

Local Data Privacy Policy



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1. Introduction

- 1.1 At Citizens Advice we collect and use your personal information to help solve your problems, improve our services and tackle wider issues in society that affect people’s lives.
- 1.2 We only ask for the information we need. We always let you decide what you’re comfortable telling us, explain why we need it and treat it as confidential.
- 1.3 When we record and use your personal information we:
 - only access it when we have a good reason
 - only share what is necessary and relevant
 - don’t sell it to anyone
- 1.4 We collect and use the details you give us so we can help you. We have a ‘legitimate interest’ to do this under data protection law. This means it lets us carry out our aims and goals as an organisation. We’ll always explain how we use your information.

Coronavirus: Test and Trace if you get advice in person

If you get advice in person we'll ask for your:

- name
- email address or telephone number

We'll keep this information in our secure case management system.

We might be asked to share your name, contact details and the date of your visit with Test and Trace or local public health organisations. This is to help track cases of coronavirus. They might contact you if they think you're at risk after your visit. For example because someone getting advice at the same time has tested positive for coronavirus. You can find out more about [Test and Trace in England](#) on GOV.UK or [Test and Trace in Wales](#) on GOV.WALES.

We'll never share information about the reason for your visit.

If you can't give contact details, for example if it's not safe for you to do so, we'll still be able to give you advice in person.

Unlike most situations, we won't ask for your consent before we share your contact details. If you don't want us to share this information you can tell us you want to opt out.

We're doing this to help keep you and the public safe, this is a 'legitimate interest' of Citizens Advice.

We won't share your contact details with anyone other than Test and Trace or a local public health organisation.

If we share your information we'll let you know, and offer further support.

If you want to know more about changes to our face to face services or how your information will be used, please ask us.

- 1.5 At times we might use or share your information without your permission. If we do, we'll always make sure there's a legal basis for it. This could include situations where we have to use or share your information:
- to comply with the law - for example, if a court orders us to share information. This is called 'legal obligation'
 - to protect someone's life - for example, sharing information with a paramedic if a client was unwell at our office. This is called 'vital interests'
 - to carry out our legitimate aims and goals as a charity - for example, to create statistics for our national research. This is called 'legitimate interests'
 - for us to carry out a task where we're meeting the aims of a public body in the public interest - for example, delivering a government or local authority service. This is called 'public task'
 - to carry out a contract we have with you - for example, if you're an employee we might need to store your bank details so we can pay you. This is called 'contract'
 - to defend our legal rights - for example, sharing information with our legal advisors if there was a complaint that we gave the wrong advice
- 1.6 We handle and store your personal information in line with the law - including the UK General Data Protection Regulation and the Data Protection Act 2018.
- 1.7 You can check our [main Citizens Advice policy](#) for how we handle most of your personal

information. This document covers how we, as Citizens Advice Guildford and Ash (CAGA), handle your information locally in our offices.

2. How Citizens Advice Guildford and Ash will collect and use your data

2.1 In addition to the methods of collection set out in the [main Citizens Advice policy](#), we may also collect and use your information through the following methods.

Citizens Advice Guildford and Ash website

2.2 If you contact us for support through our website we will ask you a series of questions to gather information about you.

- Your name, address, date of birth, gender and contact details and preferences – we collect this information to be able to provide you with advice and support and we process it on the basis of 'legitimate interest', as without it we would not be able to help you.
- Information about the situation you are looking for help with – we collect this information to be able to provide you with advice and support and we process it on the basis of 'legitimate interest'. If this includes special category data (for example, health) we will process this information on the basis of 'explicit consent' (see below).
- Information about your household type, status, employment, nationality and first language – there are two reasons we collect this information. Firstly, to be able to help you with your query, where relevant and we process this information on the basis of 'legitimate interest'. Secondly, we use this information in a completely anonymised way to be able to analysis the profile of our clients to identify trends and look at how we can better support clients or campaign for change to help clients. Your personal details are not identifiable in any way from this analysis.
- Information about your ethnicity and health – there are two reasons we collect this information. Firstly, to be able to help you with your query, where relevant and we process this information on the basis of 'explicit consent' and we will only record this information if we have your consent to do so. Secondly, as above, we use this information in a completely anonymised way to analyse trends and look at how we can better support clients. Again, your personal details are not identifiable in any way from this analysis.
- Your consent if you are happy to be contacted after your experience to give feedback on what you thought of our service.

