

1.9.1 Citizens Advice Basingstoke Privacy Policy

Ownership:	Citizens Advice Basingstoke
Date Issued:	New policy approved by the Board 17 April 2025
Document History: Date/Initials:	Amendments approved by the Board 29 January 2026
Last Review Date:	January 2026
Review Frequency:	Annually

Citizens Advice Basingstoke Privacy Policy

At Citizens Advice Basingstoke, 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 Citizens Advice Basingstoke. Citizens Advice Basingstoke 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 collect data in line with [Citizens Advice privacy policy](#).

What information we collect

To see what information we collect generally see [Citizens Advice privacy policy](#).

What we use your information for

To find out what we use your information for generally, see [Citizens Advice privacy policy](#).

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 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. These partners will be separate Data Controllers and for information on how they will process your data you should refer to their privacy notices. For example, but without limitation, we may share information with Basingstoke and Deane Borough Council, Hampshire County Council, creditors, housing association(s), solicitor(s), DWP and the foodbank.

You will also find further information on other organisations National Citizens Advice may share your data with within their [privacy notice](#) and their section on [Third Party Processors](#).

Our lawful basis for using your information

We use a number of different conditions to process data, depending on the purpose, which are shown in the table below:

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.

Activity	Lawful basis for collecting personal data	Lawful basis for collecting special category or criminal convictions data
Accessibility requirements	Legal obligation - we have legal obligations in accordance with the equalities legislation	Substantial public interest (statutory obligation) - obligations under equalities legislation.
Maintaining quality and standards	Legitimate interests - we have a legitimate interest in ensuring that our service is run properly and that standards are maintained	Establishment, exercise or defence of legal claims Substantial public interest (protecting the public against dishonesty etc) - where we are carrying out functions to protect against: - dishonesty, malpractice or other seriously improper conduct - unfitness or incompetence - mismanagement in administration
Safeguarding	Public task - in complying with safeguarding obligations	Substantial public interest (Safeguarding of children and of individuals at risk)
Fraud prevention	Legitimate interests - we have a legitimate interest in defending against fraudulent activity Legal obligation - in some circumstances there are legal obligations to disclose actual or suspected cases of fraud	Substantial public interest - (preventing and detecting unlawful acts, preventing fraud, Suspicion of terrorist financing or money laundering)

International Transfers

Basingstoke Citizens Advice process data only in the UK or European Economic Area (EEA), whom the UK Government recognise offer a similar level of data protection.

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 in line with [Citizens Advice privacy policy](#). We use local feedback forms to collect information, as well as communications from the public and clients.

What information we collect

As above, we collect information in line with [Citizens Advice privacy policy](#). We enquire about ways in which we can improve, take information from complaints and compliments and messages from social media.

What we use your information for

To improve our services to our community, ensure that we are aware of and can influence decision makers and publicise our impact to funders and stakeholders.

Who we share your information with

Information is anonymised. We commonly share information of this nature with funders, stakeholders and within our established networks. We sometimes share personal data with your permission.

Our lawful basis for using your information

We use a number of different conditions to process data, depending on the purpose.

Activity	Lawful basis for collecting personal data	Lawful basis for collecting special category or criminal convictions data
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 backgrounds	Substantial public interest - 'equality of opportunity or treatment'.
Research, feedback and statistics	Legitimate interests - We have a legitimate interest to understand how our service is working and to understand the statistics issues which underlie the problems people are facing	Archiving, research and
Publishing client stories	Consent	Explicit consent

How we use your data when applying to work or volunteer

How we collect your information

We collect your information via application forms, via interview and via references and enrollment forms.

What information we collect

We collect data on contact details and preferences, life experiences, conflicts of interest, emergency contact details and special category data as related to EDI considerations, reasonable adjustments and emergency planning.

What we use your information for

We use this information to ensure that our recruitment processes are fair and in the interests of both parties. We also use it to ensure that we are as inclusive as possible.

Who we share your information with

We share information with referees and when we're asked to provide a reference. Where appropriate, information may also be used for DBS checks. We also use anonymised data to share EDI characteristics of our team with funders and our national organisation.

