

North Warwickshire Citizens Advice

Privacy Notice

At North Warwickshire 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 North Warwickshire Citizens Advice. North Warwickshire 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

When we provide advice we either collect this data directly from you or receive it through a referral from a partner organisation.

For details about how our advice services collect your information, please see the national Citizens Advice [privacy notice](#).

What information we collect

To support your enquiry we collect information about you and your circumstances. You can choose which information you give us, but not providing certain information may limit the advice we can give you.

For details about what information our advice services collect, please see the national Citizens Advice [privacy notice](#).

What we use your information for

For details about how our advice services use your information, please see the national Citizens Advice [privacy notice](#).

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

If a particular service involves sharing your information without permission, we will always let you know upfront that it isn't confidential.

Who we share your information with

We will share your information with partners when we want to refer you to another service. This may be as part of a jointly run service or where we believe another organisation may be better placed to provide you with the advice you need.

We will only make a referral when you have given us your permission to do so. We will agree with you exactly what information will be shared and with whom before making the referral.

Periodically, we share anonymised case studies with our funders such the National Association of Citizens Advice Bureaux, Warwickshire County Council, Cadent Gas Ltd. The Information Commissioner's Office website has information about how personal data is anonymised: [What is personal data? | ICO](#)

Aggregate data is also shared periodically with our funders including Warwickshire County Council, North Warwickshire Borough Council and Cadent Gas Ltd. This means that data is combined to form statistics - because of this, the data will be anonymous unless very small numbers of individuals are involved. For example, we share the number of clients we have seen, or the

number of issues we have helped with - care is taken to ensure that this results in an anonymised data sample from which individuals cannot be identified.

National Citizens Advice's [privacy notice](#) includes further information about how and when we share information with third parties.

Our lawful basis for using your information

Activity	Lawful basis for collecting personal data	Lawful basis for collecting special category or criminal convictions data
General advice provision and funded services (unless listed below)	Legitimate interests - we have a legitimate interest to provide advice to our clients	Establishment, exercise or defence of legal claims - where we are helping clients establish their legal rights Substantial Public Interest (provision of confidential counselling, advice or support) - where we are providing advice to clients which doesn't relate to their legal rights.
Accessibility requirements	Legal obligation - we have legal obligations in accordance with the equalities legislation	Substantial public interest (statutory obligation) - obligations under equalities legislation.

Marketing new advice services	<p>Legitimate interests - we have a legitimate interest in promoting advice services which could benefit our clients</p> <p>Consent - where marketing rules require consent to do so</p>	N/A
Maintaining quality and standards	<p>Legitimate interests - we have a legitimate interest in ensuring that our service is run properly and that standards are maintained</p>	<p>Establishment, exercise or defence of legal claims</p> <p>Substantial public interest (protecting the public against dishonesty etc) - where we are carrying out functions to protect against:</p> <ul style="list-style-type: none"> - dishonesty, malpractice or other seriously improper conduct - unfitness or incompetence - mismanagement in administration
Safeguarding	<p>Public task - in complying with safeguarding obligations</p>	<p>Substantial public interest (Safeguarding of children and of individuals at risk)</p>

Fraud prevention	<p>Legitimate interests - we have a legitimate interest in defending against fraudulent activity</p> <p>Legal obligation - in some circumstances there are legal obligations to disclose actual or suspected cases of fraud</p>	<p>Substantial public interest - (preventing and detecting unlawful acts, preventing fraud, Suspicion of terrorist financing or money laundering)</p>
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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.

While advising you, we will generally ask for your consent to share your information with national Citizens Advice so that they can contact you for feedback on our service. If you do not agree to this, we will not share the information for this purpose. National Citizens Advice covers their use of data for this purpose in their [privacy notice](#).

We also have a form we use locally to gather feedback on our services. This form does not gather personal information - it is used to ask for anonymous feedback on the effectiveness of our service.

The summary of the feedback we receive is shared with our funders, for example Warwickshire County Council. It is also used to improve our services.

On any occasion where we seek to publish client stories in an identifiable format, we will only do so with your consent. You will be fully informed about what information is shared and who the information is shared with when being asked for your consent to share the information.

How we use your data when applying to work or volunteer

North Warwickshire Citizens Advice needs to collect, use, store and share certain information about workforce member applicants (this includes for both employed and volunteer roles) to manage their applications and involvement with the organisation. This is collated and stored using Microsoft SharePoint.

