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
- 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.

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

Your rights, how long we keep your information, and how to raise a concern with the Information Commission (ICO), the UK's data protection regulator, are explained in our main privacy notice at www.bpas.org/privacy.

If you use more than one BPAS service, for example, if you are both a patient 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.

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Booking and Online Services Data collected through call centres, website forms, online booking tools, and IP addresses.	3.2	Page 4
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Donors, Campaigners and Supporters Information collected for fundraising, campaigning, events, and mailing lists.	3.6	Page 9
Call and Video Recording Audio recordings of calls with our booking and information centre, counselling, aftercare, STARS and telemedicine services and video recordings of telemedicine consultations.	3.7	Page 11

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, and who we may share it with.

Organisations who work on our behalf

We may share personal information, including health information, with trusted suppliers, technology partners, consultants and professional advisers who provide services on our behalf. When these organisations handle health information, they must follow strict confidentiality terms in their contracts, have appropriate security in place, and only use the information for agreed purposes connected with delivering, managing and improving our healthcare services. Wherever possible, we pseudonymise the information first. This means we remove or replace details such as your name, so you cannot be directly identified.

3.1 Abortion, Vasectomy and Sexual Health Services

What we collect	Personal and medical information including but not limited to: Your name, contact details, date of birth, NHS number, GP information, pregnancy and sexual health information, medical history, emergency contact details, consent forms, clinical notes, diagnostic results, safeguarding information, notes from counselling sessions, support contacts, safeguarding concerns, consent for contact, communications preferences.
Why we use it	To assess your needs, provide treatment, meet legal obligations, safeguard individuals, and report to commissioners and regulators. To provide emotional support, follow-up care, and advice before or after treatment, and meet safeguarding obligations. If you speak to our telemedicine, counselling or aftercare teams, your call or video consultation may be recorded. Section 3.7 explains what we record, why and how long we keep it.
Our legal basis	The following lawful bases apply to the information we process about you: • Legitimate interests • Legal obligations (as set out below) • Public tasks (arising from the below laws) • Provision of health care • Explicit Consent (where expressly requested) • Legal claims • Medical research
Applicable Laws	BPAS is subject to numerous obligations, these include but are not limited to the: • Abortion Act 1967 • Abortion Regulations 1991 • Medicines Act 1968 • Health and safety legislation • Health services legislation & standards • NHS England Patient Safety Incident Response Framework (PSIRF) • Charitable standards and laws • NHS - A Framework for Sexual Health Improvement in England • Care Quality Commission (Registration Requirements) Regulations 2009 • Care Quality Commission (Registration) and (Additional Functions) and Health and Social Care Act 2008 (Regulated Activities) (Amendment) Regulations 2012

	• Care Quality Commission (Registration and Membership) (Amendment) Regulations 2012 • Safeguarding Vulnerable Groups Act 2006 • Care Act 2014 • Children Act 2004 & 1989 • Modern Slavery Act 2015 • Statutory guidance on medical research • The Human Rights Act 1998 • The Data Protection Act 2018 & the UK General Data Protection Regulations
Who we share it with	Where necessary we may share your data with third parties including but not limited to: • NHS • UK Health Security Agency and Office for Health Improvement and Disparities (formerly Public Health England) • Care Quality Commission (CQC) • An Official Ombudsman • Third party health providers such as sexual health providers, pharmacies, laboratories and ultrasound providers • Statutory agencies – such as the Police, the Information Commission, local authorities, governmental bodies and safeguarding bodies. • Our IT and telephony suppliers to enable digital services and maintenance • Third party data protection consultants and specialists • Trainee medical professionals – please note such individuals will be subject to strict confidentiality agreements and be required to undertake data protection training • Third party digital suppliers of live chat and chat bot functionality • Insurance providers We may need to complete safeguarding consultations before giving treatment or advice. This may be done by a secure video call, which is recorded. Section 3.7 explains what we record, why and how long we keep it.
Restricted transfers?	We do not routinely share data outside the UK. If we do, we will only share with countries the UK recognises as having adequate data protection (known as “adequate areas”), or we will make sure appropriate legal safeguards are in place.

