure must be considered proportionate, taking into account the data subject's rights and the position and responsibilities of a hackney carriage or private hire driver, to ensure disclosure is not arbitrary. The Council will and must carefully consider what information, if any, to reveal to the requesting authority. The Council will not automatically disclose information relating to every entry. Each application will be considered on its own merits. This is not intended to undermine the effects of the register: it is essential to ensure that disclosures are compatible with data protection legislation and the Human Rights Act. In making its decision the authority must consider the nature and seriousness of the conduct which led to the revocation, suspension or refusal to renew, and the time that has elapsed since the decision was made.

i) Purpose and legal basis for processing

Any information that is received from the first authority or shared with a second authority in relation to an application will only be used in relation to that application, and the determination of it, and will not be used for any other purpose. Any such data that is received (referred to below as "relevant data") will only be kept for as long as is necessary in relation to the final determination of that application. This will include the period of time processing that application, making a decision, notifying the applicant of the outcome of that decision, and any appeal processes. The legal basis for processing this information is that it is necessary for the performance of a task carried out in the public interest or in the exercise of official authority vested in the licensing authority – that is, assessing whether an individual is a fit and proper person to hold a hackney carriage or private hire driver's licence. Any information about convictions will be shared in accordance with this policy under schedule 1, part 2, paragraph 6 of the DPA; that is, the processing is necessary for reasons of substantial public interest in connection with the exercise of a function conferred on the authority by an enactment or rule of law.

However, in every case, consideration will be given to the full circumstances of the decision, and there may be occasions where information is provided other than in accordance with this policy. The reasons for this will be recorded.

ii) Retention of information

Data is held on the NR3S register for a period of 11 years, in line with the national NR3 guidance set by NAFN as a result of the statutory duties on Local Authorities and prescribed under sections 51, 59 and 61 of the Local Government (Miscellaneous Provisions) Act 1976; sections 13, 16 and 17 of the Private Hire Vehicles (London) Act 1998; section 3 of the Private Hire Vehicles (London PHV Driver's Licences) Regulations 2003; sections 25 and 30 of the London Cab Order 1934; sections 9 and 19 of the Plymouth City Council Act 1975 and section 46 of the Town Police Clauses Act 1847.

In the event of an appeal in respect of the determination of an application being made to the Courts within the requisite period, the relevant data will be retained for 35 days following the final disposal of all appeal proceedings including an appeal by way of case stated (which will

include potential appeals to the Court of Appeal and Supreme Court). The appeal period is 21 days from the date on which the written notification of the decision was received by the applicant or licence holder. An appeal must be lodged within that time period, and no extension of that period is permissible (see *Stockton-on-Tees Borough Council v Latif* [2009] LLR 374). However, to ensure that the information is available if an appeal is lodged and there is a dispute over time periods, a period of 35 days is specified.

iii) Rights of data subjects

Full information for licensees and applicants about how the Council use their information, including that contained on the NR3S can be found in the Taxi Licensing privacy notice on the application form for a private hire or hackney carriage driver's licence. Notification of the NR3S to existing licensees will be given in general on the website of the Council and by correspondence substantially in the form shown at Annex A.

A licensee or applicant has various rights in relation to their data: the right to request access to the data; the right to rectification or erasure of the data; the right to restrict processing of the data, and the right to object to the processing of data for this purpose. Instructions on how to exercise these rights can be found at the 'Your Rights' section of: [Data Protection | solihull.gov.uk](https://www.solihull.gov.uk). It is not intended that any NR3S data will be transferred out of the United Kingdom.

Where the reason for refusal to grant or revocation/suspension relates to a conviction which is within the timescales determined in the council's current Suitability Policy [Taxi Licensing Policy 2020 \(solihull.gov.uk\)](https://www.solihull.gov.uk), the information will usually be disclosed. Where the reason for refusal to grant or revocation/suspension relates to a conviction which is outside the timescales determined in the Suitability Policy, the information will not usually be disclosed.

iv) Historic revocations, refusals and suspensions

Historic details of revocations, refusals or suspensions of a hackney carriage or private hire driver's licence will be added to the NR3S. Notification of this will be given to former licence holders whose licence was revoked or applicants who were refused a licence. This will be done by notification on the Council's website in direct correspondence substantially in the form shown at Annex B. Historic data will not go back beyond the retention period of 11 years.

