

Test Valley Citizens Advice Privacy Policy

At Test Valley 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 Test Valley Citizens Advice. Test Valley 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

Information is collected via a 'Welcome Sheet' which is completed by you or on your behalf by an Adviser when accessing the service.

Information can also be collected via an 'email enquiry form' found on our local website or verbally via the Adviceline telephone service.

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
- details about services you get that are causing you problems – like energy or post
- details of items or services you've bought, and traders you've dealt with
- information like your gender, ethnicity or sexual orientation

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.

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 service
- to help us improve our services

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

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

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. This may be the Local Authority, Housing Association or landlord, Advocacy service or other organisations we work with.

Organisations we share your data with must store and use your data in line with data protection law.

Our lawful basis for using your information

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.

For your Special Category Data we may process your data for the 'establishment or defence of legal claims including legal rights' including but not limited to those such as those in relation to benefits, debt, energy and housing. We may also process your Special Category Data under a 'substantial public interest' basis under data protection law.

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

For local collection of data you may be asked to complete a webform or printed copy form.

What information we collect

We collect information related to your experience using the service. Providing this information is entirely optional.

What we use your information for

The information collected is used to identify issues with the service or its delivery and to make improvements.

Who we share your information with

We do not share this information with any other organisation or party.

Our lawful basis for using your information

We have a legitimate interest to carry out statistical analysis and research using our client data.

How we use your data when applying to work or volunteer

How we collect your information

Your information is collected via an application form provided to you after your expression of interest in becoming a volunteer.

What information we collect

As part of the application process information is collected to enable us to contact you to discuss your application, your background which may be relevant to the role and your availability should your application be successful.

What we use your information for

Your information is used to discuss relevant opportunities with you, manage our recruitment process, take up references and may be used to undertake DBS checks where this is required.

Who we share your information with

Your information will be shared with any person who you designate as a referee and to undertake DBS checks where relevant.

Our lawful basis for using your information

We really on your explicit consent for retaining and processing your information, including any Special Category Data. You may withdraw this consent at any time.

How we use your data when using our website

What information we collect

We do not collect any information from visitors to our website, except when provided by a visitor completing our email enquiry form. Those completing the email enquiry form are asked to provide information that's relevant to their 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
- details about services you get that are causing you problems – like energy or post
- details of items or services you've bought, and traders you've dealt with
- information like your gender, ethnicity or sexual orientation

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.

How we collect your information

Information is collected via online form

What we use your information for

This information is used to identify your legal rights and responsibilities and to provide relevant information, advice and support.

Who we share your information with

We do not share the information you provide with other organisations or Third Parties without your consent

Our lawful basis for using your information

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.

For your Special Category Data we may process your data for the 'establishment or defence of legal claims including legal rights' including but not limited to those such as those in relation to benefits, debt, energy and housing. We may also process your Special Category Data under a 'substantial public interest' basis under data protection law.

How we use cookies on our website

Cookies are used to establish your preferred language

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](#).

Information on staff and volunteer data retention periods can be found in the separate Data Retention policy.

Data	Purpose	Retention
Client record and Case record (including all attachments)	In order to provide our advice services to returning clients it is necessary to retain the categories of information we collect or create as part of their interactions with us.	6 years from last substantive action such as updating a case note or debt assessment
Safeguarding concerns	Safeguarding concerns - as a disclosure or non-disclosure may result in further action we are legally required to retain information.	16 years from the record of the concern, unless the case is retained further for another purpose.
Individual reason - defence of legal claim or other action	Particular claim type arising or sensitivity to the case that cannot be anticipated as a category here. Justification recorded in case notes	16 years from last substantive action such as updating a case note or debt assessment

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
HB Tech	I.T. Provider	United Kingdom
LFM	Payroll Processor	United Kingdom

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 co@testvalleycab.org.uk

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 co@testvalleycab.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

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