

Privacy Notice by Service Area



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Responsible Team: Information Governance

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1. About This Notice

This privacy notice explains how we use your personal information at the British Pregnancy Advisory Service (BPAS).

It tells you what data we collect, why we collect it, how we use it, and who we may share it with. It also explains your rights and how to contact us if you have any concerns.

This notice is for everyone who uses or supports our services, including:

- Patients and clients
- Staff and volunteers
- Donors and campaigners
- Commissioners and partners
- Visitors to our clinics and website

We have written this notice to be clear, honest, and easy to understand. If anything is unclear or if you need this information in a different format, you can contact our Data Protection Officer at dataprotection@bpas.org.

We update this notice when needed to reflect changes in our services, the law, or your rights. The most recent version is always available at www.bpas.org/privacy-notice

2. How to Use This Notice

This privacy notice is divided into sections based on the different services and activities at BPAS.

You do not need to read the whole document. You can go straight to the section that applies to you.

Each section explains:

- What personal information we collect
- Why we collect it and how we use it
- The legal reasons we rely on
- Who we may share the information with
- How long we keep it
- Your rights and how to use them

If you use more than one BPAS service. For example, if you are both a client and a donor then you may want to read more than one section.

You can find the list of sections on the next page. If you are reading this online, you can click on the titles to go straight to that part of the notice.

Choose the section that most closely matches how you use or support our services.

Service Area	Section	Page
Abortion, Vasectomy and Sexual Health Services Information we collect and use to provide clinical care, including contraception, STI testing, and pregnancy choices.	3.1	Page 3
Booking and Online Services Data collected through call centres, website forms, online booking tools, and IP addresses.	3.2	Page 3
Advice, Counselling and Aftercare Support services before and after treatment, including emotional support, safeguarding, and helpline use.	3.3	Page 4
Research, Audit and Quality How we use personal data in research projects, audits, and service quality reviews.	3.4	Page 4
Feedback and Complaints How we manage complaints, compliments, surveys, and feedback.	3.5	Page 4
CCTV and Site Security Video recordings for safety and incident investigation at our clinics and offices.	3.6	Page 5
Employees and Volunteers Personal data used to manage our staff, job applicants, volunteers, and agency workers.	3.7	Page 5
Donors, Campaigners and Supporters Information collected for fundraising, campaigning, events, and mailing lists.	3.8	Page 5
Website, Cookies and Digital Media How we use cookies, website analytics, social media and online marketing tools.	3.9	Page 6
Corporate and Governance Records Personal data used in legal, regulatory, financial and board-level work.	3.10	Page 6

3. How We Use Your Information by Service Area

This part of the notice explains how we use your information in different areas of BPAS.

Each service area has its own table that shows what we collect, why we collect it, who we may share it with, and how long we keep it.

If you use more than one service, you may want to read more than one section.

3.1 Abortion, Vasectomy and Sexual Health Services

What we collect	Your name, contact details, date of birth, NHS number, GP information, medical history, consent forms, clinical notes, diagnostic results, safeguarding information.
Why we use it	To assess your needs, provide treatment, meet legal obligations, safeguard individuals, and report to commissioners and regulators.
Our legal basis	UK GDPR Article 6(1)(e) – public task; Article 9(2)(h) – provision of health care; Data Protection Act 2018 Schedule 1, Part 1.
Who we share it with	NHS commissioners, regulators (e.g. CQC), approved laboratories, safeguarding teams, emergency services if necessary.
How long we keep it	See our Records Retention Schedule for clinical record retention periods.
Overseas transfers?	No.
Automated decisions?	No.
Your rights	You have rights over your data. See Section 4.

3.2 Booking and Online Services

What we collect	Your name, date of birth, contact details, postcode, NHS number, GP details, IP address, and communication preferences.
Why we use it	To book appointments, direct you to the right service, confirm details, respond to queries, and protect our website. We also use IP addresses to detect and prevent fraud, diagnose technical issues, and analyse traffic patterns.
Our legal basis	UK GDPR Article 6(1)(e) – public task; Article 9(2)(h) – health care; IP data under Article 6(1)(f) – legitimate interests.
Who we share it with	NHS services, approved IT support providers, partner services where referrals are needed.
How long we keep it	Booking details are kept in line with our Records Retention Schedule. IP logs are short-term only.
Overseas transfers?	No.
Automated decisions?	No.

