

# Citizens Advice Telford & the Wrekin Privacy Policy

At Citizens Advice Telford & the Wrekin, 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 Telford & the Wrekin. Citizens Advice Telford & the Wrekin 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**

To find out more, see our [national Citizens Advice privacy policy](#).

### **What information we collect**

To find out more, see our [national Citizens Advice privacy policy](#).

### **What we use your information for**

To find out more, see our [national Citizens Advice privacy policy](#).

### **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

With your written consent, we sometimes need to share your personal information with organisations you wish us to refer you to, or with organisations we need to send your data to as part of the casework.

We may also occasionally share client statistical information with funders.

### Our lawful basis for using your information

We collect information for different purposes. These purposes and the lawful basis we use to collect and process this information are detailed below:

Purpose	Lawful Basis Used
Advice, information and guidance provision	<ul style="list-style-type: none"> <li>• Legitimate interests</li> <li>• Public task</li> </ul>
EDI Monitoring	<ul style="list-style-type: none"> <li>• Legitimate interests</li> </ul>
Accessibility and reasonable adjustments	<ul style="list-style-type: none"> <li>• Legitimate interests</li> </ul>
Statistical purposes and research (including feedback)	<ul style="list-style-type: none"> <li>• Legitimate interests</li> </ul>
Direct marketing of Citizens Advice services	<ul style="list-style-type: none"> <li>• Legitimate interests</li> <li>• Consent</li> </ul>
Publication of client stories	<ul style="list-style-type: none"> <li>• Consent</li> </ul>
Maintaining quality and standards	<ul style="list-style-type: none"> <li>• Legitimate interests</li> </ul>
Complaints	<ul style="list-style-type: none"> <li>• Legitimate interests</li> </ul>
Legal claims	<ul style="list-style-type: none"> <li>• Legitimate interests</li> </ul>
Individual rights requests	<ul style="list-style-type: none"> <li>• Legal obligation</li> </ul>
Safeguarding	<ul style="list-style-type: none"> <li>• Public task</li> </ul>
Fraud prevention	<ul style="list-style-type: none"> <li>• Legitimate interests</li> <li>• Legal obligation</li> </ul>
Responding to a life-threatening emergency	<ul style="list-style-type: none"> <li>• Vital interests</li> </ul>

[You can read more about the lawful basis for data processing on the ICO 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**

We collect information through feedback forms and at the start of the advice process for research, feedback and statistics. Our feedback forms are not mandatory however we do need to gather information about you at the start of our advice process which can be used for research and statistics. You do not need to share any personal information if you don't want to.

## **What information we collect**

We only ask for the information we need to tell your story or inform our research. Depending on how we want you to help us, this might include information about:

- your situation like family, work or financial circumstances - and how it affects you
- how you use Citizens Advice and other organisations' services - and what you thought about them
- your name and contact details - so we can keep in touch with you
- demographic information like your gender, ethnicity or sexual orientation

If you don't want to give us some personal details, you don't have to.

You can withdraw your permission for us to store your personal information at any time - known legally as withdrawing consent. Tell us what personal information you don't want us to store, and we'll delete it.

## **What we use your information for**

Any information collected through our feedback form is used to improve our service and inform change. Personal information is used in reports for case studies, client stories, and to help highlight trends and issues as they arise.

If we choose to use your information in a case study or client story, we will contact you to explain how we want to use your information - for example, we might want to:

- ask you to share your story with the media
- include your information in a report or blog as part of our research and design, campaigns, or media work
- use your information to improve our services

We only access your information for other reasons if we really need to - for example, to investigate complaints.

All staff accessing data have done data protection training to make sure your information is handled sensitively and securely.

### **Who we share your information with**

If we're sharing your story publicly, you can stay anonymous if you want to - we'll change some details of your story to make sure you can't be identified. We may, from time to time, share client stories or case studies with funders – these are always anonymised.

We might share your information with government or industry regulators as part of our campaigns and policy work.

Organisations we share your data with must store and use it in line with data protection law - they can't pass it on or sell it without your permission.

### **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. We may also keep pseudonymised data for archival purposes.

## How we use your data for fundraising and donations

This section covers how we use your data to carry out our fundraising activities. National Citizens Advice covers their use of data for fundraising in their [privacy notice](#).

### How we collect your information

As part of the fundraising process, we may receive information such as your name and address, however you choose what to share when making a donation. For any donations made via other online platforms (e.g. Easyfundraising, Twincl) please refer to their respective privacy policies.

### What information we collect

We sometimes receive donations via other third-party donation platforms (e.g. Easyfundraising, Twincl or other online donation platforms). Please refer to their privacy policies to find out how they keep your data secure.

### What we use your information for

We'll only use your data for the reason it was collected. For example, for:

- processing information internally
- deciding how we continue to communicate with you and what we send
- reviewing our services and how we operate

### Who we share your information with

We might share your information without your consent if we're required to by law, for example:

- to assist police enquiries
- in response to court orders
- to prevent fraud
- to protect your safety or the safety of others

We sometimes share your data within our local Citizens Advice network. For example, if you have specified that your donation is for one of our local Citizens Advice offices, we will securely share the following details with the local office when we transfer your donation to them:

- Your contact details, including your name, postal address, email and phone number
- The amount of your donation and whether you have added Gift Aid to your donation

## **Our lawful basis for using your information**

The lawful grounds we use to process your personal data are:

- contractual - if we enter into a contract with you, we'll process information to administer that contract
- legal obligations - we'll sometimes pass on personal information to comply with our legal obligations. For example, providing tax and gift aid information to HMRC in the UK
- legitimate interest - our legitimate interests enable us to meet our charitable objectives. This includes governance and operational management, publicity and income generation, administration and financial management and control
- consent - we rely on consent as a legal basis to process your information when we send you marketing communications about fundraising, campaigning or events. You have the right to withdraw your consent at any time by emailing [feedback@telfordcab.co.uk](mailto:feedback@telfordcab.co.uk) or by clicking the unsubscribe link in any emails we send you.

