Wiltshire Citizens Advice Privacy Policy

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1. Purpose

At Wiltshire 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. We only ask for the information we need. We always let you decide what you're 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
- don't sell it to anyone

2. 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 Wiltshire Citizens Advice Citizens Advice. Wiltshire 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.

3. 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.

4. 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.

4a. How we collect your information

This will depend on which service you are accessing; for national services, please see the national Citizens Advice privacy notice. If you contact our service directly, we will ask you for information about yourself in order to provide you with tailored advice.

If another organisation has referred you to us, they'll send us your information using a referral form. They'll get your permission before sending us your information.

4b. What information we collect

We'll only ask for information that's relevant to your problem. Depending on what you want help with, this might include:

- your name and contact details – so we can keep in touch with you about your case
- personal information – for example, about family, work, or financial circumstances, or if you're vulnerable or at risk of harm
- details about services you get that are causing you problems – like energy or post
- details of items or services you've bought

We occasionally ask for details about someone else like a neighbour or your partner so we can deal with an enquiry. We'll only do this if we have a legitimate interest in the information, or we need it to protect someone's life.

If you don't want to give us certain information, you don't have to. For example, if you want to stay anonymous, we'll only record information about your problem and make sure you're not identified.

However, we may be limited in the advice we can provide you without certain information, for instance, when advising on benefit eligibility and entitlement, we require details of any health conditions or disabilities.

4c. What we use your information for

The main reason we ask for your information is to help solve your problem. We only access your information for other reasons if we really need to – for example:

- for training and quality purposes
- to investigate complaints
- to get feedback from you about our services
- to help us improve our services

If you have any questions about how your information is collected or used, you can contact Citizens Advice Wiltshire at info@citizensadvicewiltshire.org.uk

You can read more detailed information about how some of our services use information on our national site.

4d. Our confidentiality policy

At Citizens Advice, we have a confidentiality policy that states that anything you tell us as part of our advice will not be shared outside of the Citizens Advice network unless you give us permission 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. 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

4e. Who we share your information with

When you give us authority to act on your behalf, we may need to share information with relevant third-party organisations. For example, when helping you with council tax issues, we may need to share information with Wiltshire Council, or when helping you with issues regarding your benefits, we may need to share information with the DWP or our partner organisations, such as local housing associations, Wessex Water, Macmillan, and Food Banks. However, this is not an exhaustive list.

Please note: For some third-party projects, such as those supported by Wiltshire Council, the caseworker may record your information on a secure system provided by the council instead of our usual Citizens Advice system. This is only done for specific projects, and we will always let you know if this applies to you. Your information will still be handled confidentially and in line with data protection laws.

4f. Our lawful basis for using this information

We process client and witness data in accordance with the UK General Data Protection Regulation (UK GDPR) and the Data Protection Act 2018. The lawful basis for processing depends on the purpose and nature of the data involved:

1. Advice, Information, and Guidance
Legal Basis: Legitimate interests (Art. 6(1)(f)) or Public task (Art. 6(1)(e))
Special Category Data: Legal claims (Art. 9(2)(f)), substantial public interest (Art. 9(2)(g))
Consent Required?: No, but clients may remain unnamed

2. Funder Sharing
Legal Basis: Case-by-case, depending on funder's purpose
Consent Required?: Case-by-case

3. Equality, Diversity, and Inclusion (EDI) Monitoring
Legal Basis: Legitimate interests (Art. 6(1)(f))
Special Category Data: Substantial public interest (Art. 9(2)(g))
Consent Required?: Yes, with 'prefer not to say' option

4. Accessibility and Reasonable Adjustments
Legal Basis: Legal obligation (Art. 6(1)(c))
Special Category Data: Substantial public interest (Art. 9(2)(g))
Consent Required?: Yes, optional

5. Statistical Purposes and Research
Legal Basis: Legitimate interests (Art. 6(1)(f))
Special Category Data: Research/statistics (Art. 9(2)(j))
Consent Required?: Generally no, unless client contact is involved

6. Direct Marketing
Legal Basis: Legitimate interests (Art. 6(1)(f)); Consent (Art. 6(1)(a)) for electronic marketing

Consent Required?: Yes, for electronic marketing

7. Publication of Client Stories
Legal Basis: Consent (Art. 6(1)(a)); Explicit consent (Art. 9(2)(a))
Consent Required?: Yes, if identifiable

8. Quality and Standards
Legal Basis: Legitimate interests (Art. 6(1)(f))
Special Category Data: Legal claims (Art. 9(2)(f)), substantial public interest (Art. 9(2)(g))
Consent Required?: No

