

FULL PRIVACY POLICY

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Background

At Enfield 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.

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 Enfield Citizens Advice. Enfield Citizens Advice 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 store your information in line with [national policy](#).

We do not store your information in paper format as we have transitioned to a paperless office. Any information we request from you will be scanned and stored on our online systems.

What information we collect

When you first contact Enfield Citizens Advice, we will ask to collect the following information:

- Your first name and surname.
- Your current address & post code (you must be paying council tax to Enfield Council to for us to give you more than just information.
- Date of birth.
- Email address.
- Gender.
- Preferred telephone number.
- A brief description of the issue you are currently facing along with supporting documents.

What we use your information for

Information we collect from you is to aid us in understanding your case and how best to proceed. This could be in the form of bank statements, hospital letters, council letters etc. For example, if we were to help you in completing a form for PIP, we would need to collect relevant NHS documents, which is then used as supporting evidence in the application.

Another example would be if we were creating a budget plan for you, we would information regarding your incoming and outgoing expenses, which can be obtained from bank statements and utility bills.

Finally, for the purpose of communicating with you via text message, we use a third-party service provider to securely send these messages. They are legally required to store these messages to comply with government regulation for as long as necessary (4 months in this instance), after which the message is deleted.

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

We share your data in line with [national policy](#).

We may share information by:

- Telephone – for example, if you ask us to call to check the progress of your application for a Discretionary Housing Payment with the London Borough of Enfield
- Letter – for example if you ask us to negotiate in writing with creditors (people you owe money to) on your behalf
- Email – for example, if you ask us to email a letter to your Housing Association to ask them not to evict you while we try and resolve a benefit problem. In such cases, any sensitive information will be sent in a password protected attachment.
- Secure shared calendar – for example, if you ask us to make you an appointment for advice at one of our outreach locations, we will need to tell the staff that you are coming to see us.
- Creating anonymous case studies – for example if the London Borough of Enfield asks us to give an example of how we have helped the people using a project they fund. We will alter any information that could identify you.

Our lawful basis for using your information

When we collect your information for providing advice, our lawful basis for this will fall under legitimate interest. Per ICO's guidance, Article 6(1)(f) gives us a lawful basis for processing where:

“Processing is necessary for the purposes of the legitimate interests pursued by the controller or by a third party except where such interests are overridden by the interests or fundamental rights and freedoms of the data subject which require protection of personal data, in particular where the data subject is a child.”

For special category information that we collect (which includes ethnicity, disabilities and health conditions, sexual orientation, religion and trade union membership), we record and use this information for:

1. The establishment, exercise or defence of legal claims

- This includes establishing legal rights such as housing, benefits, debt solutions
- 2. Substantial public interest - statutory basis
 - when delivering advice laid down in law (e.g. consumer service)
- 3. Substantial public interest - provision of confidential counselling, advice or support
 - When delivering more welfare focused advice that doesn't relate to legal rights and isn't laid down in law

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. Locally we will often need to share information, with your consent, with:

- London Borough of Enfield (for example to help you claim Council Tax Support)
- Department for Work and Pensions (for example to help you appeal against refusal of a national benefit)
- A Housing Association such as Christian Action Housing (for example, if they are your landlord and you have asked us for help with rent arrears)
- Staff at Children's Centres (for example, to tell them to expect you for an advice appointment at a Children's Centre).

Who is responsible for looking after your personal information

The national Citizens Advice charity and Enfield 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](#).

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

When we run our client satisfaction surveys, we collect your information via a paper form that is securely destroyed once the information is processed.

What information we collect

Enfield Citizens Advice will only collect your ethnicity, age, gender and any disabilities and answers to the survey questions. All our surveys are anonymous, and we would not ask for your name and address. Enfield Citizens Advice also collates information relating to the issues we help clients within the form of monitoring spreadsheets and statistical reports.

What we use your information for

We collect this information to ensure we are helping all demographics in our local community and to gain insights into local issues for research & campaign purposes.

Who we share your information with

The information we collect in monitoring spreadsheets is shared with our funders to demonstrate our impact in the local community. All identifiable information about clients is anonymised before this is collated and sent out.

Our lawful basis for using your information

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.

How we use your data when applying to work or volunteer

What information we collect

When you contact Enfield Citizens Advice to work or volunteer with us, we will ask only for data that will help us ensure we are recruiting the best candidates. This includes data, which will allow us to work in guidance with equity, diversity and inclusion principles. To achieve this, we will collect data on your age, disabilities, religion etc. This way we will aim to ensure our workforce reflects our borough and our client group.

Equally important, this will allow us to offer you to work in a supportive work environment so that should you need any reasonable adjustments these can be provided for you. We are committed to keep your data safe and confidential and use it only for the purposes of the most adequate recruitment and securing equitable workspace for you.

How we collect your information

We collect your data initially when you are submitting your application through a word document. This is sent to a secure mailbox and is viewed by the recruitment and training team.

What we use your information for

Your information is used to ensure best recruitment outcomes and any work-related adjustments you might need. We use your information to compare between candidates during the recruitment process. If you are successful, your application form is stored in a personnel file. If you are unsuccessful, this is kept for 6 months, starting from the decision date and then securely destroyed.

Who we share your information with

Your information could be shared with a company that we use to conduct DBS checks. This is then shared with us as a summary report.

How we use cookies on our website

We only use cookies on our website to track how many people have viewed our page, what device they've viewed it on and where in the country they viewed it.

How long we keep your data for

National Citizens Advice is responsible for managing any data in joint client case records. For more information please see their [privacy notice](#).

We do not hold any client paper records since our migration to being a paperless office.

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 this [ICO website](#) page to learn more and their [Right to Erasure page](#).

Contact Citizens Advice Enfield about your information

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

- Telephone: 0800 014 8307 (Monday to Friday 10am to 4pm)

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

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 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