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

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

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

- assess your suitability for the role you have applied for
- to contact you to let you know the outcome of your application
- arrange an interview
- send job alerts based on your preferences
- issue an offer letter and/or contract

and we'll only get access to your information for other reasons if we need to - for example:

- to investigate complaints

- to fulfil Subject Access Requests
- to get feedback from you about our services
- to help us improve our services

Any special category data you have chosen to provide will be treated as strictly confidential and will only ever be used at an aggregate level. It will not form part of the recruitment assessment or selection process.

There is an exception to the treatment of special category data being used for selection and assessment for the question regarding the 'Guaranteed Interview Scheme' for people with disabilities. In this case, the hiring manager and the recruitment team will see an indicator on your application that you have applied under this scheme. They will treat this information as strictly confidential and they will not have access to any other special category data.

### **What information we collect**

When you sign up for job alerts or apply for a role at Citizens Advice we will ask you for personal information including:

- Your name
- Address
- Email address
- Contact number
- Date of birth
- Any personal data you have chosen to include on your CV and covering letter

We will also ask you to complete an Inclusion Monitoring form. This allows us to monitor our various people processes to ensure we are meeting our Inclusive Employer goals and enables us to appropriately focus our recruitment activities on those areas where we might not be fully inclusive. Data collected on this form includes:

- Race and Ethnicity
- Religion/Faith/Belief
- Sex
- Disability as described in the Equalities Act 2010
- Sexual orientation



This type of information is known as 'special category data'. You may withdraw your consent to us storing this data at any time. Tell us the personal information you don't want us to store by emailing [recruitment@telfordcab.co.uk](mailto:recruitment@telfordcab.co.uk) and we'll delete it.

Completion of the inclusion monitoring form is not mandatory and there is no obligation to provide this information if you would prefer not to.

If an agency applies on your behalf, they will provide the following information about you:

- Your postcode
- Any personal data you have chosen to include on your CV and covering letter

If you are invited for an interview, you will be asked to provide an original document to prove your right to work in the UK. By law we must have seen and taken a copy of this before you can commence employment. A copy will be made by the hiring manager who will then -

- store the copy confidentially in your electronic employee record file if you commence employment at Citizens Advice
- destroy the copy confidentially if you are unsuccessful

### **Who we share your information with**

If you accept an offer of employment we will seek your permission to contact your chosen referees as part of the pre-employment checks.

From time to time, we may share anonymous aggregated sets of data with trusted external organisations for the purposes of statistical analysis.

If you're offered a role, where applicable, we may ask you to fill out a Disclosure and Barring Service (DBS) form as part of mandatory background checks. A DBS form does ask for some personal information as part of the background check process. These forms are stored and processed securely and confidentially by Citizens Advice and DBS.

### **Our lawful basis for using your information**

We have a legitimate interest to use and process your information when you apply to work or volunteer with us.

## How we use your data when using our website

### What information we collect

Our website collects cookies to distinguish you as a unique user of the site. [You can read more about the cookies we collect here.](#)

### How we collect your information

To give you the best possible experience when browsing our website we add small files (known as 'cookies') to your computer to collect information about how you browse the site.

### What we use your information for

Cookies are used to:

- measure how you use the website so it can be updated and improved based on your needs
- remember the notifications you've seen so that we don't show them to you again

### Who we share your information with

Cookies are not shared; however, they may be collected by third parties. Please see our [cookie policy](#) for more information on the cookies that are collected.

### Our lawful basis for using your information

We use legitimate interest as the lawful basis for using your information once it has been collected.

## 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](#).

Data	Purpose	Retention
Low risk client records	We store data on our clients for research & campaigns work, data analysis, and to streamline repeat client visits.	6 Years
High risk client records	In cases relating to serious complaints, insurance claims, disputes, etc. or in unusual cases with substantial risk, we may need to hold data for longer.	16 Years

## Third party processors

Third party processors are other organisations that carry out data processing on our behalf. Third party processors don't use data for their own purposes, and we have agreements in line with data protection law.

Processor name	Activities	Data hosting location
Microsoft	Storage of data sent by email, held in SharePoint, and analysed in Office applications.	UK, EU
Google	Storage of data submitted through contact forms	EU
Telford & Wrekin Council	Manage IT systems, partner referral forms & host CATW website	UK
The Net	Storage and processing of data from The Net project	UK, EU

National Citizens Advice are another third party processor, for their privacy policy please see [here](#).

## 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 [louisecross@telfordcab.co.uk](mailto:louisecross@telfordcab.co.uk)

## **Raising a concern about how we use your information**

If you are concerned about how we have handled your personal information, please contact [louisecross@telfordcab.co.uk](mailto:louisecross@telfordcab.co.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)**

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