We use information about workforce and potential workforce members to answer your questions about the post or application process, and to process your application. Information you provide will be shared with relevant people within our organisation for these purposes.

We also use the information you provide to monitor Equity, Diversity and Inclusion amongst applicants and workforce. One of our goals is that our workforce is representative of the communities that we live and work in. To monitor how well we are progressing against this goal, you may be asked some questions relating to sensitive categories of personal information including your gender identity, ethnicity, sexual orientation and disability status. We will seek your explicit consent to use this data for our purposes, which you can amend at any time by emailing admin@nwcab.org.uk.

If your application is successful, throughout the course of your onboarding and volunteering journey we may collect and store additional information about you for the following purposes:

- **To monitor training:** When releasing mandatory training it is within our legitimate interest to monitor the completion of that training and take action where this is not complete. We may use data from different internal sources to identify when someone who is actively part of our workforce has not undertaken training.
- **To investigate complaints:** Interactions between clients and our workforce are stored on our Case Management System and may be used to support investigation of specific incidents and complaints, for example, it may be used to identify which volunteer handled a case that gives rise to a complaint from the client.

- **To monitor and conduct investigations into workforce conduct, wellbeing and performance:** There may be circumstances where we are required to investigate your conduct as a result of a complaint or allegation made against you. This will be dealt with under our internal policies. As part of an investigation, we may collect information from you and others involved for the purpose of assisting with our investigation of the matter and retain this for an appropriate period in order to evidence appropriate internal investigations into serious matters in line with our obligations to safeguard our clients, volunteers and employees.
- **To make referrals to relevant bodies:** In some cases, it may be necessary for reasons of substantial public interest and under our regulatory obligations to share information relating to serious misconduct with third parties such as the charity commission, the disclosure and barring service or professional associations. Where there is a requirement to do this without your consent, we will always ensure that we have undertaken the appropriate assessments to ensure that this sharing is lawful. In cases where there is no requirement to refer information to another organisation without your consent, for example when referring information to a medical professional for an occupational health assessment, referrals will only be made with your consent.
- **To process payments such as wages or expenses:** If for example you are eligible to reclaim expenses associated with your role, we will process information about any expenditure including amount and type of expense, as well as your name and bank account details, to determine whether your expenses should be refunded and to make any resultant payment to you.

If your application is unsuccessful, please refer to the 'How long we keep your data for' section below.

How we use your data when using our website

When you visit our website and use our online resources, we may use cookies (and similar technologies such as tags) to make the website work. We also use optional cookies to analyse the effectiveness of our content and advertising.

When you first visit our website, we will ask for consent to set any cookies (and to process any personal data collected by those cookies) which are not strictly

necessary to make our pages work. Please see our [Cookie Policy](#) for further information and to change your preferences.

If you consent to performance cookies, our website uses the MonsterInsights Lite plug-in for Wordpress to measure how the website is performing and to find out how different features are used so that we can improve them.

Our website also includes a form you can use to contact us for advice or to ask about volunteering or employment opportunities. Personal information you share with us using these forms will be processed in accordance with the 'How we use your data for advice' and 'How we use your data when applying to work or volunteer' sections above.

When you visit our premises

We keep a record of visitors to our offices for the purposes of security and fire safety. This record is in physical, paper form. It includes your name, your employee/organisation if you are visiting from an external organisation, and the times you entered and left the building.

Our premises also have CCTV installed for their security, to protect yourself and our own staff or volunteers. CCTV footage will only be viewed when necessary (for example to detect or prevent a crime) and is only stored on a temporary basis, other than where it has been flagged for review.

We have a legitimate interest to process this information for the purposes set out above.

This data will not be shared with third parties unless we are legally required to do so due to having a Substantial public interest, for example as part of our safeguarding obligations to protect a child or vulnerable individual or to prevent a serious crime.

For information on how this data retained and for how long please refer to the 'How long we keep your data' section below.

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](#).

For information about how long we store data in local records, please see our [Data Retention Policy](#).

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
Micro Technology Solutions (MTS)	MTS provide IT support to NWCA staff and volunteers. While doing so they have access to devices which may hold client data and our Sharepoint system which holds staff and volunteer data. Under the terms of our data sharing agreement they do not access or retain any of this data.
CA Plus	CA Plus processes NWCA staff and volunteer data for the purpose of calculating and paying wages and expenses.

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 admin@nwcab.org.uk. If you are unable to email, please speak to staff at our local offices.

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 admin@nwcab.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 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