Individuals whose details are added to NR3S from the date of the adoption of this policy will be notified of this at the point at which they are advised of the decision made to refuse, revoke, or suspend a licence.

Outside of these times, an individual can make a subject access request (SAR) for any of their personal data held on NR3S. The 'data controller' in respect of this data is the Council, to whom a SAR should be submitted in the first instance. As the 'data processor', that is the organisation storing the data, NAFN will fulfil this request. Similarly, the exercise of any other rights provided under data protection legislation should be made to the Council in the first instance.

## **Annex A**

### **Notification to former licence holders or applicants whose details will be entered onto NR3S**

Dear XXXX

#### National Register of Refusals and Revocations and Suspensions

To help strengthen hackney carriage and private hire licensing for the benefit of both passengers and responsible licensed drivers, the Taxis and Private Hire Vehicles (Safeguarding and Road Safety) Act 2022 has established a national database: National Register of Refusals and Revocations and Suspensions (NR3S), hosted by the National Anti-Fraud Network (NAFN) Data and Intelligence Services.

The purpose of the NR3S register is to provide a mechanism for licensing authorities to share details of individuals who have had a hackney carriage or private hire driver's licence revoked or suspended, or an application for one refused.

From 27 April 2023, all licensing authorities in England are required to:

- Add details of any refusal to issue or renew a hackney carriage or private hire driver's licence application to the NR3S register relating to safeguarding or road safety concerns.
- Record details on the NR3S register of any revocation or suspension of a hackney carriage or private hire driver's licence relating to safeguarding or road safety concerns.
- Search the NR3S register before issuing or renewing any hackney carriage or private hire driver's licence.

This authority, and other licensing authorities, will also be adding historic information on refusals, revocations and suspensions of licences to the register. Historic data will not go back beyond the retention period of 11 years and will not be newly added if more than 11 years have elapsed since the date of the decision. As part of this process, it is intended that the details of the action taken against your previous licence/application will be added to the register in 28 days time. Any relevant data entered onto NR3S which relates to existing licence holders may be considered as part of future renewal processes.

The information recorded on NR3S will be limited to your:

- Licensing authority reference number
- name
- date of birth
- address and contact details
- national insurance number
- driving licence number
- the decision taken, including the length of the suspension, if applicable
- the date of the decision
- the date decision was effective, if different to the date of the decision
- the date of any subsequent change to the decision, and the date it takes effect

Information will be retained on NR3S for 11 years.

Where an applicant's details are flagged on NR3S during a search, this will be followed up separately between the authorities.

The legal basis for processing this information is that it is necessary for the performance of a task carried out in the public interest or in the exercise of official vested in the licensing authority. The purpose is to assess whether an individual is a fit and proper person to hold a hackney carriage or private hire driver's licence. All data processing and sharing will comply with the Data Protection Act (DPA) and the General Data Protection Regulation (UK GDPR). It is not intended that any NR3S data will be transferred out of the United Kingdom.

You have various rights in relation to your data: the right to request access to your data; the right to rectification or erasure of your data; the right to restrict processing of your data, and the right to object to the processing of your data for this purpose. The authority will consider any such requests and respond within 20 working days.

If you wish to raise any issue related to data protection legislation, including relying on any of the rights afforded to data subjects under the UK GDPR, you can do so to the authority's Data Protection Officer at [infogov@solihull.gov.uk](mailto:infogov@solihull.gov.uk) This includes submitting a subject access request.

You always have the right to make a complaint to the Information Commissioner's Office.

Yours sincerely

A handwritten signature in black ink, appearing to read 'Annie Bettison', with a small flourish at the end.

