

Citizens Advice Canterbury District Privacy Policy

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March 2025 by Citizens Advice Canterbury District

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March 2027 by Canterbury District

Citizens Advice Canterbury District Privacy Policy

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.

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.

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

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.

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

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.

You can check our [main Citizens Advice policy](#) for how we handle most of your personal information.

This page covers how we, as your local charity, handle your information locally in our offices.

See table at bottom of this document to see legal basis we rely on to process Special Category Data and criminal offence data.

How Citizens Advice Canterbury District collect your data

In addition to the general rules see our national Citizens Advice privacy policy covered by the main Citizens Advice policy, Canterbury District Citizens Advice asked for the additional information:

If you require advice from our Macmillan Welfare Benefits Service

We will collect your data over the telephone, during face to face interviews, from e-mails you send us, from secure emails or referral forms sent to us by other agencies like the local hospital trust.

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 obtain feedback for Macmillan to monitor the quality of our service to you This is called 'legitimate interests'
- to defend our legal rights - for example, sharing information with our legal advisors if there was a complaint that we gave the wrong advice

Recruitment

If you apply for a job or to be a volunteer including a trustee:

We will collect your data through a paper or e-mailed application form or gather information from the on-line application form provided by Citizens Advice if you have applied via the national Citizens Advice public website.

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 volunteer or staff member was unwell at our office. This is called 'vital interests'
- to carry out our legitimate aims and goals as a charity or a company- for example, to enter Trustee's details with the Charity Commission's Register. 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 staff information with our legal advisors in event of an employment tribunal

Friends

If you are a Friend of Canterbury District Citizens Advice we will ask you to complete an application form either on paper or sent by email. We will use Legitimate Interest for us to store and use this data.

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 someone was unwell at one of our events. This is called 'vital interests'
- to carry out our legitimate aims and goals as a charity - for example, to claim gift aid from HMRC.. This is called 'legitimate interests'
- to defend our legal rights - for example, sharing information with our legal advisors if there was a tax investigation

If you are referred for our Money and Mental Health Advice Service We will collect your data over the telephone, during face to face interviews, from emails you send us, from secure emails or referral forms sent to us by other agencies like Citizens Advice NW Kent or a Mental Health Professional.

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 obtain feedback for Macmillan to monitor the quality of our service to you This is called 'legitimate interests'
- to defend our legal rights - for example, sharing information with our legal advisors if there was a complaint that we gave the wrong advice

What Citizens Advice Canterbury District ask for

For advice clients, including for our Macmillan and Money and Mental Health Advice Service:

To find out what information we ask for, see our national Citizens Advice privacy policy see our national Citizens Advice privacy policy [main Citizens Advice policy](#)

For our Macmillan clients, in addition to the information asked of General Advice clients, we will ask for details of your cancer diagnosis and prognosis, and contact details of your Clinical Nurse Specialist or Consultant.

If you are referred to the Pro Bono Family Legal Rota run by Canterbury District Citizens Advice in addition to the general information relevant to your case we will ask for the name and address and date of birth of any third party relevant to your case.

For staff and volunteer applications we ask for personal details such as name and address and some special category data such as gender, ethnicity, nationality, religion and sexual orientation

For Friends of Canterbury District Citizens Advice we will ask details such as your name, address, e-mail, telephone number, bank details and tax status.

For our Money and Mental Health Advice Service in addition to the information asked of General Advice clients, we will ask for details of your Mental Health condition and how it affects your day to day living.

How Citizens Advice Canterbury District use your information

To find out how we use your information, see our national Citizens Advice privacy policy' [main Citizens Advice policy](#)

In addition see the information specific to the Citizens Advice Canterbury District:

For Macmillan Welfare Benefits clients in addition to the general advice provisions we may also share your data with Macmillan Cancer Support if we refer you for a Macmillan Grant, or if they need to address a complaint from you about our service, and we may share anonymous data for research and policy issues. We will rely on our 'legitimate interest' in delivering benefits advice as a charity funded by Macmillan to do this. For grant referrals we will ask your permission to do this.

If you are referred to the Pro Bono Family Legal Rota run by Canterbury District Citizens Advice we will send a copy of your case details, including contact details to the Pro Bono solicitors firm or barristers chambers who will be delivering the advice. They will use this to prepare for your case and to check no conflict of interest arises. We will get your permission to share these details.

If you apply to be a volunteer or employee we will use your information to assess and select you for voluntary/paid positions (whichever is relevant), for training purposes, to monitor the equality characteristics of our workforce or to process wage, pension, tax and National Insurance payments (where relevant).

If you are a Friend of Canterbury District Citizens Advice we will use your information to contact you to give you news about Canterbury District Citizens Advice and about our fundraising events. We will not sell your information to other organisations. We will use it to collect gift aid from HMRC if you have agreed to this.

Working on your behalf

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, for example, with the Jobcentre.

For Macmillan Welfare Benefits clients in addition to the general advice provisions we may share your data with Macmillan Cancer Support if we refer you for a Macmillan Grant, or if they need to address a complaint from you about our service, and we may share anonymous data for research and policy issues. For Macmillan Grant referral we will ask for your permission to do so. We other Macmillan work will rely on our 'legitimate interest' in delivering benefits advice as a charity funded by Macmillan to do this.

