

Citizens Advice Greenwich Privacy Policy

At Citizens Advice Greenwich, 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.

This privacy policy explains how we use your information and what your rights are. We handle and store your personal information in line with data protection law and our confidentiality policy. The following pages tell you more about how we use your information in more detail.

Our network

Citizens Advice is a membership organisation made up of the national Citizens Advice charity and many local offices across England and Wales, including Citizens Advice Greenwich. Citizens Advice Greenwich is an independent charity and a member of the national Citizens Advice charity.

All members of the Citizens Advice network are responsible for keeping your personal information safe and making sure data protection law is followed.

Members of the network also run some jointly designed services and use some of the same systems to process your personal data. In these instances we are joint data controllers for these activities.

Jointly controlled data

All offices in the Citizens Advice network use some joint systems to carry out our activities. These include joint case management systems, telephony platforms and more.

Staff from a different local Citizens Advice can only access your personal information in a joint system if they have a good reason. For example when:

- you go to a different office to seek advice
- more than one office is working together in partnership
- they need to investigate a complaint or incident

We have rules and controls in place to stop people accessing or using your information when they shouldn't.

Tell an adviser if you're worried about your details being on a national system. We'll work with you to take extra steps to protect your information - for example by recording your problem without using your name.

National Citizens Advice has a [privacy notice](#) available on their website that covers general advice and nationally managed systems, including our case management systems. This policy covers the processing we carry out in our office.

How we use your data for advice

This section covers how we use your data to provide you with advice.

For general advice and nationally funded advice programmes please see the national Citizens Advice [privacy notice](#).

How we collect your information

We collect and use information about you to help solve your problems, improve our services and tackle wider issues in society that affect people's lives.

We always let you decide what you're comfortable telling us, explain why we need your information and keep it confidential. When we keep something you tell us, we:

- only access it when we have a good reason
- only share what is necessary and relevant
- don't sell it to commercial organisations

What information we collect

Details relating to your advice issue that are needed for us to progress your advice issue. Your personal contact details, third parties, and issues relating to your advice issue.

What we use your information for

- Advice, information and guidance
- Funder sharing
- EDI monitoring
- Accessibility and reasonable adjustments
- Statistical purposes
- Direct marketing of Citizens Advice Services
- Publication of client stories
- Maintaining quality standards
- Complaints
- Legal claims
- Individual rights and responsibilities
- Safeguarding
- Fraud prevention
- Responding to life threatening circumstances

First and foremost your information will be used to provide you with advice. We also use information in a way that doesn't directly identify you to understand how different problems are affecting society and to take action to tackle these problems. As this is used for research it is kept separate from your case record.

Our confidentiality policy

At Citizens Advice we have a confidentiality policy which states that anything you tell us as part of advice will not be shared outside of the Citizens Advice network unless you provide your permission for us to do so.

There are some exceptions to this such as needing to share:

- to prevent an immediate risk of harm to an individual
- In select circumstances if it is in the best interests of the client
- where we are compelled to do so by law (e.g. a court order or meeting statutory disclosures)
- where there is an overriding public interest such as to prevent harm against someone or to investigate a crime
- to defend against a complaint or legal claim
- to protect our name and reputation for example to provide our side of a story reported in the press

Who we share your information with

Third parties in order to progress your case; partner agencies; occasionally funders, Citizens Advice.

Where will you store my data?

The record of your case will be stored securely in an electronic case management system used jointly by all of the Citizens Advice service. We are all responsible for keeping it safe. As part of solving your problem, we might also make written notes, download copies of your case or send emails containing your information. We will make sure any information is stored securely and only accessed when there's a good reason by staff and volunteers of the Citizens Advice service.

How long do you keep records for?

We keep records for 6 years. We may keep records for 16 years if the advice given could have serious consequences if it was not stored for a longer period.

