

Oxford Churches' Debt Centre Data Privacy Notice

1. Data controller details

Oxford Churches Debt Centre (henceforth referred to as OCDC) has a legal duty to protect your information and provide you with information about your data protection and privacy rights. As we control how the information we collect will be used, the law refers to us as a "data controller".

Our registered address is:

St Clement's Parish Office, Cross Street, Oxford. OX4 1DA

We keep our privacy notice under regular review. This privacy notice was last reviewed in May 2021.

2. What personal information do we collect?

We collect information:-

- When you enquire about using our services;
- As part of us providing you with our services;
- When you apply for either an employment or volunteering opportunity.

We currently collect and process the following information:

- **Clients:-**Personal identifiers, contacts and characteristics (for example, name and contact details).
- **Staff job applications:-** Personal identifiers, contacts and characteristics (for example, name and contact details), CV, completed job application form, interview notes, decision of whether to appoint.
- **Volunteer applications:-** Personal identifiers, contacts and characteristics (for example, name and contact details), church leader and general references, and/or a DBS check, preferences for areas of involvement, availability.
- **Supporters:-** Personal identifiers, contacts and characteristics (for example, name and contact details), bank account details, completed Gift Aid form.

3. Why do we collect this information?

Clients: we will initially use the information we collect from you to contact you to arrange an appointment, to provide you with details of our services in your area, or to enable you to use our online budgeting tool. We will then use your information to provide you with any service(s) we have agreed with you. As a faith-based charity, we may offer you our support through prayer, so we will record whether you are happy for us to do this so we can make sure we respect your wishes. For Debt Help clients, we will use your financial information to advise you about how to deal with your debts and we may contact your creditors to make payment arrangements with them. Early on in our time working with you, we will ask you to complete a data consent form so you can choose if and how you wish us to stay in contact with you after you have gone debt free and once you have finished using the debt services.

For clients of other services, we will use your information to remain in contact with you for support, and record your ongoing progress. We may use our clients' information for the following legitimate

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interests: to contact you with information about other free services CAP offers that may be suitable for you, or to invite you to take part in research and feedback in relation to our services. We may also contact you to invite you to any free events (for example, client socials) that we may run from time to time, if we consider that they might be suitable for you.

Supporters: we will use the information we collect from you, including your level of interest, support for us and location, to tell you more about our work. We will also thank you for your support, and invite you to continue to support us. We may also use your information to invite you to fundraising or other events, or to ask if you would be able to increase your support. We will also process your information on the basis of our legitimate interest to improve our fundraising strategies. This will include analysing the information we collect about you and using publicly available information to aid our understanding of our supporters, understand the level of potential donations, profile supporters into categories and help provide a personalised service to you on our website content and emails. We will always do this in compliance with the rules in relation to direct marketing, including those set out by the Fundraising Regulator.

Job applicants and volunteers: We will use the information we collect from you to process and consider your application for a role at OCDC. Your information will only be shared with the centre manager and administrator and other OCDC staff who are involved in the recruitment and sign-up process as well as Debt Coaches when choosing befrienders for clients. We will only request a reference or DBS disclosure with your prior consent.

4. When will we share your information?

If you are a client, we may obtain your consent to share your information with third parties so that we can provide you with our service – for example, by sharing debt help clients' information with their creditors. We will not normally share any information we hold about you to others without your prior consent, unless one of the following exceptions apply:

- If it is necessary for law enforcement or similar purposes;
- For the legitimate interest of reviewing the quality of our services – for example, the Advice Services Alliance and the Money and Pensions Service may audit our Debt Help service. The regulator of our Debt Help service, the Financial Conduct Authority, also has the right to inspect our files. This includes information we hold about you, to ensure we are complying with their rules;
- As a necessary part of providing you with our service(s) or contacting you as a supporter - for example, by using a third party mailing house to process our communications;
- As a necessary part of ensuring we comply with our legal obligations as a data controller - for example, by using a third party to migrate data or ensure it is accurate and up-to-date;

If you are a volunteer or employee, your data may be shared with colleagues within OCDC where it is necessary for them to undertake their duties. For example, someone overseeing you will need your information in order to effectively, and safely, facilitate your volunteer role or job. We may share your data with third parties in order to obtain references as part of the recruitment process, and, if appropriate, complete DBS checks or other pre-recruitment screenings.

5. Data transfer outside of EEA

OCDC will not transfer your data outside of the European Economic Area (EEA).

6. Automated decision making

No decision will be made about you solely on the basis of automated decision making (this is where a decision is taken about you using an electronic system without human involvement).

7. Storing your personal data

We will take all reasonable steps to ensure that the information we hold about you is kept safe and secure. Your personal data will be stored on password protected IT systems and any paper files will be kept in locked areas.

8. How long do we keep your information for?

We will only hold your personal data for as long as it is required in line with the schedule below. Deleting your information may involve either the removal of the data or anonymising it, meaning that it no longer continues to be personal data that will identify you. The following table sets out some of the main retention periods we have in place for the data we hold:

Type of data	Retention period	Reason for retention period
Debt help client information	Up to 6 years from date case was closed	To allow for the defence of legal claim in line with the Limitation Act 1980
Other client information	3 years from date of last interaction	To allow us to analyse our client outcomes
Supporter information	6 years from date of last interaction	HMRC requirement in relation to Gift Aid records
Job application forms (if unsuccessful)	6 months from date of letter saying the application was unsuccessful	CIPD Recommended practice
Employee records	6 years from leaving date	HMRC requirement
Unsuccessful volunteer applications	6 months from date of communication the application was unsuccessful	Recommended practice
Volunteer record (leaver)	6 years from leaving date	Related to any legal claims, formal complaints or outstanding health and safety issues.
Volunteer record (inactive)	6 months from date record was deemed inactive	Recommended practice

9. What are your rights over your information?

You have the following rights in relation to your information:

- You may withdraw consent where we are using your information on the basis of this;

- You may object where we are using your information on legitimate interest grounds;
- You can ask us what information we hold about you and can request a copy of this. There is normally no fee for this - unless a request is manifestly unfounded or excessive;
- You can ask us to correct information we hold about you if it is inaccurate;
- You can ask us to erase your information in some circumstances;
- You can ask us to stop using your information for a period of time if you believe we are not doing so lawfully;

To submit a request by email, post or telephone, please use the contact information provided below. We will deal with your request within one month, unless it is particularly complex, in which case we will contact you within one month to let you know that we may need a further two months to comply.

10. What is your right to complain?

How to complain

If you have any concerns about our use of your personal information, you can make a complaint to us via the Chair of Trustees using the OCDC office postal address.

You can also complain to the ICO (Information Commissioner's Office) if you are unhappy with how we have used your data.

The ICO's address:

Information Commissioner's Office
Wycliffe House
Water Lane
Wilmslow
Cheshire
SK9 5AF

Helpline number: 0303 123 1113

ICO website: <https://www.ico.org.uk>

How can you contact us?

Please contact our Data Protection Officer (centre manager) if you have any questions about our privacy policy or information we hold about you. They can be reached by using the postal address at the top of this notice, by email: oxchdc@gmail.com or by phone: 01865 249008.