Your rights	You can ask to see, correct, or restrict how we use your data.
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3.3 Advice, Counselling and Aftercare

What we collect	Notes from counselling sessions, support contacts, safeguarding concerns, consent for contact, communications preferences.
Why we use it	To provide emotional support, follow-up care, and advice before or after treatment, and meet safeguarding obligations.
Our legal basis	UK GDPR Article 6(1)(e); Article 9(2)(h); Data Protection Act 2018 Schedule 1, Part 1.
Who we share it with	Safeguarding authorities, with consent or where legally required.
How long we keep it	See our Records Retention Schedule.
Overseas transfers?	No.
Automated decisions?	No.
Your rights	You can access or object to the use of your data. See Section 4.

3.4 Research, Audit and Quality

What we collect	Service data, audit samples, health outcomes, de-identified and in some cases identifiable data.
Why we use it	To evaluate service quality, support audit and research, and improve patient outcomes.
Our legal basis	UK GDPR Article 6(1)(e); Article 9(2)(j) – research purposes; Data Protection Act 2018 Schedule 1, Part 1.
Who we share it with	Academic institutions, NHS bodies, ethics-approved researchers (subject to data sharing agreements).
How long we keep it	In line with audit and research protocols and our retention schedule.
Overseas transfers?	Only with safeguards and approval under data sharing agreements.
Automated decisions?	No.
Your rights	Some rights may be limited under research exemptions. See Section 4.

3.5 Feedback and Complaints

What we collect	Comments, complaints, compliments, name and contact information if provided.
Why we use it	To investigate concerns, respond to feedback, and improve services.
Our legal basis	UK GDPR Article 6(1)(e); Article 9(2)(h) where health data is involved.

Who we share it with	Internal staff and, if needed, regulators (e.g. CQC).
How long we keep it	See Records Retention Schedule.
Overseas transfers?	No.
Automated decisions?	No.
Your rights	You can request a copy or correction. See Section 4.

3.6 CCTV and Site Security

What we collect	Video recordings from CCTV at BPAS sites.
Why we use it	To protect staff, clients, and property, and investigate incidents.
Our legal basis	UK GDPR Article 6(1)(f) – legitimate interests.
Who we share it with	Law enforcement or insurers where needed.
How long we keep it	Retained for a short period unless required for investigation.
Overseas transfers?	No.
Automated decisions?	No.
Your rights	You can request access to footage in some cases. See Section 4.

3.7 Employees and Volunteers

What we collect	Employment records, health checks, training records, DBS checks, payroll and pension details.
Why we use it	To manage employment, meet legal duties, and ensure workplace safety and development.
Our legal basis	UK GDPR Article 6(1)(b), (c), (f); Article 9(2)(b), (h); Employment laws.
Who we share it with	HMRC, pension providers, DBS, occupational health, payroll providers.
How long we keep it	See our Records Retention Schedule.
Overseas transfers?	No.
Automated decisions?	No.
Your rights	See Section 4 for employment data rights.

3.8 Donors, Campaigners and Supporters

What we collect	Contact details, donation history, Gift Aid records, campaign sign-ups, event attendance.
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Why we use it	To process donations, claim Gift Aid, and communicate about our work.
Our legal basis	UK GDPR Article 6(1)(a) – consent; Article 6(1)(c) – legal obligation (e.g. Gift Aid).
Who we share it with	HMRC (Gift Aid), trusted fundraising processors.
How long we keep it	Based on tax and fundraising guidance – see our retention schedule.
Overseas transfers?	No.
Automated decisions?	No.
Your rights	You can withdraw consent at any time. See Section 4.