Our lawful basis for using your information

<p>Advice, information and guidance provision</p>	<p>Article 6(f) - Legitimate interests</p> <p>Where processing is not based on any public function. We have carried out a Legitimate Interests Assessment for this processing.</p> <p>Article 6(e) - Public task</p> <p>Where processing is based on official authority laid down by law or a statutory function. For example in relation to our consumer service functions.</p>	<p>Article 9(2)(f) - establishment, exercise or defence of legal claims</p> <p>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 (statutory)</p> <p>Where our advice, information or guidance relates to a statutory function, such as in our consumer service we rely on Data Protection Act 2018, Schedule 1, (6) 'Statutory etc and government purposes'. This condition also applies to criminal offence data</p> <p>Article 9(2)(g) - substantial public interest (confidential</p>	<p>No, though clients may have the option of being unnamed</p>
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		<p>counselling, advice or support)</p> <p>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, Schedule 1, (17) 'Counselling etc'. This condition also applies to special category data and criminal offence data.</p> <p>NB: there may be locally managed services which could rely on alternative lawful conditions for processing. The IG Team can assist with considerations on a case by case basis.</p>	
Funder sharing	This will be dependent on the purpose the funder is processing data for and will need to	As per A.6 requirement	Case by case depending on purpose the funder is using the data

	<p>be determined on a case by case basis.</p> <p>Check with the funder and the relevant guidance.</p>		for - check with funder
EDI monitoring	<p>Article 6(f) - Legitimate interests</p> <p>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.</p>	<p>Article 9(2)(g) - substantial public interest</p> <p>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.</p>	Yes, clients and witnesses should be given the option of providing this data including 'prefer not to say' options

Accessibility and reasonable adjustments	Article 6(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.	Yes, clients can choose whether they provide this data or not
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<p>Statistical purposes and research (including feedback)</p>	<p>Article 6(f) - Legitimate interests</p> <p>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</p> <p>As per the A6 condition.</p>	<p>Generally not required unless it involves client contact in which case an opt in should be offered</p>
<p>Direct marketing of Citizens Advice Services</p>	<p>Article 6(f) - Legitimate interests</p> <p>We have a legitimate interest to carry out marketing of our services to clients provided the service is in their best interest and we have been transparent and have provided opt outs unless this involves direct electronic marketing.</p> <p>Article 6(a) - Consent</p> <p>If direct electronic marketing is involved we must get the client's consent with a genuinely free and fair choice.</p>	<p>SCD should generally not be processed for this purpose.</p>	<p>Yes, or consent</p>
<p>Publication of client stories</p>	<p>Article 6(a) - Consent</p> <p>Where we seek to publish client stories in</p>	<p>Article 8(a)(a) - Explicit Consent</p> <p>As per the A6 condition.</p>	<p>Consent should be used if clients</p>

	<p>an identifiable format, we will always get client consent. Clients will always be given a genuinely free and fair choice.</p> <p>NB: If fully deidentified a lawful basis is not required for publication itself - care must be taken to ensure they cannot be re-identified.</p>		are identifiable
<p>Maintaining quality and standards</p>	<p>Article 6(f) - Legitimate interests</p> <p>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</p> <p>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> <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, 	No

		<ul style="list-style-type: none"> • mismanagement in administration 	
Complaints	<p>Article 6(f) - Legitimate interests</p> <p>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</p> <p>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</p> <p>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 	No
Legal claims	<p>Article 6(f) - Legitimate interests</p> <p>We have a legitimate interest in defending our organisation against legal claims.</p>	<p>Article 9(2)(f) - establishment, exercise or defence of legal claims</p> <p>We need to be able to adequately defend our organisation against legal claims.</p>	No
Individual rights requests	<p>Article 6(c) - Legal obligation</p>	<p>Article 9(2)(g) - substantial public interest</p>	No