Our lawful basis for using your information

We use a number of different conditions to process data, depending on the purpose.

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 Contract - for entering an employment contract Legal obligation - for carrying out legal checks as part of employment screening	Employment, social security, and social protection - for complying with legal requirements as an employer including DBS checks
Recruitment of volunteers	Legitimate interests - for assessing suitability of candidates Legal obligation - for carrying out legal checks as part of employment screening	Employment, social security, and social protection - carrying out DBS checks

How we use your data when using our website

What information we collect

We collect information on the pages visited and routes through the website.

We also collect personal client data when our website enquiry form is completed. See section 'How we use your data for advice' section above.

How we collect your information

Via cookies. Users are able to opt out of preferences, statistics and marketing cookies. They are unable to opt out of necessary cookies which are essential for the website to function properly.

As above, we also collect personal client data when our website enquiry form is completed. See section 'How we use your data for advice' section above.

What we use your information for

To help us keep our website up to date and relevant for users.

Completed website enquiry forms are used to provide advice. See section 'How we use your data for advice' section above.

Who we share your information with

We share anonymised website information with funders and stakeholders where required.

Our lawful basis for using your information

We have legitimate interest to carry out statistical analysis and research.

For website enquiry forms, see section 'How we use your data for advice' section above.

How we use cookies on our website

A cookie is a small text file that is downloaded onto 'terminal equipment' (eg a computer or smartphone) when the user accesses a website. It allows the website to recognise that user's device and store some information about the user's preferences or past actions. We use Google Analytics / Google CAPTCHA. We do this to make sure the website works well and is functional.

The first time you visit our website and thereafter at suitable intervals, we ask you whether you consent to us storing a cookie on your device. If you want to disable, block or remove cookies, you can do this at any time.

Google Analytics Cookies:

<https://policies.google.com/technologies/partner-sites?hl=en-GB&gl=uk> Google Analytics collects first-party cookies, data related to the device/browser, IP address and onsite/app activities to measure and report statistics about user interactions on the websites and/or apps that use Google Analytics. Google Analytics uses IP addresses to derive the geolocation of a visitor, the browser type, referral source, length of visit and page views. Google Analytics uses only a portion of an IP address collected, rather than the entire address. Where we use Google Analytics Advertising Features, Google advertising cookies are collected and used to enable features like Remarketing on the Google Display Network. Google Analytics is unable to identify a personal profile; by visiting our website, Google Analytics cannot tell us who you are. If you would like to disable cookies on our website, please see the relevant information below:

Google Chrome:

<https://support.google.com/chrome/answer/95647?co=GENIE.Platform%3DDesktop&hl=en>

Internet Explorer:

<https://support.microsoft.com/en-gb/help/17442/windows-internet-explorer-delete-manage-cookies>

Firefox:

<https://support.mozilla.org/en-US/kb/delete-cookies-remove-info-websites-stored>

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](#).

Data	Purpose	Retention
For advice:		
Low risk: All client records apart from the high risk categories below.	Advice, information and guidance provision.	6 years
High risk: Any case that has been subject to a serious complaint, insurance claim or other dispute.	To be able to investigate complaints to defend against claims of malpractice or negligence.	16 years Any case relating to building works or surveyors' reports on the purchase of property or relating to property. Any case which Citizens Advice consider to be a substantial risk, where the sums of money involved are, for example, in excess of £10,000 or where the advice given was especially complex, or where Citizens Advice are otherwise concerned that the case is unusual.
When applying to work or volunteer:		
Application forms/interview notes for paid and volunteer staff (including unsuccessful applications)	Completion of recruitment process	1 year from completion of recruitment process
Cookies:		
Cookies	Allows the website to recognise the user's device and store some	2 years from the user's last visit.

Data	Purpose	Retention
	information about the user's preferences or past actions. We do this to make sure the website works well and is functional.	

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
LFM	Payroll	Basingstoke
Digital House	Website hosting and maintenance	Basingstoke

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 advice@basingstokecab.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 complaints@basingstokecab.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