3.9 Website, Cookies and Digital Media

What we collect	Cookies, IP addresses, browser type, device ID, social media engagement metrics.
Why we use it	To improve website performance, understand usage, deliver digital content, and ensure the security and functionality of our services.
Our legal basis	UK GDPR Article 6(1)(f) – legitimate interests; Consent via cookie banner.
Who we share it with	Website and analytics providers under contract.
How long we keep it	As per our Cookie Policy.
Overseas transfers?	Some analytics tools may store data outside UK – under appropriate safeguards.
Automated decisions?	No.
Your rights	You can update cookie settings at any time.

3.10 Corporate and Governance Records

What we collect	Names, job titles, minutes, contracts, policy documents, legal correspondence.
Why we use it	To manage contracts, legal duties, board meetings, insurance and risk.
Our legal basis	UK GDPR Article 6(1)(c) – legal obligation; Article 6(1)(f) – legitimate interests.
Who we share it with	Regulators, legal advisors, insurers, public bodies.
How long we keep it	See Records Retention Schedule.
Overseas transfers?	No.
Automated decisions?	No.
Your rights	Contact us if you believe your data appears in these records. See Section 4.

4. Appendices

Appendix A: Digital Systems & Platforms

We use a number of secure systems to support the delivery of our services. These systems are assessed for data protection, confidentiality, and cyber security compliance.

Examples include:

- Electronic patient records
- Online booking and call handling systems
- Website forms, chat tools and analytics
- Payroll and HR platforms
- Audit, survey and feedback tools
- Fundraising and supporter databases

We ensure these systems meet the standards required under the UK GDPR, the NHS Data Security and Protection Toolkit, and our internal Information Governance policies.

Appendix B: Glossary of Terms

These are some of the key terms we use in this privacy notice. We explain them in plain English to help make this document clear and easy to understand.

Term or Phrase	What It Means
<i>Anonymised data</i>	Information that has been changed so that it no longer identifies a person and cannot be linked back to them. We use anonymised data to improve our services and for research.
<i>Consent</i>	Your clear and specific agreement for us to use your information for a particular purpose. You can withdraw your consent at any time.
<i>Data controller</i>	An organisation, like BPAS, that decides how and why your personal information is used.
<i>Data processor</i>	An organisation or company that uses or stores your personal data on behalf of a data controller, following their instructions.
<i>Data protection laws</i>	The rules that protect your personal information. This includes the UK General Data Protection Regulation (UK GDPR), the Data Protection Act 2018, and the Data Use and Access Act 2025 (DUAA).
<i>IP address</i>	A unique number used to identify your computer or device when you use the internet. We collect this to help protect our website and improve its performance.
<i>Legitimate interests</i>	A legal reason to use your data when it is necessary for our work and does not unfairly affect your rights or privacy.
<i>Personal data</i>	Any information that can identify you, such as your name, date of birth, postcode, phone number, or health records.
<i>Processing</i>	Anything we do with your personal data including collecting, storing, using, or sharing it.

<i>Special category data</i>	Sensitive personal information, such as details about your health, sex life, race, religion, or beliefs. This type of data has extra legal protection.
<i>UK GDPR</i>	The UK's data protection law that sets out how organisations like BPAS must use and protect your personal information.

Appendix C: Your Data Rights

You have rights under UK data protection laws about the personal information we hold about you.

Some of these rights apply in all cases, while others only apply in certain situations or may be limited by law. For example, if we need to keep records for public health, safeguarding, or regulatory reasons.

Your rights include:

- **Right to be informed** – to know how and why we use your data
- **Right of access** - to ask for a copy of your data
- **Right to rectification** - to have inaccurate data corrected
- **Right to erasure** - to ask us to delete your data in some cases
- **Right to restrict use** - to limit how we use your data
- **Right to object** - to stop us using your data in certain ways
- **Right to data portability** - to transfer your data to another provider (in some cases)
- **Rights related to automated decisions** - to ask for a person to review decisions made solely by a computer (we do not use these)

To ask about your rights or make a request, please email: dataprotection@bpas.org.

You also have the right to raise concerns with the UK Information Commissioner's Office (ICO): www.ico.org.uk