

Privacy Policy

At Citizens Advice Bromley, 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 Bromley. Citizens Advice Bromley 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

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

At times we might 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 - for example, if a court orders us to share information. This is called 'legal obligation'
- to protect someone's life - for example, sharing information with a paramedic if a client was unwell at our office. This is called 'vital interests'

- to carry out our legitimate aims and goals as a charity - for example, to create statistics for our national research. This is called 'legitimate interests'
- for us to carry out a task where we're meeting the aims of a public body in the public interest - for example, delivering a government or local authority service. This is called 'public task'
- to carry out a contract we have with you - for example, if you're an employee we might need to store your bank details so we can pay you. This is called 'contract'
- to defend our legal rights - for example, sharing information with our legal advisors if there was a complaint that we gave the wrong advice

We handle and store your personal information in line with the law - including the General Data Protection Regulation and the Data Protection Act 2018.

You can check our national Citizens Advice [privacy notice](#) for how we handle most of your personal information.

This page covers how we, as your local charity, handle your information locally in our offices.

For general advice and nationally funded advice programmes please see the national Citizens Advice [privacy notice](#).

How we collect your information

We collect data which you give us voluntarily. We use 'legitimate interest' as the basis for recording your name, address and contact details. You can find out how we collect your data for our core advice services, by looking at our national Citizens Advice [privacy notice](#)

What Citizens Advice Bromley asks for:

To find out what information we ask for, **see our national Citizens Advice privacy policy**

What we use your information for

To find out how we use your information we ask for, **see our national Citizens Advice privacy policy**

Working on your behalf

When you give us authority to act on your behalf, for example to help you with a welfare benefit claim or debt, we'll need to share information with that third party (for example, the DWP, the Council, your creditors).

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 also share your data with relevant third parties where necessary in order to assist you, or where the funder of the service we are assisting you under wants us to do so. We will always explain who we are sharing your data with and why we are sharing it. Organisations that we frequently share data with include Age UK Bromley & Greenwich, Bromley Mencap, Community Links Bromley, South East London Mind, London Borough of Bromley and NHS South East London (for cases under our Bromley Well Contract), Toynbee Hall and the Money Advice Service (for debt cases conducted under the Debt Free Advice project).

How we store your information

Details of your case are stored on our national Casebook case-recording system.

As part of our Bromley Well contract details of your case are stored on our Bromley Well case-recording system, Charitylog. Charitylog is owned by Dizons Limited. They are GDPR compliant and a copy of their privacy notice can be found [here](#).

As part of our Debt Free Advice partnership details of your case are stored on Toynbee Halls case-recording system, Advice Pro. They are GDPR compliant and a copy of their privacy notice can be found [here](#).

Our lawful basis for using your information

We use legitimate interests as the lawful basis for processing your information under UK GDPR Articles 6,9 & 10.

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 use your data for fundraising and donations

This section covers how we use your data to carry out our fundraising activities. National Citizens Advice covers their use of data for fundraising in their [privacy notice](#).

How we use your data when applying to work or volunteer

How we collect your information

Citizens Advice collects your information through your application forms and/or CV's.

Data is stored on our Microsoft 365 system.

What information we collect

Citizens Advice Bromley only collects and processes information that is relevant and necessary for recruitment. This includes:

- your name, address and contact details, including email address and telephone number, date of birth, sex
- details of your qualifications, skills, experience and employment history, including start and end dates with previous employers and your performance during the voluntary recruitment process
- data about your emergency contacts
- data about your nationality and entitlement to work in the UK
- data about your criminal record
- details of your schedule (days of work and working hours)
- details of training you have participated in
- data about medical or health conditions, including whether or not you have a disability for which Citizens Advice Bromley needs to make reasonable adjustments
- equal opportunities monitoring data, including data about your ethnic origin, sexual orientation, gender identity, health and religion or belief
- References

Citizens Advice Bromley collects this data in a variety of ways. For example, data is collected through:

Information collected directly from you, such as:

- application forms and/or CV's
- Personal Statements
- forms completed by you at the start of, or during, voluntary period
- correspondence with you

- interviews, meetings or other assessments

Information we have collected about you such as:

- References from previous employers

Data is stored in a range of different places, including in your employee record file in Citizens Advice Bromley 's HR management systems Breathehr and in other IT systems such as Casebook, Charitylog and systems e.g., Workspace or Microsoft 365.

What we use your information for

If we offer you a volunteering position, we'll ask your referees about your previous and current work and experience. We might contact the DBS for a criminal record check, if relevant. 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.

This information would include name, date of birth, place of birth, gender, position applied for and anything else disclosed on your DBS check.

How we use your information

We'll use the information you give us to decide whether or not you've got the right skills for the role.

We'll use the demographic information to make sure we're employing a diverse workforce and volunteer community.

Staff who access your information have had information protection training to make sure your information is handled sensitively and securely.

Who we share your information with

Citizens Advice Bromley shares your data with third parties in order to obtain references from other employers, and obtain necessary criminal records checks from the Disclosure and Barring Service for certain roles.

Our lawful basis for using your information

We use legitimate interests as the lawful basis for processing your information under UK GDPR Articles 6

How we use your data when using our website

Citizens Advice Bromley has tried to ensure that the information on this website is accurate. However, Citizens Advice Bromley will not accept liability for any loss, damage or inconvenience arising as a consequence of any use of or the inability to use any information on this website.

Citizens Advice Bromley endeavours to provide a service of the highest quality. However, we cannot guarantee that our service will be uninterrupted or error-free. We are not responsible for claims brought by third parties arising from your use of this website.

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How we use cookies on our website

When you use our website we collect your information in a number of ways. We use data called 'cookies' to get information about how you're using our website – for example, what pages you click on and what browser you're using. Find out more how we collect and use cookies when you browse our website below. We also collect information about you if you:

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 time you spend on individual pages on your visit, 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](#).

We keep records for 6 years. We may keep records for 16 years if the advice given could have serious consequences if it was not stored for a longer period.

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 data protection rights request you can do so by emailing CEO@citizensadvicebromley.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 CEO@citizensadvicebromley.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