

# **Citizens Advice West Berkshire**

## **Privacy Policy**

At Citizens Advice West Berkshire, 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.

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, Citizens Advice West Berkshire. Citizens Advice West Berkshire 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

We will collect your information when you contact us for advice, whether in person, by phone, or through our online enquiry form. We do this to provide you with support and to improve our services.

If you wish to remain anonymous, your case can be recorded without any personal information, but this may limit the level of support that we can provide, such as being able to act on your behalf.

### What information we collect

At Citizens Advice West Berkshire, we collect only the information necessary to provide advice and support. This includes:

- **Basic personal details** – such as your name, contact details, and date of birth.

- **Details about your enquiry** – including information about your circumstances, such as finances, housing, employment, and benefits.
- **Special category data** – such as health information, ethnicity, or other sensitive details, but only when relevant to your case and processed under a lawful basis (such as substantial public interest or legal claims).
- **Third-party information** – where you have given us permission to contact or liaise with other organisations on your behalf (e.g., housing providers, creditors, or government agencies).

We do not routinely collect information beyond what is covered in the national Citizens Advice privacy policy.

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

We use your information to provide advice and support on a range of issues, including benefits, debt, housing, employment, consumer rights, and other legal matters. This allows us to:

- Offer accurate and tailored advice based on your circumstances.
- Act on your behalf when needed, such as contacting organisations or submitting applications.
- Identify wider issues affecting our clients and improve our services.
- Meet our legal and funding obligations, including reporting anonymised data to funders.

We only use your information when necessary and in line with data protection laws.

### **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

We may share your information when referring you to a third-party organisation to help you with your problem. Before we do this, we will always obtain your consent.

With your consent, and to help you with your problem, we may share information with organisations such as:

- the local council
- housing associations
- creditors
- government agencies such as DWP and HMRC
- local charities such as the food bank or Community Furniture Project
- solicitors

We also share anonymised information with our funders.

## Our lawful basis for using your information

We process your personal information under the following lawful bases:

- **Legitimate interests (Article 6(1)(f) UK GDPR)** – to provide advice, information, and support in line with our charitable aims.
- **Public task (Article 6(1)(e) UK GDPR)** – where we deliver advice that is part of a statutory function, such as consumer advice.
- **Legal obligation (Article 6(1)(c) UK GDPR)** – where we are required to comply with the law, such as safeguarding or fraud prevention.
- **Consent (Article 6(1)(a) UK GDPR)** – where required, such as for direct marketing or sharing your details with third parties.

For special category data, we rely on:

- **Establishment, exercise, or defence of legal claims (Article 9(2)(f) UK GDPR)** – when advising on legal rights such as housing, benefits, or debt solutions.
- **Substantial public interest – statutory basis (Article 9(2)(g) UK GDPR)** – when delivering advice required by law, such as consumer service functions.
- **Substantial public interest – provision of confidential counselling, advice, or support (Article 9(2)(g) UK GDPR)** – when providing welfare-focused advice that is not based on legal rights.

We only collect and process your information when necessary and always in accordance with 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

We collect information for research, feedback, and statistical purposes in the following ways:

- **Client feedback forms** – when you choose to provide feedback about our service.
- **Anonymised case data** – extracted from our case management system to identify trends and improve service delivery.

We use anonymised data for research, feedback, and statistical purposes. If any personal details are involved, we ensure compliance with data protection laws and provide appropriate choices where necessary.

### What information we collect

For research, feedback, and statistical purposes, we may collect:

- **Feedback on our services** – through surveys or online feedback forms.
- **General demographic data** – such as age group or location, to assess service reach.
- **Service outcomes** – anonymised case details used to improve service delivery.

We do not collect any additional personal or sensitive data for these purposes unless you provide explicit consent.

### What we use your information for

We use your information for research, feedback, and statistical purposes to:

- Improve our services based on client feedback.
- Identify trends in advice needs to shape future support.
- Report anonymised data to funders and stakeholders to demonstrate impact.
- Contribute to national Citizens Advice research and policy work.

All data used for these purposes is anonymised where possible, and personal details are only included with your explicit consent.

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

We only share data for research, feedback, and statistical purposes in an anonymised format. This may include:

- Funders and stakeholders – to demonstrate the impact of our services.
- National Citizens Advice – to contribute to wider research and policy work.
- Regulatory bodies – where required for compliance or service evaluations.

We only share anonymised data for research and reporting purposes. If any identifiable personal data is involved, we ensure that appropriate safeguards are in place.

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

We process data for research, feedback, and statistical purposes under the following lawful bases:

- **Legitimate interests (Article 6(1)(f) UK GDPR)** – to assess and improve our services, ensuring we meet client needs.
- **Substantial public interest – research and statistics (Article 9(2)(j) UK GDPR)** – when processing special category data in an anonymised format for reporting and policy work.

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

## How we collect your information

When you apply to work or volunteer with us, we collect your information in the following ways:

- Directly from you – through application forms, CVs, and supporting documents.
- Through interviews and assessments – as part of the selection process.
- From third parties – such as referees and, where applicable, Disclosure and Barring Service (DBS) checks.

All information is collected and processed securely in line with data protection laws.

## What information we collect

When you apply to work or volunteer with us, we may collect:

- **Personal details** – such as your name, contact information, and date of birth.
- **Employment and education history** – including CVs, qualifications, and relevant experience.
- **References** – from previous employers or other referees.
- **Criminal record checks** (if applicable) – via the Disclosure and Barring Service (DBS) for certain roles.
- **Equalities monitoring data** – such as ethnicity or disability status (optional and anonymised for reporting).