Annie Bettison  
Licensing authority

## Annex B

### Notification to licence holders or applicants whose details will be entered onto NR3S

Dear XXXXXX

#### LOCAL GOVERNMENT (MISCELLANEOUS PROVISIONS) ACT 1976, SECTION 61

NOTICE OF <Revocation/Refusal/Suspension> OF HACKNEY CARRIAGE/PRIVATE HIRE DRIVER'S LICENCE

To:

Of:

Notice is hereby given that Solihull Metropolitan Borough Council, the Licensing Authority for the purposes of section 61 of the Local Government (Miscellaneous Provisions) Act 1976, has today <Revocation/Refusal/Suspension> your <hackney/Private Hire> driver's licence, number X for the period from DD/MM/YYYY to DD/MM/YYYY having regard to the statutory ground(s) and reason(s) indicated below:

(a) that you have since the grant of the licence-

(i) been convicted of an offence involving dishonesty, indecency or violence; or

(ii) been convicted of an offence under or failed to comply with the provisions of the Town Police Clauses Act 1847 or of Part II of the Local Government (Miscellaneous Provisions) Act 1976; or

(b) any other reasonable cause.

by reason of: <enter other reasonable cause details>

\*Delete if not required\* Notice is further given that in accordance with the said section 61 and supplementary provisions contained in section 61 (2B) of the Local Government (Miscellaneous Provisions) Act 1976, I am satisfied that it is both proportionate and in the interests of public safety to require the <Revocation/Refusal/Suspension> of your driver's licence to take immediate effect until DD/MM/YYYY.

The effect of this decision notice (and for the reasons shown above) is that you cannot lawfully continue to drive a licensed vehicle pending the outcome of any appeal to the Magistrates' Court.

You are required, in accordance with section 61(2)(a) of the Local Government (Miscellaneous Provisions) Act 1976, to return your driver badge number X to the Licensing Office at the <Licensing Authority address> Choose an item. Failure to do so is a criminal offence.

In accordance with Section 2 of the Taxis and Private Hire Vehicles (Safeguarding and Road Safety) Act 2022 we have a duty to record information about licensing decisions. This decision will be recorded on the National Register of Taxi Licence Refusals, Revocations, and Suspensions Register (NR3S).



Dated:

A handwritten signature in black ink, appearing to read 'Annie Bettison', with a small comma at the end.

Annie Bettison

Licensing Manager

#### RIGHT OF APPEAL

Section 61 (3) of the Local Government (Miscellaneous Provisions) Act 1976 provides that any person aggrieved by the decision of a local authority to suspend, revoke or refuse to renew a driver licence may appeal to Birmingham Magistrates' Court. The appeal must be submitted in the prescribed form to the Court within 21 days of the date of service of this notice. Please take this email with you to the courts.

You may also wish to obtain your own independent legal advice in relation to such proceedings. Should you decide to exercise your right of appeal against this decision, the Council will defend such proceedings. Should the Council successfully defend the proceedings, it will apply to the court for an order that you pay the cost incurred in defending those proceedings, which may be up to or in excess of £1500.

## Annex C

### Example Information Disclosure Template

This form should be submitted to the relevant licensing authority following a match when searching the National Register of Refusals, Revocations and Suspensions (NR3S).

#### Section A (For completion by requesting authority)

Name of licensing authority requesting information	Solihull Metropolitan Borough Council
Requesting authority reference number	
Name of licensing authority from which information is sought	
Name of individual in respect of whom the request is made	
Decision in respect of which the request is made:	
Refusal/ Revocation/Suspension	
Other details for this record	
Subject address	
Subject driving licence number	
National Insurance Number	
Reference Number from NR3S	

Declaration by requesting licensing authority:

The licensing authority hereby confirms that this information is being sought in connection with the exercising of its statutory function to ensure that holders of taxi / PHV licences are 'fit and proper' persons, and that the processing of this data is therefore necessary in the performance of a task carried out in the public interest.

