Citizens Advice Torfaen Privacy Policy

At Citizens Advice Torfaen, 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 Torfaen. Citizens Advice Torfaen 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.

We will collect this data in different ways depending on how you approach our service, including:

- face to face - for example by discussing your situation with an advisor
- completing a form - this could be a digital form or paper form
- over the phone - for example by calling Adviceline or a local office directly
- email

- webchat

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

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.

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.

You may also be asked to provide demographic information at your advice session. 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

To find out how we use your information, see our national Citizens Advice privacy policy. The main reason we ask for your information is to help solve your problem.

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 Citizens Advice, 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

Our confidentiality policy

At Citizens Advice Torfaen 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 any such referral.

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
- Fuel bank foundation - to issue you with a fuel voucher
- Charis - to issue 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:

- Ofgem - the regulator for gas and electricity
- Ofcom - the regulator for the broadcasting, telecoms and postal industry
- the Financial Conduct Authority - the regulator for financial and banking services
- the Legal Services Board
- Trading Standards

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

Our purpose for which we collect your information is advice, information and guidance provision. Our lawful bases for processing your information are set our in Article 6 of the UK GDPR (e) **public task** - the processing of personal data is necessary for us to perform a task in the public interest or for official functions and we have a clear basis in law (for example in relation to our Consumer Service which provides a statutory function) and; (f) **legitimate interest** - the processing of person data is necessary for legitimate interests of the legitimate interest of a third party. We have carried out a Legitimate Interests Assessment.

Our purpose of collecting and processing special category data is outlined in Article 9 UK GDPR.

Article 9 (2)(f) - establishment, exercise or defence of legal claims where the processing relates to the establishment or defence of legal claims including legal rights. For example in relation to a benefits claim or appeal.

Article 9(2)(g) - substantial public interest (statutory) advice, information or guidance relates to a statutory function. For example in our Consumer Service.

Article 9(2)(g) - substantial public interest (confidential counselling, advice or support) where our advice, information or guidance relates to confidential wellbeing support. For example if we are supporting you with safeguarding concerns.

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

- Sign a paper client details form
- Tick a box online
- Give agreement over the phone

What information we collect

- 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

To carry out our legitimate aims and goals as a charity – for example, to create statistics for our national research.

To improve our services as a result of feedback.

To respond to feedback and/or complaints.

To provide case studies to our funders to show the impact of our work. These will always be anonymised, unless we have received your permission to share your personal details.

Who we share your information with

We may share anonymised information with our funders for research and statistical reporting purposes, we will not share your personal information without consent.

With National Citizens Advice for the purpose of research and campaigning.

Our lawful basis for using your information

Our purpose for which we collect your information is advice, information and guidance provision. Our lawful bases for processing your information are set out in Article 6 of the UK GDPR (f) **legitimate interest** - to carry out our legitimate aims and goals as a charity. We have a legitimate interest to investigate complaints and to implement lessons learned.

Where we seek to publish client stories in an identifiable format, we will always get consent.

How we use your data when applying to work or volunteer

How we collect your information

We collect information through the online application process on our HR system Evalu8.

What information we collect

- We collect information about you through your job or volunteer application form. For jobs at Citizens Advice you will complete a job application on our recruitment advert on Evalu8.
- 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 we use your information for

When we record and use your personal information we:

- only access it when we have a good reason
- only share what is necessary and relevant

- don’t sell it to commercial organisations

We need to record some of the information you give us about yourself. We have a legitimate interest to do this, and it also helps us to perform the contract between us.
It enables us to support you with your learning, to communicate organisational information and to help you in your role

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, Health Management

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

We sometimes share anonymous statistics with organisations we trust so they can analyse the information.

Our lawful basis for using your information

Activity	Our lawful basis for collecting personal data	Our 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

The ICO has more information on employment processing.

How we use your data when using our website

What information we collect

When you use our website we may collect information about you. This can include information:

- that you provide directly to us in forms
- about how you use our website

How we collect your information

As well as data that you give us directly through a form, we use technology called cookies to gather information about how you're using our website - for example, what pages you click on and what device you're using. This helps us improve your experience of our website.

What we use your information for

We use information about how you use our website in order to improve our services and inform our campaigns.

Our lawful basis for using your information

We don't share any website user information with any external organisation apart from our third party processors, who only use the data on our behalf.

Activity	Our lawful basis for collecting personal data	Our lawful basis for collecting special category or criminal convictions data
Website use monitoring	Legitimate interests	N/A
Template creation	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.
Sending newsletters and press releases	Legitimate interests	N/A
Preventing malicious users of webchat	Legitimate interests	N/A

How we use cookies on our website

When you browse our website, we collect 'cookies' to help us understand more about how our site is used by visitors, and to develop and improve our services to you.

A 'cookie' is a bit of information kept on your computer. It tells us things like what device you're using and what pages you click on.

We use cookies to:

- track aspects of your visits, including the length of your visit, your browser, geographic location and the use of the search facility on this website
- remember the contrast and/or text resizing style preferences you've chosen for this website – if relevant

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
Advice Case Record	General Advice	6 years
Advice Case Record	Consumer Advice	6 years
Advice Case Record	Cases with historical significance	16 years
Advice Case Record	Cases with an increased risk of a legal claim	16 years
Advice Webchats	Chats with an advisor online	13 months
Call Recordings	Advicelink/Consumer Calls	6 months
Complaints	General Complaints	6 years
Complaints	Complaints involving a financial claim or court action involving insurers	16 years
Donations	General Donation Record	7 years from end of financial year
Information Requests	Information requests under Data Protection or Freedom of information law	6 years
Safeguarding Concerns	Any concerns relation to the Safeguarding of children or vulnerable adults	16 years

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
Google	Our email and document management system	UK
LiveEngage	Webchat Service	UK
Connect	Call Recordings	UK
SurveyMonkey	Forms	UK
Indeed	Recruitment Platform	UK
Refernet	Referral Service	UK
Skedda	Appointment booking system	UK
B&Q	Client Orders	UK
Amazon	Client Orders	UK
Orbits	Hold our IT register and training portal	UK
Charis	Issue Fuel Vouchers	UK
Trussell Trust	Issue Fuel Vouchers	UK
Fuelbank Foundation	Issue Fuel Vouchers	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 emailing reception@catorfaen.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 mal.edgson@catorfaen.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

Privacy Policy	
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Version control

Version Number	Effective Date	Reason for Change	Amended by
1	1 Mar 25	New policy introduced following Citizens Advice ending its reliance on explicit consent for processing special category data	Rachel Parsons
	November 2025	Reviewed - No Change	Rachel Parsons
1	September 2026	Reviewed - No Change	Rachel Parsons