If you are referred to the Pro Bono Family Legal Rota run by Canterbury District Citizens Advice we will send a copy of your case details, including contact details to the Pro Bono solicitors firm or barristers chambers who will be delivering the advice. They will use this to prepare for your case and to check no conflict of interest arises. We will get your permission to share these details on referral.

If you apply to be a volunteer or employee we will use your information to assess and select you for voluntary/paid positions (whichever is relevant), for training purposes, to monitor the equality characteristics of our workforce or to process wage, pension, tax and National Insurance payments (where relevant).

If you are a Friend of Canterbury District Citizens Advice we will use your information to contact you to give you news about Canterbury District Citizens Advice and about our fundraising events. We will not sell your information to other organisations. We will use it to collect gift aid from HMRC if you have agreed to this.

How Citizens Advice Canterbury District store your information

To find out how we store your information, see our national Citizens Advice privacy policy'

Locally we may store information on paper (e.g. on client permission forms or on copies of your paperwork), in our google suite (encrypted) accounts, such as calendars, emails or referral lists, in the 'Refernet' on-line referral system if you have been referred to or from another local organisation via this system, or on the CLOCK Participant Administrative System if referred by the Christchurch Legal Companions Scheme CLOCK. Limited data is also stored on computers within the office whilst we are working on your documents and will be deleted once dealt with as documents are stored on the Citizens Advice national Casebook system see our national Citizens Advice privacy policy'. Documents may also be stored temporarily on our photocopiers or scanners, these are regularly routinely cleared and are securely destroyed at end of use.

How Citizens Advice Canterbury District share your information

For Macmillan or Pro Bono Legal Rota clients If we share information with Macmillan or your medical contacts under the Macmillan Welfare Benefits Service or with local pro bono solicitors for the family legal rota we will share any personally identifiable data via encrypted word attachments to email. We will get your permission either written or verbal before we share personal data with these organisations.

We might also occasionally share client information with other agencies to whom you are being referred or who we are working with on the case but this will always be with your permission. Any case studies will be anonymised.

Contact Citizens Advice Canterbury District about your information

If you have any questions about how your information is collected or used, you can contact our office.

The Chief Officer

Telephone: 01227 364725, open Monday to Friday 9am-5pm

Email: distman@canterburycab.cabnet.org.uk.

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
- ask us stop using your information

Who's responsible for looking after your personal information

The national Citizens Advice charity and your local Citizens Advice 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.

Each local Citizens Advice 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.

You can find out more about your data rights on the Information Commissioner’s website.

These are the lawful basis we rely upon when processing data:

Purpose	Personal data (UK GDPR Article 6 requirement)	Special category and criminal offence data (UK GDPR Article 9 or 10 requirement)
Advice, information and guidance provision	<p>Article 6(1)(f) - Legitimate interests Where processing is not based on any public function. We have carried out a Legitimate Interests Assessment for this processing.</p>	<p>Article 9(2)(f) - establishment, exercise or defence of legal claims Where the processing relates to the establishment or defence of legal claims including legal rights including but not limited to those such as those in relation to benefits, debt, energy and housing. For criminal offence data the same provision is outlined in Data Protection Act 2018, Schedule 1, Part 3 (33).</p> <p>Article 9(2)(g) - substantial public interest (confidential counselling, advice or support) Where our advice, information or guidance relates to confidential wellbeing support. For example if supporting a client with issues relating to loneliness. The specific substantial public interest condition we rely on is in Data Protection Act 2018,</p>

Purpose	Personal data (UK GDPR Article 6 requirement)	Special category and criminal offence data (UK GDPR Article 9 or 10 requirement)
		Schedule 1, (17) 'Counselling etc'. This condition also applies to special category data and criminal offence data.
EDI monitoring	Article 6(1)(f) - Legitimate interests We have a legitimate interest in processing EDI data to ensure we are promoting equity and diversity in our service. We have a full legitimate interest assessment for this processing.	Article 9(2)(g) - substantial public interest Processing of information relating to race or ethnicity, religious or philosophical beliefs, health (including disability), and sexual orientation for the purpose of enabling, promoting or maintaining equality of treatment. Specifically we rely on is in the Data Protection Act 2018, Schedule 1, (8) 'equality of opportunity or treatment'. This substantial public interest category only applies to specific SCD criteria listed above and does not extend to criminal offence data. However criminal offence data is not processed for EDI monitoring.
Accessibility and reasonable adjustments	Article 6(1)(c) - Legal obligation We have legal obligations in accordance with the Equality Act 2010.	Article 9(2)(g) - substantial public interest Specifically we rely on Data Protection Act 2018, Schedule 1, (6) 'statutory and governmental purposes' in accordance with the Equality Act 2010. This will only apply to special category data and will not extend to criminal offence data but such data is not processed for this purpose.