3.2 Booking and Online Services

What we collect	Personal and medical information including, but not limited to your name, date of birth, contact details, postcode, NHS number, GP details, Pregnancy information, IP address, consent and communication preferences.
Why we use it	We schedule and manage appointments for BPAS patients, as well as for third-party health and care partners. This includes: • Coordinating appointments and treatment on behalf of third-party health and care partners* • Referring patients for appointments and treatment to third-party health and care partners*

	• Maintaining booking records • We document and support treatments, care, visits, contact and advice in line with our legal obligations, public duties and legitimate interests. • We obtain NHS funding where required in accordance with our legitimate interests. • We process patient feedback, surveys and complaints as part of our legitimate interests and statutory obligations. • We process payments for services. • We record telephone calls for training and quality assurance in line with our legitimate interests. See section 3.7. • We undertake research, including medical research. • We manage or defend legal proceedings. • We comply with health and charity law. • We meet information security requirements. • We take steps to safeguard individuals. We may also send surveys, for example customer satisfaction surveys, to people who have agreed to receive them (see section 3.3).
Our legal basis	The following lawful bases apply to the information we process about you: • Legitimate interests • Legal obligations (as set out below) • Public tasks (arising from the below laws) • Provision of health care • Explicit Consent (where expressly requested) • Legal claims • Medical Research in Public Interest
Applicable laws	BPAS is subject to numerous obligations, these include, but are not limited to: • Abortion Act 1967 • The Abortion Regulations 1991 • Medicines Act 1968 • Health and safety legislation • Health services legislation & standards • NHS England Patient Safety Incident Response Framework (PSIRF) • Charitable standards and laws • NHS - A Framework for Sexual Health Improvement in England • Care Quality Commission (Registration Requirements) Regulations 2009 • The Care Quality Commission (Registration) and (Additional Functions) and Health and Social Care Act 2008 (Regulated Activities) (Amendment) Regulations 2012 • The Care Quality Commission (Registration and Membership) (Amendment) Regulations 2012 • Safeguarding Vulnerable Groups Act 2006 • Care Act 2014 • The Children Act 2004 & 1989 • The Modern Slavery Act 2015 • Statutory guidance on Medical Research • The Human Rights Act 1998 • The Data Protection Act 2018 & the UK General Data Protection Regulations

Who we share it with	Where necessary we may share your data with third parties including but not limited to: • NHS • UK Health Security Agency and Office for Health Improvement and Disparities (formerly Public Health England) • Care Quality Commission (CQC) • An Official Ombudsman • Third party health providers such as sexual health providers, pharmacies, laboratories and ultrasound providers • Statutory agencies – such as the Police, the Information Commission, local authorities, governmental bodies and safeguarding bodies. • Our IT and telephony suppliers to enable digital services and maintenance • Third party data protection consultants and specialists • Trainee medical professionals – please note such individuals will be subject to strict confidentiality agreements and be required to undertake data protection training • Third party digital suppliers of live chat and chat bot functionality • Insurance providers We may need to complete safeguarding consultations before giving treatment or advice. This may be done by a secure video call, which is recorded. Section 3.7 explains what we record, why and how long we keep it.

3.3 Research, Audit and Quality

What we collect	Personal and medical information we may process includes, but is not limited to: your name, contact details, date of birth, customer satisfaction feedback, service data, audit samples, and health outcomes. Where possible, we minimise the amount of data collected and will pseudonymise or anonymise information when appropriate.
Why we use it	To evaluate service quality, undertake research, support audit and quality, and improve patient outcomes.
Our legal basis	The following lawful bases apply to the information we process about you: • Legitimate interests • Legal obligations (as set out below) • Public tasks (arising from the below laws) • Explicit Consent (where expressly requested) • Legal claims • Medical Research in Public Interest
Applicable laws	We process such information in accordance with a number of research and data protection laws, including but not limited to: • The Data Protection Act 2018 • The UK General Data Protection Regulations • UK Policy Framework for Health and Social Care Research • Abortion Act 1967 • Abortion Regulations 1991 • Medicines Act 1968

Who we share it with	Academic institutions, NHS bodies, ethics-approved researchers (subject to data sharing agreements).

3.4 CCTV and Site Security

What we collect	Video recordings from CCTV at BPAS sites.
Why we use it	To protect staff, patients, and property, and investigate incidents.
Our legal basis	UK GDPR Article 6(1)(f) – legitimate interests.
Applicable laws	We process CCTV footage in accordance with: • Health & Safety legislation • The Surveillance Camera Code of Practice • The Data Protection Act 2018 • The UK General Data Protection Regulations
Who we share it with	Where necessary we may share your data with third parties including but not limited to: • An Official Ombudsman • Statutory agencies – such as the Police, the Information Commission, local authorities, governmental bodies and safeguarding bodies. • Our IT supplier to enable digital services and maintenance • Third party data protection consultants and specialists • Insurance providers