9. Complaints
Legal Basis: Legitimate interests (Art. 6(1)(f))
Special Category Data: Legal claims and substantial public interest
Consent Required?: No

10. Legal Claims
Legal Basis: Legitimate interests (Art. 6(1)(f))
Special Category Data: Legal claims (Art. 9(2)(f))
Consent Required?: No

11. Individual Rights Requests
Legal Basis: Legal obligation (Art. 6(1)(c))
Special Category Data: Substantial public interest (Art. 9(2)(g))
Consent Required?: No

12. Safeguarding
Legal Basis: Public task (Art. 6(1)(e))
Special Category Data: Substantial public interest (Art. 9(2)(g))
Consent Required?: No

13. Fraud Prevention
Legal Basis: Legitimate interests (Art. 6(1)(f)), Legal obligation (Art. 6(1)(c))
Special Category Data: Substantial public interest (multiple provisions)
Consent Required?: No

14. Life-Threatening Emergencies
Legal Basis: Vital interests (Art. 6(1)(d))
Special Category Data: Vital interests (Art. 9(2)(g))
Consent Required?: No, only used when consent is not possible

5. How we use your data for research, feedback, statistics, fundraising and donations

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

At Citizens Advice Wiltshire, we take your privacy seriously. Before we use any information for research, feedback, or statistics, we remove all details that could identify you like your name or contact details. Because your data is fully anonymised, we don't need a legal reason (known as a 'lawful basis') to use it in this way.

5a. What information we collect and what we use it for

At Citizens Advice Wiltshire, we're always looking for ways to better support our community. To help us do this, we sometimes use information about the advice we give to look at patterns and trends.
We might use:

- The types of issues people come to us with (like housing, benefits, or debt)
- General information like age group, gender, or postcode area
- Feedback from surveys or comments about our service

This helps us to understand what issues are affecting our community, improve our services and make them fair and accessible and to support campaigns that help bring positive change not only locally but on a national level.

5b. Who we share your information with

Fully anonymised information is used internally to inform campaigns but also with government departments to help and shape national policy and improve public services.

5c. Our lawful basis for using this information

Please refer to point 4f above.

6. What information we collect when applying to work or volunteer

When you apply to Wiltshire Citizens Advice we collect your personal information through your application form, interview or references so that we can process your application. We only ask for information that is relevant to the role you are applying for.

We collect personal details such as name, address, telephone number, e-mail address, previous job history and experience, qualifications, and any support needs you may have. We also ask for diversity information like your gender, ethnicity and sexual orientation. You don't have to tell us this - if you do it is always anonymised. We might collect other information depending on whether you've applied for a staff or volunteer role.

6a. If you have applied for a staff role

If we offer you a position, we will ask for:

- references for your previous and current employer
- 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 that we can pay you

If you are offered a role, where applicable, we may ask you to complete a Disclosure and Barring Service (DBS) form as part of mandatory background checks. A DBS form asks for some personal information as part of the background check process. Further information

is available at the government website DBS.

6b. If you have applied to volunteer for Wiltshire Citizens Advice

We will ask your referees about your previous and current work and experience if we offer you a volunteering position.

6c. What we use your information for

We will use the information you provide to determine whether you have the right skills for the role. We will use demographic information to ensure we employ a diverse workforce and volunteer community.

Staff who access your information have received information protection training to ensure that it is handled sensitively and securely. We keep your information securely on internal HR systems. Some information is recorded within the cloud-based Google Drives of the dedicated project Google accounts, which also have a spreadsheet tracking work in progress.

7. How we use your data when using our website

When you use our website, we collect your information in a number of ways.

We use data called 'cookies' to get information about how you're using our website - for example, what pages you visit and what device you're using.

Find out more about how we collect and use cookies when you browse our website here.

We also collect information about you if you:

7a. Contact us for advice using our Contact form

If you use our 'Contact' form, for example to request advice by email, your information will be logged on Citizens Advice case management systems.

In most cases, as well as logging your email advice request form in Citizens Advice case management systems, copies are also stored online in a secure part of our website. It's stored there for up to 3 months before being deleted.

Emails between you and your adviser are stored within our local Wiltshire Citizens Advice email systems.

7b. How Citizens Advice Wiltshire store your information

The national Citizens Advice charity and Wiltshire 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.

7c. How long we keep your data for

National Citizens Advice is responsible for managing any data in joint client case records and they do so as per their privacy notice.

8. 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
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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 info@citizensadvicewiltshire.org.uk

9. 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 info@citizensadvicewiltshire.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 Wiltshire Citizens Advice 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