The information you provide below will only be processed, used and saved by my licensing authority in connection with this particular application and in accordance with all relevant data and privacy requirements, as previously advised by the licensing authority to applicants for and existing holders of taxi and PHV licences, and will be retained in accordance with the licensing authority's retention policy relating to the provision of such information.

To enable your licensing authority to conduct a data protection impact assessment, details of my licensing authority's policy in relation to the use of information obtained as a result of this request is attached to this document/can be accessed at [Data Protection | solihull.gov.uk](https://www.solihull.gov.uk/Data-Protection)

Signed:

Name:

Position:

Date:

**Section B (For completion by providing authority)**

Further information to support the decision recorded on NR3S Register in respect of the above named individual:

**Declaration by providing authority**

The licensing authority hereby confirms that it has conducted a data protection impact assessment.

It also confirms that the information above is accurate, and has been provided after thorough consideration by the licensing authority as to the proportionality and lawfulness of making this disclosure. The information reflects the basis on which the decision recorded in NR3S was made. In the event that the authority becomes aware that this information is no longer accurate, we will advise the above named authority accordingly.

The authority also confirms that, as part of the basis for securing, retaining or applying for a hackney carriage/private hire driver's licence, the above named individual has been made aware of the fact that this information will be shared, in accordance with all relevant data and privacy requirements

Signed:

Name:

Position:

Date:

## **Frequently asked questions**

### **What is the National Register of Taxi Licence Refusals, Revocations, and Suspensions?**

The National Register of Taxi Licence Refusals, Revocations, and Suspensions Register (or the NR3S Register, for short) is a register of information about times when a licensing authority has refused, suspended, chosen not to renew, or revoked a taxi or PHV driver's licence, based wholly or in part on information about the driver regarding safeguarding or road safety.

### **Who runs the Register?**

The Register is run by the National Anti-Fraud Network Data and Intelligence Services ("NAFN"). NAFN is a not for profit, unincorporated body formed by its members to provide services which support their work in the protection of the public interest. NAFN staff are employees of Tameside Metropolitan Borough Council ("Tameside").

### **What is the legal basis for the Register?**

The legal basis for the Register is the Taxis and Private Hire Vehicles (Safeguarding and Road Safety) Act 2022. Section 4 of the 2022 Act provides for the existence of the Register and gives the Secretary of State power to designate a person to run it. NAFN has been designated under this section.

### **Who actually runs the Register?**

The work of running and maintaining the Register is carried out by Tameside, which works closely with NAFN.

### **Did the Register exist before the 2022 Act?**

Yes. The Register was set up on a voluntary basis in 2018, and was run by NAFN and Tameside on behalf of licensing authorities. The 2022 Act puts the Register on a statutory footing.

The Register was originally known as the National Register of Taxi Licence Revocations and Refusals (or the NR3 Register). It has been enhanced to meet the requirements of the 2022 Act, and rebranded as the National Register of Taxi Licence Refusals, Revocations, and Suspensions (or the NR3S Register).

### **Which authorities can use the Register?**

The 2022 Act says that the following can search the database, make entries in it, and amend, remove and reinstate entries that they have made:

- Licensing authorities;
- Relevant authorities;
- The Department for Infrastructure in Northern Ireland.

“Licensing authorities” means public authorities in England which have licensing functions under any of the following:

- sections 37 to 68 of the Town Police Clauses Act 1847
- the Metropolitan Public Carriage Act 1869;
- the Plymouth City Council Act 1975;
- Part 2 of the Local Government (Miscellaneous Provisions) Act 1976;
- section 13 of the Private Hire Vehicles (London) Act 1998.

“Relevant authorities” means:

- a district council in Wales;
- a licensing authority within the meaning of section 2 of the Civic Government (Scotland) Act 1982.

### **Who adds information to the Register?**

Information is added by the authorities listed above.

When a licensing authority decides to do any of the following, based on certain specified information about safeguarding or road safety:

- to refuse a person's application for a driver's licence;
- to refuse a person's application for the renewal of a driver's licence;
- to suspend a person's driver's licence;
- to revoke a person's driver's licence.

it must add information to the Register about its decision.

