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Head of NFI
Cabinet Office
FEDG Team
4th Floor
1 Horse Guards Road

11th March, 2021

To:

Head of the National Fraud Initiative Team

We are migrants' rights organisations and privacy advocates writing to request that the deadline for the Government's open consultation on the expansion of the National Fraud Initiative (NFI) Data Matching Powers and the new Code of Data Matching Practice be extended until May 2021. We believe that the proposal as it currently stands is likely to negatively impact the data protection rights of groups that are particularly vulnerable such as migrants.

We express concerns specifically regarding:

- The lack of sufficient safeguards

- The volume of data being shared about migrants that could lead to abusive behaviour from authorities
- The extension of the powers for crime and offenders, expanding the capacity of police to collate information from public and private bodies

Given the expanded scope of these powers, 6 weeks of consultation is still far too short to provide for different stakeholders to respond. It is also notable that up until now the consultation has been entirely within Government departments and partners to the existing initiative.

Therefore we are requesting you to kindly extend the deadline for a further 6 weeks to allow us sufficient time to investigate the impact of these proposed measures and provide considered feedback.

This extension is necessary if there is to be a proper consultation on this issue especially as previous similar initiatives that were proposed by the Government were not accepted by both Parliament and public opinion.

We await your response.

Signed (in alphabetical order),

Donate4Refugees

Joint Council for the Welfare of Immigrants

Kanlungan Filipino Consortium

Migrants' Rights Network

Open Rights Group

Positive Action in Housing

Privacy International

Refugee and Asylum Participatory Action Research