

## Motherwell & Wishaw Citizens Advice Bureau PRIVACY POLICY

At Motherwell & Wishaw Citizens Advice Bureau, we collect and use your personal information to help solve your problems, improve our services and tackle wider issues in society that affect citizens in Scotland.

We only ask for the information we need, let you decide what you're comfortable telling us, and explain why we need it. We also treat it as confidential.

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 anyone.

We handle and store your personal information in accordance with the law. If we need to record any sensitive information, we will get your consent to do so. You can withdraw your consent at any time by contacting:

Motherwell & Wishaw CAB  
90 Brandon Parade East  
Motherwell, ML1 1LY  
Freephone 0808 1969180  
[bureau2@motherwellcab.casonline.org.uk](mailto:bureau2@motherwellcab.casonline.org.uk)

### **Who's responsible for keeping your personal information safe?**

Citizens Advice Scotland and each individual bureau within the network are responsible for keeping your personal information safe and making sure we comply with data protection law. This means we are 'joint data controllers' of your personal information.

Each local Citizens Advice Bureau is an independent charity and along with Citizens Advice Scotland (CAS), is a member of the Scottish Association of Citizens Advice Bureaux (SACAB). This means we use your information for monitoring purposes, our research and campaigning work and to keep improving our service for citizens in Scotland.

### **Working on your behalf**

When you give us authority to act on your behalf, for example to help you with a Universal Credit claim, we may need to provide information to a third party (including but not limited to government and local agencies). Where we provide information to a third party we will first seek your express consent.

### **What happens if you visit our website? (only use if applicable)**

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 enhance 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. You do not have to accept the cookies in order to use the website but if you do:

We use cookies to:

- Track aspects of user visits, including the length of a user's visit, their browser, geographic location and the use of the search facility on this website
- Remember users selected contrast and/or text resizing style preferences for this website
- Record a user's video preferences for our videos viewed on this website.

### **When we would use your information without your permission**

At times we might need to use or share your information without your permission. If we do, we'll always make sure there's a legal basis for it. This could include situations where we have to use or share your information:

- To comply with the law, called '**legal obligation**' - for example, if a court orders us to share information
- To protect someone's life, called '**vital interests**' - for example, sharing information with a paramedic if a client was unwell at the bureau or one of our outreaches
- To carry out our aims and goals as an organisation, called '**legitimate interests**' - for example, to create anonymous case studies and statistics for our national research
- For us to carry out a task in the public interest or for our official functions, and the task or function has a clear basis in law, called '**public task**' - for example the Consumer Service
- To carry out a contract we have with you, called '**contract**' - for example, if you're an employee we might need to store your bank details so we can pay you
- To defend our **legal rights** - for example, to resolve a complaint that we gave the wrong advice.

### **What are my rights?**

You have rights under data protection law that relate to the way we process your personal data. More information on these can be found on the Information Commissioner's website. If you would like to exercise any of these rights, please contact:

Motherwell & Wishaw CAB  
90 Brandon Parade East  
Motherwell, ML1 1LY  
Freephone 0808 1969180  
[bureau2@motherwellcab.casonline.org.uk](mailto:bureau2@motherwellcab.casonline.org.uk)

### **You also have the right to raise your complaint to ICO**

You should complain to:  
Information Commissioners Office, 0303 123 1113

Your rights include:

- The right to access the personal information that we hold about you
- The right to ask us to correct any inaccurate personal information we hold about you
- The right to ask us to erase any information we hold about you, although this will only apply in certain situations due to us processing your data on the basis of 'legitimate interests'

- The right to restrict our processing of the personal information we hold about you.
- The right to receive personal information, which you have provided to us, in a structured commonly used and readable format.
- You are disputing the accuracy of the information we hold
- Where we no longer need to use the information but it is needed for legal claims

### **What we do with your information**

First and foremost, your information will be used to provide you with advice. In addition we share anonymised statistical data that we can use for research purposes to show the value and impact of our service to funders and others who are interested in our work, such as external auditors who want to make sure we are giving you high quality advice. We may also use it to refer you to any specialist services out with SACAB. A record of your case will be kept on our secure electronic case management system hosted by CAS. Employees of CAS or other Citizens Advice Bureaux in Scotland may access this record, where necessary, in order to provide advice seamlessly across the Scottish network of Citizens Advice Bureaux.

Some of our services are also subject to external audit by the Scottish Legal Aid Board (SLAB). They check that we are providing you with the highest quality of service and are allowed to access your information (if randomly selected) under the legal basis of 'public task'.

How we handle your personal information depends on how you interact with us.

We'll seek your permission to hold your data by asking you:

- To verbally agree
- To tick a box online; or
- Directly by post, electronically (email or webchat) or over the phone.

If you call us, we may record the conversation for training and monitoring purposes.

If you've been referred to us from another advice charity or organisation, they'll send us your information using a referral form. They should get your permission before sending us your information.

### **What information we ask for**

We'll only ask for information that's relevant to your problem. Depending on what you want help with, this might include:

- 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. If you do not want us to record and use your information, we can help you as best we can, but advice will be limited and general rather than specific to your circumstances.

### **How we use your information**

The main reason we ask for your information is to help solve your problem. We only access your information for other reasons if we really need to - for example:

- For training and quality purposes
- To investigate complaints
- To help us improve our services.

We might use your contact details to get in touch about your experience of our service or ask you to take part in surveys or research - we'll only do this if you give us permission.

We use some information to create statistics about who we're helping and what issues they face. This information is always anonymised - you can't be identified.

We share these with funders, regulators, government departments and publicly on our blogs, reports, social media and press releases. The statistics also inform our policy research, campaigns, or media work.

### **When we share your information with other organisations**

With your permission, we might share your information with other organisations to help solve your problem or to monitor the quality of our services.

Organisations we share your data with must store and use your data in line with data protection law. If you ask us to act on your behalf we might need to share some of your information with other organisations - we'll always tell you when we do this. For example if we contact your energy provider about problems you are having with your energy bills, we might need to share your name, address and account details with them.

If we refer you to another organisation for more advice, we might share information about your problem with them so they can help you more quickly.

We might choose to use your information for research purposes on the basis of 'legitimate interest'. This means it will help us carry out our aims and goals as an organisation - for example, to create case studies and statistics for our national research. If we use it in this way, your personal details will be anonymised.

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

We may sometimes suggest that you go to another organisation as they may be able to help you with all or part of your issue. We will only make a referral and share your information with your consent. Organisations we share your information with must store and use it in line with data protection law.

### **If we're concerned about yours or someone else's safety**

If something you've told us makes us think you or someone you know might be at serious risk of harm, we could tell the police or social services - for example if we think you might hurt yourself or someone else.

### **Storing your information - if you contact us online, by phone or face to face**

Whether you get advice face to face, over the phone, by email or webchat, our adviser will log all your information, correspondence, and notes about your problem on our case recording system (CASTLE).

Some of your information might also be kept within our secure email and IT systems. We keep your information for 7 years. If your case has been subject to a serious complaint, insurance claim or other dispute we keep the data for 16 years.

**Changes to the privacy policy and your duty to inform us of changes**

We keep our privacy policy under regular review.

This version was created on 12/11/2021. It was reviewed in June 2023, but not revised. Historic versions can be obtained by contacting us.

It is important that the personal data we hold about you is accurate and current. Please keep us informed if your personal data changes during your relationship with us.

**Complaints on how we have used your data**

You should complain to:

Information Commissioners Office, 0303 123 1113

Created:	November 2021
Reviewed:	June 2023
Reviewed by:	Operations Lead and CEO
Next Review date:	June 2024