Emails to Adviceline

2.3 If you provide information by email to our email address: adviceline@ca-ga.org.uk we will collect and use this data to be able to help you with your query. We will process this information on the basis of 'legitimate interest'. If you provide any special category data to this email address, we will process this information on the basis of 'explicit consent' and will therefore ask you for this consent before we process it.

Sending an SMS (text) through TextAnywhere

2.4 If you have given us consent to contact you by text we may do this through third party software, currently TextAnywhere. The text message will be sent through their encrypted website which has secure access. The only information which will be processed through the software if your phone number and the content of the message. We will process this information on the basis of 'legitimate interest'. You can access more information about how TextAnywhere will manage this

date [here](#). If we need to send any special category data by text, we will process this information on the basis of 'explicit consent' and will therefore ask you for this consent before we process it.

Referrals made by third-parties

- 2.5 If you have been referred to us by a third-party organisation for support from one of our specialist projects, for example, our Macmillan Welfare Benefits Service, the organisation referring you will have discussed the referral with you before they send your details to us.
- 2.6 They will provide enough information to us to for us to be able to accept the referral and make initial contact with you. We will process this information on the basis of 'legitimate interest' as we need it to be able to make contact with you.
- 2.7 When we make the first contact, we will then ask you for 'explicit consent' for us to record any special category data (including health and ethnicity) as well as consent to be contacted for feedback about experience of our service, consent for any referrals we may make to other organisations and also your authority for us to act on your behalf where appropriate.
- 2.8 Any information you provide either directly in person or on the phone, or by email or in a voicemail will be processed as outlined above.

3. Working on your behalf

- 3.1 When you give us authority to act on your behalf, for example to help you with a Universal Credit claim, we'll need to share information with that third party.
- 3.2 The organisations we would normally contact on your behalf include:
 - local authorities, for example, Guildford Borough Council and Surrey County Council
 - The Department for Works and Pensions (DWP)
 - HM Revenues and Customs (HMRC)
 - Utility companies
 - Other companies you may owe money to, for example, credit card companies
 - Support organisations, for example, Age UK or Guildford Action
- 3.3 We will only act on your behalf with your consent.

4. How Citizens Advice Guildford and Ash will store your information

- 4.1 We will store your information on Casebook which is the Citizens Advice National case management system. You can read more about how we will store information on Casebook in the [main Citizens Advice policy](#),
- 4.2 We will also store your information electronically in Microsoft 365 which is a cloud-based storage system. This information is stored securely to the required standard.
- 4.3 We may also store information on paper which will be kept in locked filing cabinets/cupboards.

5. How Citizens Advice Guildford and Ash will share your information

- 5.1 We will only share your information with another organisation where we have your consent to do

so, or in the situations outlined in section 1.5. This will normally be when we are acting on your behalf with the organisations listed under 3.2 or making a referral to another organisation who will then provide you with support directly. Some examples include:

- **Foodbank** – We may share your name and address with the provider to allow you to access their service. Your adviser will ask for your permission to do this.
- **Health or care provider** – We may share an anonymised report of your experience with [HealthWatch Surrey](#). This means you cannot be identified and helps their work to protect people who use the health and care services. Your adviser will ask for your consent to do this.
- **Free legal advice service** – We will share your name, address and details of your case. Your adviser will ask for your consent to do this.

Reporting statistical information

5.2 We may use your information to provide reports and statistical information about our services to our funders and other organisations we work with, like Guildford Borough Council and health authorities. **This information will be anonymous** and will be the number of clients we have seen, the issue we helped them with and some demographic information such as age, ethnicity and disability.

6. Contacting Citizens Advice Guildford and Ash about your information

6.1 If you have any questions about how your information is collected or used, you can contact our office on 08082 787 888 or by email to adviceline@ca-ga.org.uk

6.2 You can contact us to:

- find out what personal information we hold about you;
- correct your information if it's wrong, out of date or incomplete;
- request we delete your information;
- ask us to limit what we do with your data - for example, ask us not to share it if you haven't asked us already;
- ask us to give you a copy of the data we hold in a format you can use to transfer it to another service; or
- ask us to stop using your information.

7. Who's responsible for looking after your personal information

7.1 The national Citizens Advice charity and Citizens Advice Guildford and Ash operate a system called Casebook to keep your personal information safe. This means they're a 'joint data controller' for your personal information that's stored in our Casebook system.

7.2 Citizens Advice Guildford and Ash is an independent charity, and a member of the national Citizens Advice charity. The Citizens Advice membership agreement also requires that the use of your information complies with data protection law.

7.3 You can [find out more about your data rights on the Information Commissioner's website](#).