3.5 Employees and Volunteers

What we collect	Personal and special category information we may process includes, but is not limited to: Employment records, health checks, training records, DBS checks, payroll, regulatory information, pension details, and staff survey responses (including optional equality information such as ethnicity and disability).
Why we use it	• To process your salary and associated employment information • To manage your employment in line with statutory requirements and internal employment policies • To meet our equality, diversity and inclusion responsibilities • To understand staff experience and engagement through our staff survey • To manage performance, conduct, skills, and to administer employee benefits • To manage work-related health information • To process statutory deductions • To administer your workplace pension • To manage the transfer of budget-related information • To enable independent audits • To provide access to external training relevant to your professional development • To assess your suitability for roles (for job applicants) • To conduct pre-employment checks where an application is successful (for job applicants) • To complete anonymised equality reporting and inform future recruitment activity • To support or defend legal claims • To safeguard employees and patients • To provide secure digital access to systems and resources

	• To manage the allocation and use of user accounts and BPAS assets • To maintain information security, including monitoring and preventing security incidents • To investigate and resolve complaints or service requests • To support business continuity through data backup and recovery • To authenticate employee accounts through multi-factor authentication • To enable the use and integration of systems and digital platforms • To ensure clinical and care standards are met • To record calls and video consultations for training and monitoring purposes (see section 3.7) • To record training sessions and Executive meetings in line with the Procedure on audio and visual recording of digital meetings • To ensure safe access to BPAS buildings, offices and clinics, including spaces leased or rented from third parties
Employee monitoring	We may monitor the use of BPAS equipment, staff behaviour, and time-keeping to help prevent and detect crime, investigate unauthorised use, ensure policies and procedures are followed, and support training and quality control. This is carried out in line with the Data Protection Act 2018 and UK GDPR. Examples of monitoring may include, but are not limited to: surveillance, system audits, remote-working checks, IT access and usage, building access, performance, and the use of financial assets. Please note: staff are not routinely monitored in a blanket way. Any monitoring will always be proportionate and justified. BPAS uses certain electronic monitoring and interception measures to meet its legal responsibilities under data protection laws. Monitoring may also be used when it: • helps BPAS comply with other legal or regulatory requirements • confirms specific facts • verifies that work is being carried out to the required standards • supports UK security • helps prevent or detect crime • ensures communication systems are working properly • identifies unauthorised use of BPAS systems
Our legal basis	We process your data in accordance with: • Our contractual obligations • Our legitimate interests • Substantial public interest – for example, equality monitoring • Our legal obligations – under employment, equalities, health & safety legislation and to comply with clinical and care standards • Explicit consent (where expressly requested)
Applicable laws	We process such information in accordance with a number of employment and data protection laws, including but not limited to: • Employment Rights Act 1996 • The National Minimum Wage Act 1998 • The Agency Workers Regulations 2010 • The Equality Act 2010 • The Working Time Regulations 1998

	• The Data Protection Act 2018 • The Employment Relations Act 1999 • The Maternity and Parental Leave etc. Regulations 1999 • The Health Protection (Notification) Regulations 2010 • The Public Health (Control of Disease) Act 1984 and associated Regulations • The Safeguarding Vulnerable Groups Act 2006 • The Health and Safety at Work Act 1974 • The Health and Social Care Act 2008 (Regulated Activities) Regulations 2014
Who we share it with	We share your information with internal and external partners where required for you to carry out your professional role, and where disclosure is compatible with our duty of confidence and your reasonable expectation of privacy. Where necessary, your data may be shared with: • Care Quality Commission (CQC) • HM Revenue & Customs • Disclosure and Barring Service • The General Medical Council and the Nursing & Midwifery Council • HM Courts & Tribunals Service • Police and other law-enforcement authorities • Department for Work and Pensions • Pension administrators • External organisations involved in TUPE processes • IT suppliers providing digital services, security and maintenance • Workday Peakon, our staff survey provider • Telephony and call-recording provider (RingCentral) • NHS bodies, UK Health Security Agency and Office for Health Improvement and Disparities • Official Ombudsmen • Third-party health providers (e.g., sexual health services, pharmacies, laboratories) • Statutory agencies such as local authorities, the Information Commission, government bodies and safeguarding organisations • External employment lawyers involved in staff litigation • Partner organisations • Data-protection consultants and specialists • Trainee medical professionals (all subject to strict confidentiality requirements and mandatory data-protection training) • Office and facilities-management providers for BPAS-leased or rented premises • Insurance providers Some staff survey comments may be processed in the EU to create summaries. The UK recognises the EU as having adequate data protection.