We only collect the information necessary for recruitment and selection, and all data is handled securely.

## What we use your information for

We use your information to:



- Assess your suitability for the role you have applied for.
- Process your application and contact you about the recruitment process.
- Conduct necessary background checks, such as references and DBS (if required for the role).
- Ensure diversity, equity, and inclusion in our recruitment process (using anonymised data for monitoring).
- Comply with legal and regulatory requirements related to employment and volunteering.

We only use your information for recruitment purposes and handle it securely in line with data protection laws.

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

We only share your information when necessary and in line with data protection laws. This may include:

- Referees – to verify your employment or character references.
- Disclosure and Barring Service (DBS) – if a background check is required for your role.
- Regulatory bodies – where required by law or for compliance purposes.

We do not share your information with any third parties for marketing or unrelated purposes. All data is handled securely and only shared when necessary for the recruitment process.

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

We process your information for recruitment under the following lawful bases:

- **Legitimate interests (Article 6(1)(f) UK GDPR)** – to assess applications and manage the recruitment process.
- **Legal obligation (Article 6(1)(c) UK GDPR)** – where required by law, such as verifying the right to work or conducting DBS checks.
- **Contract (Article 6(1)(b) UK GDPR)** – if processing is necessary to enter into an employment or volunteer agreement.

For special category data, we rely on:

- **Substantial public interest – equality of opportunity (Article 9(2)(g) UK GDPR)** – for diversity monitoring and compliance with equalities legislation.
- **Substantial public interest – regulatory requirements (Article 9(2)(g) UK GDPR)** – for roles requiring DBS checks.

We only collect and process the information necessary for recruitment and handle it securely in line with data protection laws.

# How we use your data when using our website

## What information we collect

When you use our website, we may collect:

- **Technical data** – such as your IP address, browser type, and device information.
- **Usage data** – including pages visited and time spent on our site.
- **Information submitted through online forms** – such as enquiry or feedback forms.
- **Cookie data** – to enhance website functionality (see our cookie policy for details).

## How we collect your information

We collect information through:

- **Cookies and analytics tools** – to understand how visitors use our website.
- **Online forms** – when you submit an enquiry or provide feedback.
- **Website logs** – for security and performance monitoring.

You can control cookie settings through your browser.

## What we use your information for

We use website data to:

- Improve website functionality and user experience.
- Respond to online enquiries and feedback.
- Monitor and protect website security.
- Analyse usage trends to improve our services.

## Who we share your information with

We do not sell or share website data for marketing purposes. However, we may share limited technical data with:

- **Website hosting and IT providers** – for maintenance and security.
- **Analytics services** – to track website performance (data is anonymised).
- **Regulatory bodies** – if required by law for security or compliance reasons.

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

We process website data under the following lawful bases:

- **Legitimate interests (Article 6(1)(f) UK GDPR)** – to ensure website security, improve user experience, and analyse site performance.
- **Consent (Article 6(1)(a) UK GDPR)** – for non-essential cookies and analytics, where user consent is required.

Where applicable, we provide users with options to manage their cookie preferences.

### **How we use cookies on our website**

Cookies are small text files stored on your device when you visit our website. Users can manage cookie preferences via their browser settings or through the cookie banner on our website.

We use cookies to:

- **Ensure website functionality** – allowing essential features to work properly.
- **Improve user experience** – remembering your preferences and settings.
- **Analyse website performance** – using anonymised data to understand how visitors use our site.

### **Types of cookies we use:**

- **Necessary cookies** – required for the website to function (cannot be disabled).
- **Analytics cookies** – help us improve our website by collecting anonymous usage data.
- **Preference cookies** – store user settings for a better experience.

You can manage cookie preferences through your browser settings. For more information, see the ICO's guidance on cookies.

## 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](#).

### How long we keep your data for

We keep your data only for as long as necessary to fulfil the purpose for which it was collected, in line with data protection laws. National Citizens Advice is responsible for managing joint client case records – please refer to their privacy notice for more details.

Below is an overview of the data we hold locally, its purpose, and retention periods:

We securely delete or anonymise data once the retention period expires unless there is a legal requirement to keep it longer.

Data	Purpose	Retention
<b>Client enquiry forms</b>	To provide advice and support	Stored securely for up to 6 months before deletion
<b>Online enquiries</b>	To log and respond to client enquiries	Stored securely for up to 15 days (by Barkweb Ltd)
<b>Feedback forms</b>	To assess and improve our services	Anonymised after 12 months
<b>Recruitment records</b>	Processing job and volunteer applications	12 months after decision, unless retained for legal purposes

Data	Purpose	Retention
<b>DBS and background checks</b>	For roles requiring legal vetting	Retained in line with DBS guidelines (usually 6 months)
<b>Complaint records</b>	Investigating and responding to complaints	Retained in line with legal and regulatory requirements, typically up to 6 years.
<b>Website usage data (cookies)</b>	Site performance and analytics	Depends on cookie type – session cookies expire when you close your browser, others may last up to 12 months

## 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
Apogee Solutions Limited	Provides IT support and consultancy, managed IT services, VoIP communications, cloud services, and cybersecurity.	United Kingdom
Barkweb Ltd ('The Provider')	Provides online enquiry logging and response management services on behalf of Citizens Advice West Berkshire.	United Kingdom
Websquared	Provides website design, development, and hosting services for our online presence.	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 [enquiry@cawberks.org](mailto:enquiry@cawberks.org).

### 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 [enquiry@cawberks.org](mailto:enquiry@cawberks.org).

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