

# Citizens Advice Carlisle & Eden - Privacy Policy

At Citizens Advice Carlisle & Eden 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 are 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
- do not 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 will always explain how we use your information.

## How CACE collects your data

You can decide exactly what information you are happy to tell us.

We will use the information because we have a 'legitimate interest' to do so for the purpose of providing you with advice and carrying out research.

When processing Special Category Data such as health conditions, ethnic origin, religion, sexual orientation, and trade union membership, we rely upon the following lawful bases:

- Article 9(2)(f) - establishment, exercise, or defence of legal claims
- Article 9(2)(g) - substantial public interest (statutory)
- Article 9(2)(g) - substantial public interest (counselling)

For further information, please see our [national Citizens Advice policy](#).

## What information CACE collects

To support your enquiry, we collect information about you and your circumstances, such as:

- your name - you can ask to remain unnamed, but this may limit the advice we are able to provide
- contact details such as your address, phone number and email address
- profile information such as your date of birth and whether you have any accessibility requirements

You can choose which information you give us, but not providing certain information may limit the advice we can give you.

We will also collect any information about your issue which could help us provide you with advice which can include:

- information about your finances - for example your income, expenditure, debts, benefits, or pension
- credit reports - we may get copies of your credit history with your permission
- details of the products or services you are having issues with
- details of your housing such as your rent, mortgage, and housing conditions
- information about your health or disability
- details of any discrimination you face

If you contact us by phone, we will also record the phone call for training and monitoring purposes.

You may also be asked to provide demographic information at your advice session.

This will not affect the advice you receive and will be used to understand more about our service. For more information see the section on statistical processing.

## **How CACE uses your information**

We use the information you give us to:

- provide you with advice, guidance, and information
- stay in touch with you about the advice we are providing
- help with applications such as a debt recovery order or benefit claim
- training our staff and volunteers
- assess the quality of our advice
- investigate complaints or claims
- get feedback from you about our services
- help us improve our services
- address the root causes of the issue you are experiencing
- share stories about your experience with Citizens Advice, with your permission

We may also record any unacceptable behaviour from clients if we deem this to cause disruption to our service or threaten the wellbeing of our staff, volunteers, or any other person.

In some circumstances we may also use your information to carry out legal obligations, including for:

- safeguarding
- fraud prevention
- regulatory compliance

## **How CACE shares your information**

We will generally not share information without your permission, unless required to do so by law or in some limited situations, like to protect you or someone else from serious harm.

If a particular service involves sharing your information without permission, we will always let you know upfront that it is not confidential.

When you give us authority to act on your behalf, for example to help you with a Universal Credit claim, we will need to share information with that third party.

With your permission, CACE commonly shares information with several organisations including the following (not an exhaustive list):

## **Referral partners**

We will share your information with partners when we want to refer you to another service. This may be as part of a jointly run service or where we believe another organisation may be better placed to provide you with the advice you need. We will only make a referral when you have given us your permission to do so.

Some established referral partners include:

- Cumbria Law Centre
- Department for Work and Pensions
- Eden Housing Association
- Foodbanks
- Fuel bank foundation - to issue you with a fuel voucher
- Riverside Housing Association
- Unitary Authorities (Cumberland Council & Westmorland and Furness Council)

## **Funders**

We share information with our funders in order to demonstrate that we are meeting the funding requirements. Information will only be shared in an anonymised manner, unless you give us your permission to share your details, or we need to do so in order to investigate a quality issue, complaint, or claim.

## **Regulators**

We are legally required to provide information to regulatory bodies in some circumstances. These include but are not limited to:

- Ofgem - the regulator for gas and electricity
- Ofcom - the regulator for the broadcasting, telecoms, and postal industry
- Financial Conduct Authority - the regulator for financial and banking services
- Competition and Markets Authority
- Food Standards Agency
- Legal Services Board
- Trading Standards

## **Auditors**

We share information with our internal and external auditors to allow them to carry out audits to ensure that we are complying with our legal obligations and standards of best practice in how we run the organisation.

## **Banks, credit reference agencies and creditors**

We may also share your information with banks or creditors to help get information to assist in our advice.

We will only do this with your permission or where we are legally required to do so.

Information we share will be used for purposes including:

- getting a credit report to assist with financial enquiries
- understanding more about your income and expenditure
- understanding more about the debts you owe

## **Employers or benefit providers**

We may also contact your employer or benefit provider to understand more about your income.

We will only do this with your permission.

## **Translation and interpretation services**

We may share your information with a translation or interpretation service to enable us to communicate with clients who prefer communication in different languages.

## **When we share your information without permission**

At times we might use or share your information without your permission.

