

# Privacy Notices by Service



1. Client Services
2. Human Resources
3. Partners, Donors and Campaigners
4. CCTV

## 1. Client Services

Service area	Client Services
<p>The reasons we use your data</p>	<ul style="list-style-type: none"> <li>• Facilitate &amp; document; treatments, care, visits, contact and advice in accordance with our legal obligations and legitimate interests.</li> <li>• Investigate clinical incidents in accordance with the relevant standards and laws.</li> <li>• To obtain funding from the National Health Service (NHS) in accordance with our legitimate interests.</li> <li>• Process client feedback/surveys and complaints in accordance with our legitimate interests.</li> <li>• Record telephone calls for training and quality purposes in accordance with our legitimate interests.</li> <li>• Undertake research where you have given your explicit consent or where the data is anonymised.</li> <li>• Defend or administer legal proceedings.</li> </ul> <p><i>We may share your information with statutory agencies to prevent or detect crime or to promote safeguarding.</i></p>
<p>Legal basis for processing</p>	<p>The following lawful bases apply to the information we process about you:</p> <ul style="list-style-type: none"> <li>• Legitimate interests</li> <li>• Legal obligations (as set out below)</li> <li>• Explicit Consent</li> <li>• Legal claims</li> </ul> <p>BPAS is subject to numerous obligations, these include, but are not limited to:</p> <ul style="list-style-type: none"> <li>• Abortion Act 1968</li> <li>• The Abortion Regulations 1991</li> <li>• Medicines Act 1968</li> <li>• Health and safety legislation</li> <li>• Health services legislation &amp; standards</li> <li>• NHS England Serious Incident Framework (2015)</li> <li>• Charitable standards and laws</li> </ul>

Who we share your data with	<p><b>Where necessary:</b></p> <ul style="list-style-type: none"> <li>• NHS</li> <li>• Care Quality Commission (CQC)</li> <li>• An Official Ombudsman</li> <li>• Statutory agencies – such as the Police, the information commissioner's office (ICO), local authorities, governmental bodies and safeguarding bodies.</li> <li>• Our IT supplier for maintenance purposes</li> </ul>
When computers make decisions about you	There are no automatic decisions.
When your data gets sent to other countries	Data is not sent to other countries.

## 2. Human Resources

Service area	Human Resources
The reasons we use your data	<ul style="list-style-type: none"> <li>• To process your pay and related information</li> <li>• To manage your employment under our relevant statutory duties &amp; employment policies</li> <li>• to respond to statutory returns including equality returns</li> <li>• to process your employee benefits</li> <li>• to manage work-related health information</li> <li>• to process statutory deductions</li> <li>• to allow the administration of your personal pension</li> <li>• to allow for the transfer of budget information</li> <li>• to allow independent auditors to ensure that we are complying with our internal policies and processes</li> <li>• to allow you to access the relevant external training linked to your personal development</li> <li>• to determine your suitability for roles (for job applicants)</li> <li>• to undertake pre-employment checks should your employment application be successful (for job applicants)</li> <li>• to complete anonymised equalities statutory returns and to target future recruitment campaigns</li> <li>• To support or defend legal claims</li> </ul> <p><i>We may share your information with statutory agencies to prevent or detect crime or to promote safeguarding.</i></p>
Legal basis for processing	<p>We process your data in accordance with:</p> <ul style="list-style-type: none"> <li>• Our contractual obligations</li> <li>• Our legitimate interests and our substantial legitimate interests</li> <li>• Our legal obligations – under employment, equalities and health safety legislation</li> </ul>

Who we share your data with	<p>Both <b>internal &amp; external customers</b>, and <b>services users</b> will have access to information relating to you acting in your professional capacity. Disclosures will be balanced with our duty of confidence to you and your expectation of privacy.</p> <p><b>External organisations</b> such as;</p> <ul style="list-style-type: none"> <li>• H M Revenue &amp; Customs,</li> <li>• Disclosure and Barring Service,</li> <li>• H M Court Service,</li> <li>• Police Authority,</li> <li>• Department of Work and Pensions,</li> <li>• Pensions Administrators</li> <li>• External organisation linked to TUPE legislation.</li> <li>• HR System IT supplier Software-for-People</li> <li>• External employment lawyers (involved in staff litigation)</li> <li>• Our partners</li> </ul>
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### 3. Partners, Donors and Campaigners

Service area	Partners, Donors and Campaigners
How we collect your data	<p><b>Information you give us.</b> You may give us information about your identity, contact details, financial and/or transaction data and marketing &amp; communications preferences when you sign up to a newsletter, sign a petition or become an e-campaigner, join us at an event, training session or donate to us.</p> <p><b>Information we automatically collect about you.</b> We may automatically collect information about your profile if you share certain details with your social media platform or donation partner.</p> <p><b>Information we receive from other sources.</b> We may receive personal data about you from various third parties and public sources. For example, we may receive:</p> <ul style="list-style-type: none"> <li>• Technical data from analytics providers;</li> <li>• Contact, financial and transaction data from providers of technical, payment and delivery services;</li> <li>• Public sources of information on the internet based on what you do (journalists) or your opinions as they relate to our services, and</li> <li>• Identity and contact data from selected business partners, data brokers or aggregators.</li> </ul> <p>We may purchase lists of data from organisations, from time to time, that can provide data privacy records showing your consent for the use of this data by us. There may also be instances where people make purchases on your behalf and sign you up to our services or information. If this is the case then we will endeavour to contact you within thirty (30) days to let you know this has happened, and you can ask us to stop processing at this point. We may</p>

