



# Privacy Policy

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## Introduction

At Citizens Advice Wandsworth 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 us. We're 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.

We will collect this data in different ways depending on how you approach our service, for instance whether you call us, visit our offices or contact us online.

We also receive information from partner organisations through referral mechanisms. Where you are referred to us, you should be advised that you are being referred as well as what information we will be provided by our referral partners.

## What information we collect

When providing advice 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. This may include:

- your name - you can ask to remain unnamed but this may limit the advice we are able to provide
- contact details such as your address, phone number and email address
- profile information such as your date of birth and whether you have any accessibility requirements.

We will also collect any information about your issue which could help us provide you with advice which can include:

- information about your finances - for example your income, expenditure, debts, benefits or pension
- credit reports - we may get copies of your credit history with your permission
- details of the products or services you are having issues with
- details of your housing such as your rent, mortgage and housing conditions
- information about your health or disability
- details of any discrimination you face.

If you contact us by phone we will also record the phone call for training and monitoring purposes.

We may also ask you about your demographic information. This will not affect the advice you receive and will be used to understand more about our service. For more information see the section on statistical processing.

## What we use your information for

We use the information you give us to:

- provide you with advice, guidance and information
- stay in touch with you about the advice we are providing
- help with applications such as a debt recovery order or benefit claim
- training our staff and volunteers
- assess the quality of our advice
- investigate complaints or claims
- get feedback from you about our services

- help us improve our services
- address the root causes of the issue you are experiencing
- share stories about your experience, with your permission.

We may also record any unacceptable behaviour from clients if we deem this to cause disruption to our service or threaten the wellbeing of our staff, volunteers or any other person.

In some circumstances we may also use your information to carry out legal obligations, including for:

- safeguarding
- fraud prevention
- regulatory compliance.

In most cases when using data for this purpose we store your information on a secure case management system managed by national Citizens Advice. Some of your information may also be kept within our local IT systems and secure storage for paper documents.

## **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**

In addition to the categories of recipients below, we may also ask to refer you to another organisation who we think will be able to provide you with more support. We will ask your permission to make referrals.

### **Referral partners**

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.

Some established referral partners include:

- Trussell Trust - to issue you with a food bank voucher
- South West London Law Centre – if you need debt advice
- Fuel bank Foundation - to issue you with a fuel voucher.

## **Funders**

We share information with our funders in order to demonstrate that we are meeting the funding requirements. Information will normally only be shared in a de-identified manner unless you give us your permission to do so or we need to in order to investigate a quality issue, complaint or claim.

## **Regulators**

We are legally required to provide information to regulatory bodies in some circumstances. These include but are not limited to the Financial Conduct Authority, the regulator for financial and banking services.

## **Auditors**

We share information with our internal and external auditors to allow them to carry out audits to ensure that we are complying with our legal obligations and standards of best practice in how we run the organisation.

## **Banks, credit reference agencies and creditors**

We may also share your information with banks or creditors to help get information to assist in our advice. We will only do this with your permission or where we are legally required to do so. Information we share will be used for purposes including:

- getting a credit report to assist with financial enquiries
- understanding more about your income and expenditure
- understanding more about the debts you owe.

## **Employers or benefit providers**

We may also contact your employer or benefit provider to understand more about your income, we will only do this with your permission.

## Translation and interpretation services

We may share your information with a translation or interpretation service to enable us to communicate with clients who prefer communication in different languages.

## 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.   | <p>Establishment, exercise or defence of legal claims - where we are helping clients establish their legal rights.</p> <p>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.</p>   |
| Maintaining quality and standards                                  | Legitimate interests - we have a legitimate interest in ensuring that our service is run properly and that standards are maintained. | <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"> <li>• dishonesty, malpractice or other seriously improper conduct</li> <li>• unfitness or incompetence</li> <li>• mismanagement in administration.</li> </ul> |
| Safeguarding   | Public task - in complying with safeguarding obligations.  | Substantial public interest (Safeguarding of children and of individuals at risk).  |

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|----------------------------|---|---|
| Accessibility requirements | Legal obligation - we have legal obligations in accordance with the equalities legislation.   | Substantial public interest (statutory obligation) - obligations under equalities legislation.  |
| 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> | Substantial public interest - (preventing and detecting unlawful acts, preventing fraud, Suspicion of terrorist financing or money laundering). |

## Information about third party individuals

We may also gather information about you if you aren't one of our clients. We will do this if it is relevant to provide a client with advice. For example, to assist a client with a debt assessment we will need relevant financial information about members of their household.

## 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 carry out research and statistics using data from a number of sources including:

- client case data - we use client case information to carry out research and produce statistical information
- surveys and questionnaires - we carry out specific questionnaires and surveys to get data on specific topics
- focus groups and studies - we invite key stakeholders to take part in studies and discussions.

We will only contact you directly about research and feedback if you have given your permission for us to do so.

## What information we collect

We use a wide range of information which can include:

- information about the issues you sought advice or guidance about
- your demographic information such as what area of the country you live in, your age or any minoritised groups you identify with
- your opinions about our service or themes relevant to them such as benefits or housing.

## What we use your information for

We use our research and statistics to inform our campaigns and to improve our service. This includes work to promote equity, diversity and inclusion within our service and society as a whole. We will not use any of this data in a way that identifies you or to make a decision about you as part of our research unless you give us your permission to do so.

Sometimes we like to include real client stories in our campaigns, if we want to use your story in a way that you can be identified we will only do so with your permission.