	<p>We have a legal obligation to carry our individual rights requests in accordance with data protection law.</p>	<p>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.</p>	
<p>Safeguarding</p>	<p>Article 6(e) - Public task</p> <p>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 our role in protecting adults at risk.</p>	<p>Article 9(2)(g) - substantial public interest</p> <p>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'</p>	<p>No</p>
<p>Fraud prevention</p>	<p>Article 6(f) - Legitimate interests</p> <p>We have a legitimate interest in defending against fraudulent activity.</p> <p>Article 6(c) - Legal obligation</p>	<p>Article 9(2)(g) - substantial public interest</p> <p>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' -</p>	<p>No</p>

	<p>In some circumstances there are legal obligations to disclose actual or suspected cases of fraud.</p>	<p>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>	
<p>Responding to an life threatening emergency</p>	<p>Article 6(d) - Vital interests</p> <p>Where a person's life may be in danger</p>	<p>Article 9(2)(g) - Vital interests</p> <p>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>	<p>No - should only be used where a person cannot consent to this processing</p>

How we use your data for research, feedback and statistics

This section covers how we use your data to carry out our research, feedback and statistical work..

National Citizens Advice covers their use of data for this purpose in their [privacy notice](#).

How we collect your information

The national Citizens Advice Casebook system and by local survey forms.

What information we collect

All information used for statistical reports and to compile case studies is anonymous.

What we use your information for

To provide statistics and case studies for reports to funders and for annual reports, all data is anonymous.

Who we share your information with

Funders, the public. Everything is anonymous.

Our lawful basis for using your information

Our lawful basis for using your information			
Advice, information and guidance provision	Article 6(f) - Legitimate interests Where processing is not based on any public function. We have carried out a Legitimate Interests Assessment for this processing. Article 6(e) - Public task	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	No, though clients may have the option of being unnamed



		NB: there may be locally managed services which could rely on alternative lawful conditions for processing. The IG Team can assist with considerations on a case by case basis.	
Witness support	<p>Article 6(f) - Legitimate interests</p> <p>We have carried out a Legitimate Interests Assessment for this processing.</p>	<p>Article 9(2)(g) - substantial public interest</p> <p>Collection of SCD or criminal offence data is not usually necessary for this purpose but where it is we rely on the following provisions:</p> <p>For the purpose of administration of justice we rely on Data Protection Act 2018, Schedule 1, (7).</p> <p>Where we are providing emotional or wellbeing support we rely on is in Data Protection Act 2018, Schedule 1, (17) 'Counselling etc'. This condition also applies to criminal offence data.</p>	No
Funder sharing	This will be dependent on the purpose the funder is processing data for and will need to be determined on a case by case basis.	As per A.6 requirement	Case by case depending on purpose the funder is using the data for - check with funder

	Check with the funder and the relevant guidance.		
EDI monitoring	<p>Article 6(f) - Legitimate interests</p> <p>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.</p>	<p>Article 9(2)(g) - substantial public interest</p> <p>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.</p>	Yes, clients and witnesses should be given the option of providing this data including 'prefer not to say' options
Accessibility and reasonable adjustments	<p>Article 6(c) - Legal obligation</p> <p>We have legal obligations in accordance with the Equality Act 2010.</p>	<p>Article 9(2)(g) - substantial public interest</p> <p>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</p>	Yes, clients can choose whether they provide this data or not

		data but such data is not processed for this purpose.	
Statistical purposes and research (including feedback)	<p>Article 6(f) - Legitimate interests</p> <p>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</p> <p>As per the A6 condition.</p>	Generally not required unless it involves client contact in which case an opt in should be offered
Direct marketing of Citizens Advice Services	<p>Article 6(f) - Legitimate interests</p> <p>We have a legitimate interest to carry out marketing of our services to clients provided the service is in their best interest and we have been transparent and have provided opt outs unless this involves direct electronic marketing.</p> <p>Article 6(a) - Consent</p>	SCD should generally not be processed for this purpose.	Yes, or consent