### **What information does the licensing authority have to add to the Register?**

The licensing authority must add the following information about the person whose licence it has refused, suspended or revoked:

- (a) the person's full name, date of birth, home address and national insurance number;
- (b) if the person holds a licence to drive a motor vehicle granted under Part 3 of the Road Traffic Act 1988, the driver number shown on the licence;
- (c) if the person holds a Northern Ireland driving licence, the driver number shown on the licence;
- (d) if the person holds a Community licence, the number of the licence;

(e) the name of the licensing authority and details of how further information about the decision can be obtained from the authority;

(f) the date on which the decision was made and (if different) the date on which it takes effect;

(g) the date on which any subsequent change to the decision was made and (if different) the date on which it takes effect;

(h) if the decision is to suspend the person's driver's licence for a period, the date on which the suspension is to end;

(i) any other information that the Secretary of State prescribes by regulations.

### **Who has to check the Register?**

Before making a decision on a person's application for a taxi or PHV licence (or for renewal of such a licence), a licensing authority must check the Register for entries about that person. If there is an entry:

- the licensing authority must write to the authority that made the entry, asking for the relevant information on which the recording authority based its decision about the person; and
- the authority that made the entry must provide it with that information.

### **Will I automatically be refused a taxi or private hire vehicle licence if there is information about me on the Register?**

No. Licensing authorities are legally required to consider each taxi and PHV driver licence application on its own merits, and cannot refuse an application simply because an applicant is recorded on the NR3S Register.

The purpose of the Register is to ensure that authorities have the full information necessary to help them reach a decision on whether an individual is 'fit and proper' to have a licence. For instance, if circumstances have materially changed since the decision that has been recorded on the Register, it may be appropriate for another authority to award the same individual a licence.

### **Can the information on the Register be used for any purposes other than those referred to above?**

The 2022 Act says that the person running the Register must make sure that the information in the Register is disclosed only for:

- the safeguarding of passengers; and
- road safety.

### **Can members of the public consult the Register?**

No. This is because of what the 2022 Act says about the purposes for which the information in the Register can be disclosed.

## **Do licensing authorities share information with each other directly as well as via the Register?**

Yes. The 2022 Act deals with a situation where an English licensing authority becomes aware of certain specified information about safeguarding or road safety, regarding a taxi or PHV driver who has driven in its area relying on a licence granted by another authority.

In some circumstances, the authority that becomes aware of that information must share it with the authority that granted the licence.

The latter authority must then consider whether to suspend or revoke the driver's taxi or PVH licence.

## **How do I find out if information about me is held on the Register?**

Under the data protection legislation, you can make a "subject access request" to NAFN or to any authority that you think may have put information about you on the Register, asking to see the information about you that is held on the Register.

## **How long is information kept on the Register?**

The 2022 Act says that an entry on the Register should be kept for 11 years from the time when it was first made.

## **Is the Register governed by data protection law?**

Yes. The relevant law is set out in the UK General Data Protection Regulation ("UK GDPR") and the Data Protection Act 2018 ("DPA 2018"). These apply in relation to the personal data that is held on the Register. UK GDPR and DPA 2018 impose obligations on:

- NAFN;
- The authorities that provide information to the Register, and consult it; and
- Tameside.

NAFN and the authorities are "joint controllers" of the information contained in entries on the Register. Authorities that consult the Register are "controllers" in relation to their access to and use of the data they consult. Tameside is a "processor", operating the Register so that the authorities can add information to it and consult it.

## **Can I find out more about how licensing authorities comply with data protection legislation as regards the Register?**

Yes. Under the UK GDPR, controllers of personal data must provide certain specified information about how they process this information. This is often referred to as a "privacy notice". You should be able to see the relevant privacy notice on the website of each licensing authority.

## **Can I find out more about how NAFN complies with data protection legislation as regards the Register?**

Yes. NAFN's privacy notice for the Register is here: [Privacy Policy - National Anti Fraud Network \(nafn.gov.uk\)](https://nafn.gov.uk/privacy-policy)