Purpose	Personal data (UK GDPR Article 6 requirement)	Special category and criminal offence data (UK GDPR Article 9 or 10 requirement)
Statistical purposes and research (including feedback)	<p>Article 6(1)(f) - Legitimate interests We have a legitimate interest to carry out statistical analysis and research using our client data. We have carried out a legitimate interest assessment for statistical processing, research and policy formation. We may also keep pseudonymised data for archival purposes.</p>	<p>Article 9(2)(j) Archiving, research and statistics As per the A6 condition.</p>
Publication of client stories	<p>Article 6(1)(a) - Consent Where we seek to publish client stories in an identifiable format, we will always get client consent. Clients will always be given a genuinely free and fair choice.</p>	<p>Article 8(a)(a) - Explicit Consent As per the A6 condition.</p>
Maintaining quality and standards	<p>Article 6(1)(f) - Legitimate interests We have a legitimate interest as an organisation to ensure that we are meeting appropriate quality and standards in our advice to clients.</p>	<p>Article 9(2)(f) - establishment, exercise or defence of legal claims Citizens Advice needs to be able to provide evidence that certain standards and quality measures are being met so as to defend against claims of malpractice or negligence.</p> <p>Article 9(2)(g) - substantial public interest</p>

Purpose	Personal data (UK GDPR Article 6 requirement)	Special category and criminal offence data (UK GDPR Article 9 or 10 requirement)
		<p>Specifically we rely on is in Data Protection Act 2018, Schedule 1, (11) Protecting the public against dishonesty etc where we are carrying out functions to protect against:</p> <ul style="list-style-type: none"> • dishonesty, malpractice or other seriously improper conduct • unfitness or incompetence, • mismanagement in administration
Complaints	<p>Article 6(1)(f) - Legitimate interests We have a legitimate interest to investigate complaints and to implement lessons learned from them.</p>	<p>Article 9(2)(f) - establishment, exercise or defence of legal claims Citizens Advice needs to be able to investigate complaints to defend against claims of malpractice or negligence.</p> <p>Article 9(2)(g) - substantial public interest Specifically we rely on is in Data Protection Act 2018, Schedule 1, (11) Protecting the public against dishonesty etc where we are investigating complaints in order to protect against:</p> <ul style="list-style-type: none"> • dishonesty, malpractice or other seriously improper conduct • unfitness or incompetence, • mismanagement in administration

Purpose	Personal data (UK GDPR Article 6 requirement)	Special category and criminal offence data (UK GDPR Article 9 or 10 requirement)
Legal claims	Article 6(1)(f) - Legitimate interests We have a legitimate interest in defending our organisation against legal claims.	Article 9(2)(f) - establishment, exercise or defence of legal claims We need to be able to adequately defend our organisation against legal claims.
Individual rights requests	Article 6(1)(c) - Legal obligation We have a legal obligation to carry our individual rights requests in accordance with data protection law.	Article 9(2)(g) - substantial public interest Specifically we rely on is Data Protection Act 2018, Schedule 1 (6) 'statutory and governmental purposes' to comply with the UK GDPR and Data Protection Act 2018.
Safeguarding	Article 6(1)(e) - Public task The legislation covering safeguarding is the Care Act 2014 (England) and the Social Services and Wellbeing (Wales) Act 2014. These acts put duties on local authorities in relation to adult safeguarding and while they don't apply to us directly as a charity, we acknowledge Citizens Advice may receive their funding or are contracted to deliver services on their behalf and therefore it's essential that we understand and perform our role in protecting adults at risk.	Article 9(2)(g) - substantial public interest This condition is met when the processing is necessary for the safeguarding of children and of individuals at risk in accordance with Data Protection Act 2018, Schedule 1, (18) 'Safeguarding of children and of individuals at risk'

Purpose	Personal data (UK GDPR Article 6 requirement)	Special category and criminal offence data (UK GDPR Article 9 or 10 requirement)
Fraud prevention	<p>Article 6(1)(f) - Legitimate interests We have a legitimate interest in defending against fraudulent activity.</p> <p>Article 6(1)(c) - Legal obligation In some circumstances there are legal obligations to disclose actual or suspected cases of fraud.</p>	<p>Article 9(2)(g) - substantial public interest We rely on three separate substantial public interest conditions as follows:</p> <p>Data Protection Act 2018, Schedule 1, (10): 'preventing and detecting unlawful acts' - where we process data to prevent or detect such activity</p> <p>Data Protection Act 2018, Schedule 1, (14) : 'Preventing Fraud' where we disclose fraudulent activity to anti-fraud organisations</p> <p>Data Protection Act 2018, Schedule 1, (15) : 'Suspicion of terrorist financing or money laundering' to comply with certain requirements under Terrorism Act 2000 and Proceeds of Crime Act 2002</p>
Responding to an life threatening emergency	<p>Article 6(1)(d) - Vital interests Where a person's life may be in danger</p>	<p>Article 9(2)(g) - Vital interests Where a person's life may be in danger and use of special category data is necessary.</p> <p>Data Protection Act 2018, Schedule 1, (30): 'Protecting individual's vital interests' also enables criminal offence data for this purpose.</p>