	<p>If direct electronic marketing is involved we must get the client's consent with a genuinely free and fair choice.</p>		
<p>Publication of client stories</p>	<p>Article 6(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>NB: If fully deidentified a lawful basis is not required for publication itself - care must be taken to ensure they cannot be re-identified.</p>	<p>Article 8(a)(a) - Explicit Consent As per the A6 condition.</p>	<p>Consent should be used if clients are identifiable</p>
<p>Maintaining quality and standards</p>	<p>Article 6(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>No</p>



		<p>Article 9(2)(g) - substantial public interest</p> <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	
<p>Complaints</p>	<p>Article 6(f) - Legitimate interests</p> <p>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</p> <p>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</p> <p>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>	<p>No</p>

		<ul style="list-style-type: none"> • dishonesty, malpractice or other seriously improper conduct • unfitness or incompetence, • mismanagement in administration 	
Legal claims	<p>Article 6(f) - Legitimate interests</p> <p>We have a legitimate interest in defending our organisation against legal claims.</p>	<p>Article 9(2)(f) - establishment, exercise or defence of legal claims</p> <p>We need to be able to adequately defend our organisation against legal claims.</p>	No
Individual rights requests	<p>Article 6(c) - Legal obligation</p> <p>We have a legal obligation to carry our individual rights requests in accordance with data protection law.</p>	<p>Article 9(2)(g) - substantial public interest</p> <p>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.</p>	No
Safeguarding	<p>Article 6(e) - Public task</p> <p>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</p>	<p>Article 9(2)(g) - substantial public interest</p> <p>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'</p>	No

	<p>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 our role in protecting adults at risk.</p>		
<p>Fraud prevention</p>	<p>Article 6(f) - Legitimate interests</p> <p>We have a legitimate interest in defending against fraudulent activity.</p> <p>Article 6(c) - Legal obligation</p> <p>In some circumstances there are legal obligations to disclose actual or suspected cases of fraud.</p>	<p>Article 9(2)(g) - substantial public interest</p> <p>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</p>	<p>No</p>

		certain requirements under Terrorism Act 2000 and Proceeds of Crime Act 2002	
Responding to an life threatening emergency	Article 6(d) - Vital interests Where a person's life may be in danger	Article 9(2)(g) - Vital interests Where a person's life may be in danger and use of special category data is necessary. Data Protection Act 2018, Schedule 1, (30): 'Protecting individual's vital interests' also enables criminal offence data for this purpose.	No - should only be used where a person cannot consent to this processing

How we use your data when applying to work or volunteer

How we collect your information

Job application forms; interview records. All EDI monitoring information is kept separate to interview record forms.

What information we collect

Name, address, contact details, details of referees, job history, other information as disclosed on application form, EDI monitoring information.

What we use your information for

To decide whether or not to accept you as a member of staff or volunteer. EDI monitoring.

Who we share your information with

Referees (for references); DBS checks.

Our lawful basis for using your information

Legitimate interests and consent.

How we use your data when using our website

We do not use your data on our websites, all case studies are anonymous.

Your data protection rights

You have rights in relation to your personal data that we hold. Your rights include being able to request:

- Access to copies of your data
- Corrections are made to inaccurate data
- Deletion of your personal data
- Object to how we use your personal data

These rights are not absolute and may not apply in every circumstance. For more information about your rights you can visit the [ICO website](#).

To make a data protection rights request you can do so by emailing woolwich.admin@greenwichcab.org.uk

Raising a concern about how we use your information

If you are concerned about how we have handled your personal information please contact us at woolwich.admin@greenwichcab.org.uk

You can also contact the national charity if you are unhappy with how we have used your personal data or wish to raise a concern about how a local office has handled your personal data. To do so you can email us at DPO@citizensadvice.org.uk

Contacting the Information Commissioner's Office (ICO)

You can also raise your concern with the Information Commissioner's Office which regulates data protection law in the UK. If you are unhappy with how we have used your personal information. They will normally expect you to have made a complaint to us directly in the first instance.

- [Visit the ICO website.](#)
- Address: Information Commissioner's Office, Wycliffe House, Water Lane, Wilmslow, Cheshire SK9 5AF
- Helpline number: 0303 123 1113