If we do, we will always make sure there is 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 are 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 are 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.

This page covers how we, as your local charity, handle your information locally in our offices and our [national Citizens Advice policy](#) provides further information regarding how we handle your personal information.

## **How we use your data for research, feedback, and statistics**

For information on how we use your data to carry out our research, feedback, and statistical work, please see the [national Citizens Advice policy](#).

## **How we use your data when applying to work or volunteer**

### **How we collect your information**

We collect information about you via your application form.

Depending on the role we may also collect information through a Disclosure and Barring Service (DBS) check. You will be informed if such a check will be required for the role at application stage.

### **What information we collect**

We will collect personal information such as name, address, telephone number and email address, previous job history and experience, qualifications, and any support needs you may have.

We will also ask for diversity information like your gender, ethnicity, and sexual orientation. However, you do not have to provide this information.

Where it is needed for the role, we might contact the DBS for a criminal record check. Once the DBS check is completed and you have received your certificate, we would expect you to share this information with us as part of the background check process.

We may also ask for:

- references for your previous and current work
- proof of your right to work in the UK, like a valid UK passport or visa

- your national insurance number and P45
- your bank details, so we can pay you
- details of your student loan if you are paying one back

## What we use your information for

The main reasons we ask for your personal information are to:

- check you have the right skills for a role when you apply
- arrange an interview
- contact you to tell you the result of your application
- do checks when we make an offer, for example contacting your references or checking your right to work in the UK
- send you an offer letter or contract

We will treat any diversity information you give us as strictly confidential. We will anonymise this information and only use it to look at trends. This means we will not look at your information individually or compare it to other people and we will not use it as part of the recruitment selection process.

## Who we share your information with

If you accept an offer to work for us, we will get your permission to share your information with your references.

We will not usually share your personal information with anyone else in a way that could identify you.

In some rare situations we have to share your information, for example if:

- we are investigating a safeguarding issue
- the police ask for the information to help them investigate a crime
- a court orders us to share the information

## Our lawful basis for processing your information

To process your information when you apply to work or volunteer with us, we rely on the following lawful bases:

- **Legitimate interests** - to assess the suitability of candidates
- **Contract** - to create an employment contract
- **Legal obligation** - to carry out legal checks as part of employment screening

Further information is available in the [national Citizens Advice Privacy Policy](#).

## How we use your data when using our website

When you browse our website ([www.cac-e.org.uk](http://www.cac-e.org.uk)) we collect 'cookies' to help us understand more about how our site is used by visitors, and to develop and improve our services to you.

A 'cookie' is a bit of information kept on your computer. It tells us things like what device you are using and what pages you click on.

We use cookies to:

- track aspects of your visits, including the length of your visit, your browser, geographic location, and the use of the search facility on this website
- remember the contrast and/or text resizing style preferences you have chosen for this website – if relevant
- record your video preferences for our YouTube videos viewed on this website

If you do not want to receive cookies, you can change the settings in your web browser. You can also delete cookies that have already been set.

To find instructions on how to restrict or block cookies, click on Help in your web browser and search for 'cookies'.

You can find out more about cookies and how to delete them on the [Information Commissioner's website](#).

## **How long we keep your data for**

We will typically retain your data your 6 years unless we need to keep it for longer.

Further information regarding data retention is available on the [national Citizens Advice Privacy Policy](#).

## **Third party processors**

Third party processors are other organisations that carry out data processing on our behalf.

Third party processors do not use data for their own purposes, and we have agreements in line with data protection law.

For more information, please see the [national Citizens Advice Privacy Policy](#).

## **Who is 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 are a 'joint data controller' for your personal information that is stored in Casebook.

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.

## 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 [business.support@ca-ce.org.uk](mailto:business.support@ca-ce.org.uk)

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

## Raising a concern about how we use your information

If you are concerned about how we have handled your personal information, please contact us:

- **Address:** Citizens Advice Carlisle & Eden, 4th Floor Broadacre House, 16–20 Lowther Street, Carlisle, CA3 8DA
- **Phone:** 03300 563 037
- **Email:** [business.support@ca-ce.org.uk](mailto:business.support@ca-ce.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](mailto:DPO@citizensadvice.org.uk)

## Contacting the Information Commissioner's Office (ICO)

If you are unhappy with how we have used your personal information, you can raise your concern with the Information Commissioner's Office which regulates data protection law in the UK.

Please note, they will normally expect you to have made a complaint to us directly in the first instance.



- **Address:** Information Commissioner's Office, Wycliffe House, Water Lane, Wilmslow, Cheshire SK9 5AF
- **Telephone:** 0303 123 1113
- **Website:** [www.ico.org.uk](http://www.ico.org.uk)