	also use your information if you have made this public, are over 18 and may have interacted with us.
The reasons we use your data	<ul style="list-style-type: none"> <li>• Process payments, claim gift aid and complete identity checks</li> <li>• Contact you regarding general BPAS information</li> <li>• To inform you about services &amp; campaigns</li> <li>• To fulfil purchases you have made from us</li> <li>• Promote engagement and fulfil BPAS' charitable aims</li> </ul>
Legal basis for processing	<p>We process your data in accordance with:</p> <ul style="list-style-type: none"> <li>• Our legitimate interests</li> <li>• Contractual obligations</li> <li>• Your Explicit Consent.</li> </ul> <p>NOTE: You can withdraw consent by contacting <a href="mailto:external-affairs-team@bpas.org">external-affairs-team@bpas.org</a></p>
Who we share your data with	<p><b>Google</b> - Google Analytics provide analytics data on the use of website and other digital interaction platforms. Their privacy policy can be found at <a href="https://support.google.com/analytics/answer/6004245?hl=en">https://support.google.com/analytics/answer/6004245?hl=en</a></p> <p><b>Microsoft</b> - Microsoft provide our email service and when you email us this will be controlled under: <a href="https://products.office.com/en-us/business/office-365-trust-center-privacy">https://products.office.com/en-us/business/office-365-trust-center-privacy</a></p> <p><b>More Onion</b> –More Onion manages BPAS petitions and email campaigns. More Onion act as a data processor which means we have a contract in place with them, that they cannot do anything with your personal information unless we have instructed them to do so, and that they will not share your personal information with any organisation apart from us. They will retain information securely on our behalf and retain it for the period we instruct.</p> <p><b>Mailchimp</b> - We use Mailchimp to send our marketing and campaign emails. Their privacy policy can be found here: <a href="https://mailchimp.com/legal/privacy/">https://mailchimp.com/legal/privacy/</a></p> <p><b>Facebook</b> - If you interact with us through Facebook then you will be subject to their privacy policy that can be found here: <a href="https://www.facebook.com/legal/FB_Work_Privacy">https://www.facebook.com/legal/FB_Work_Privacy</a></p> <p><b>Twitter</b> - If you interact with us through Twitter then you will be subject to their privacy policy that can be found here: <a href="https://twitter.com/en/privacy#update">https://twitter.com/en/privacy#update</a> and you can change your preferences here: <a href="https://twitter.com/personalization">https://twitter.com/personalization</a></p> <p><b>Instagram</b> - If you interact with us through Instagram then you will be subject to their privacy policy that can be found here: <a href="https://help.instagram.com/519522125107875?helpref=page_content">https://help.instagram.com/519522125107875?helpref=page_content</a></p> <p><b>YouTube</b> - If you interact with us through our You Tube channels then you will be subject to their privacy policy that can be found here: <a href="https://policies.google.com/privacy?hl=en-GB&amp;gl=uk">https://policies.google.com/privacy?hl=en-GB&amp;gl=uk</a></p>

	<p><b>JustGiving</b> - If you donate to us through Just Giving then you will be subject to their data privacy notice that can be found at: <a href="https://www.justgiving.com/info/privacy-policy-versions/privacy-policy-v20">https://www.justgiving.com/info/privacy-policy-versions/privacy-policy-v20</a></p> <p><b>VirginMoneyGiving</b> - If you donate to us through Virgin Money Giving, then you will be subject to their data privacy notice that can be found at: <a href="https://uk.virginmoneygiving.com/giving/terms/privacy-policy.jsp">https://uk.virginmoneygiving.com/giving/terms/privacy-policy.jsp</a></p> <p><b>Savoo</b> - If you donate to us through Savoo then you will be subject to their data privacy notice that can be found at: <a href="https://www.savoo.co.uk/info/the-legal-stuff/privacy/">https://www.savoo.co.uk/info/the-legal-stuff/privacy/</a></p> <p><b>HMRC</b> - If you allow us to reclaim GiftAid then we need to check your status with HMRC and apply for the tax rebate, when we do this we exchange information with HMRC and this data will be subject to their data privacy notice that can be found at: <a href="https://www.gov.uk/government/publications/data-protection-act-dpa-information-hm-revenue-and-customs-hold-about-you/data-protection-act-dpa-information-hm-revenue-and-customs-hold-about-you">https://www.gov.uk/government/publications/data-protection-act-dpa-information-hm-revenue-and-customs-hold-about-you/data-protection-act-dpa-information-hm-revenue-and-customs-hold-about-you</a></p> <p><b>Payment service provider / Bank</b> - If you donate to us; to process your payment, we may need to share information with our partners to process this payment.</p>
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#### 4. CCTV

Service area	CCTV
The reasons we use your data	BPAS or its partners may use footage to investigate incidents that have happened on or in the vicinity of BPAS premises. We may share your information with statutory agencies, to prevent or detect crime.
Who we share your data with	<p>We process CCTV footage in accordance with:</p> <ul style="list-style-type: none"> <li>• BPAS' legitimate interests</li> <li>• Health &amp; Safety legislation</li> <li>• The Protection of Freedoms Act 2012</li> <li>• The Surveillance Camera Code of Practice</li> <li>• The Data Protection Act 2018</li> <li>• The General Data Protection Regulations</li> <li>• Employment legislation</li> </ul>

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