In most cases when using data for this purpose we store your information on a secure case management system managed by national Citizens Advice. Some of your information may also be kept within our local IT systems and secure storage for paper documents.

## Who we share your information with

We will not share directly identifiable information about you outside of Citizens Advice unless you give your permission for us to do so.

We may from time to time share data sets with de-identified data with trusted partners to allow them to do their own research. For example we may share data sets with identifiers such as names, addresses, contact details removed with a trusted third party such as a university to help them do research which is in the public interest.

## Our lawful basis for using your information

| <b>Activity</b> | <b>Lawful basis for collecting personal data</b>   | <b>Lawful basis for collecting special category or criminal convictions data</b> |
|-----------------|--|--|
| EDI monitoring  | Legitimate interests - we have a legitimate interest in ensuring our services are being delivered in a fair way and reaching people from all | Substantial public interest - 'equality of opportunity or treatment'.            |



|                                   |   |                                     |
|-----------------------------------|---|-------------------------------------|
|                                   | backgrounds.  |                                     |
| Research, feedback and statistics | Legitimate interests - We have a legitimate interest to understand how our service is working and to understand the issues which underlie the problems people are facing. | Archiving, research and statistics. |
| Publishing client stories         | Consent   | Explicit consent                    |

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

This section covers how we use your data when you apply to work or volunteer with us. National Citizens Advice covers their use of data for this purpose in their [privacy notice](#).

### How we collect your information

We collect information about you through your job or volunteer application form. Your information is kept within our local IT systems and secure storage for paper documents.

Depending on the role we may also collect information through a Disclosure and Barring Service (DBS) check. You will be informed if such a check will be required for the role at application stage.

### What information we collect

We'll collect personal information such as name, address, telephone number and email address, previous job history and experience, qualifications, and any support needs you may have.

We'll also ask for diversity information like your gender, ethnicity and sexual orientation. You don't have to tell us this.

Where it's needed for the role, we might contact the DBS for a criminal record check. Once the DBS check is completed and you've received your certificate, we'd expect you to share this information with us as part of the background check process.

We may also ask for:

- references for your previous and current work
- 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 we can pay you
- details of your student loan if you're paying one back.

## What we use your information for

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

- check you've got the right skills for a role when you apply
- arrange an interview
- contact you to tell you the result of your application
- do checks when we make an offer, for example contacting your references or checking your right to work in the UK
- send you an offer letter or contract.

We'll treat any diversity information you give us as strictly confidential. We'll anonymise this information and only use it to look at trends. This means we won't look at your information individually or compare it to other people and we won't use it as part of the recruitment selection process.

## Who we share your information with

If you accept an offer to work for us we'll:

- get your permission to share your information with your references
- share your contact information with our occupational health provider.

We won't usually share your personal information with anyone else in a way that could identify you. In some rare situations we have to share your information, for example if:

- we're investigating a safeguarding issue
- the police ask for the information to help them investigate a crime
- a court orders us to share the information.

## Our lawful basis for using your information

| Activity             | Lawful basis for collecting personal data                       | Lawful basis for collecting special category or criminal convictions data                        |
|----------------------|---|--|
| Recruitment of staff | Legitimate interests - for assessing suitability of candidates. | Employment, social security, and social protection - for complying with legal requirements as an |

|                           |   |  |
|---------------------------|---|--|
|                           | <p>Contract - for entering an employment contract.</p> <p>Legal obligation - for carrying out legal checks as part of employment screening.</p>                 | <p>employer including DBS checks.</p>  |
| Recruitment of volunteers | <p>Legitimate interests - for assessing suitability of candidates.</p> <p>Legal obligation - for carrying out legal checks as part of employment screening.</p> | <p>Employment, social security, and social protection - carrying out DBS checks.</p> |

## How we use your data when using our website

Our [Cookie Policy](#) covers how we use your data when you visit our website and the section about advice above covers how we use your data when you contact us online.

## 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](#).

| Activity             | Purpose   | Retention  |
|----------------------|---|--|
| Advice case records  | General advice  | 6 years  |
|                      | Cases with historical significance  | 16 years   |
|                      | Cases with an increased risk of a legal claim                             | 16 years   |
|                      | Cases that form part of an active inquiry                                 | 16 years or until the closure of the inquiry, whichever is longest |
| Complaints           | General complaints  | 6 years  |
|                      | Complaints involving a financial claim or court action involving insurers | 16 years   |
| Information requests | Information requests under Data Protection or Freedom of Information Law  | 6 years  |

|                       |  |                                    |
|-----------------------|--|------------------------------------|
| Safeguarding concerns | Any concerns relating to the safeguarding of children or vulnerable adults | 16 years                           |
| Donations             | General donation records   | 7 years from end of financial year |
|                       | General donation records   | 7 years from end of financial year |
|                       | Legacies, Wills, Bequests  | 7 years from closure of estate     |

## 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 |
|--------------------|--------------------------------------|-----------------------|
| 123 Reg            | Website hosting and storage          | UK                    |
| Cygnit IT Services | IT support                           | UK                    |
| Google             | Web analytics                        | EEA                   |
| PeopleHR           | HR platform for staff and volunteers | UK                    |
| Microsoft          | Email and document management system | UK & EU               |
| Refernet           | Local referral partnership           | UK                    |

## 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 contacting us by phone, online or by visiting one of our offices: [www.cawandsworth.org/get-advice](http://www.cawandsworth.org/get-advice).

## Raising a concern about how we use your information

If you are concerned about how we have handled your personal information please contact us: [www.cawandsworth.org/get-advice](http://www.cawandsworth.org/get-advice).

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.