3.6 Donors, Campaigners and Supporters

What we collect	Personal and special category information including but not limited to: Contact details, donation history, payment information Gift Aid records, campaign sign-ups, event attendance, your views.
How we collect data	Information you give us. You may give us information about your identity,

	contact details, financial and/or transaction data and marketing and 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. Information we collect about you. We may automatically collect personal information that is in the public domain through social media platforms or donation partner, this will be done overtly. Information we receive from other sources. We may receive personal data about you from various third parties and public sources. For example, we may receive: • Technical data from analytics providers; • Contact, financial and transaction data from providers of technical, payment and delivery services; • Public sources of information on the internet based on what you do • (journalists) or your opinions as they relate to our services, and • Identity and contact data from selected business partners, data brokers or aggregators. • 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. We may also use your information if you have made this public, are over 18 and may have interacted with us.
Why we use it	• Process payments, claim Gift Aid, and complete identity checks • Contact you with general BPAS information • Inform you about our services and campaigns • Fulfil purchases you have made • Promote engagement and support BPAS' charitable aims • Meet information security and payment security obligations • Ensure compliance with data protection legislation
Our legal basis	We process your data in accordance with: • Our legitimate interests • Contractual obligations • Your Explicit Consent (where expressly requested)
Applicable Laws	We process such information in accordance with the: • Data Protection Act 2018 • UK General Data Protection Regulations • Privacy and Electronic Communications Regulations 2003 • Donations to Charity (Gift Aid Declarations) Regulations 2016
Who we share it with	Where necessary we may share your data with third parties including but not limited to: • An Official Ombudsman • Statutory agencies – such as the Police, the Information Commission, local authorities, governmental bodies and safeguarding bodies. • Our IT supplier to enable digital services and maintenance • Our telephony and call recording provider • Third party data protection consultants and specialists If you interact with or donate to us through these services, your information will also be handled under their own privacy policies: • Facebook – Applies when you interact with us through Facebook. • Google / Google Analytics – Used to understand how people use our website.

	• HMRC – We share information to process Gift Aid claims. • Instagram – Applies when you interact with us through Instagram. • JustGiving – Applies when you donate via JustGiving. • Mailchimp – Used to send marketing and campaign emails. • Payment service providers / Banks – Used to process donations or payments. • Savoo – Applies when you donate via Savoo. • SurveyMonkey – Used to send surveys. • Virgin Money Giving – Applies when you donate via Virgin Money Giving. • X (formerly Twitter) – Applies when you interact with us on X. • YouTube – Applies when you interact with our YouTube channels.

For further information on cookies please refer to cookies policy: https://www.bpas.org/cookie-policy/

3.7 Call and Video Recording

What we collect	Audio recordings of calls with our booking and information centre (BIC), our counselling and aftercare services, our STARS sexual health team and our telemedicine service, and video recordings of telemedicine video consultations. Recordings can include what you tell us about your health and care, and anyone else who speaks or can be seen during the call. Video recordings may also show your surroundings. Before your call or video consultation starts, our telemedicine and counselling teams will let you know that it will be recorded. You can ask them not to record it, or to stop the recording at any time during the call. This will not affect your care. BPAS staff who take part in these calls are also recorded. We also record calls that BPAS staff make to our IT service delivery team.
Why we use it	We record calls for training and monitoring purposes, to check and improve the quality of our care and service and to support our staff. For some services, such as counselling and telemedicine, recordings may also be used for clinical supervision. Where needed, recordings may also be used to look into complaints and incidents, or where we are legally required to. A recording does not replace your clinical notes, which remain the official record of your care.
Our legal basis	The following lawful bases apply to the information we process about you: • Legitimate interests • Legal obligation • Public task • Provision of health care • Legal claims (where needed)
Who we share it with	Access to recordings within BPAS is restricted to authorised staff. RingCentral, our call and video recording provider, stores them on our behalf under contract. Where needed, we may share a recording with regulators (e.g. CQC), safeguarding teams, our legal advisers or insurers, or with others where legally required.

How long we keep it	How long we keep recordings depends on the service: • Booking and information centre (BIC) and counselling: 12 months • Aftercare 12 months or 8 years • STARS sexual health team and telemedicine: 90 days • Calls to our IT service delivery team: 90 days We then securely delete them. If we need to keep a recording for longer to look into a complaint or incident, or because we are legally required to, it is kept securely until it is no longer needed.
Restricted transfers?	We do not routinely share data outside the UK. If we do, we will only share with countries the UK recognises as having adequate data protection (known as “adequate areas”), or we will make sure appropriate legal safeguards are in place.
Copies of recordings	You can ask for a copy of your recording. We may use secure transcription software to create a written copy. We may need to remove or edit parts of it to protect other people’s privacy, for example anyone else who can be heard or seen, or who is talked about.

Appendix A: 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
Anonymised data	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.
Consent	Your clear and specific agreement for us to use your information for a particular purpose. You can withdraw your consent at any time.
Data controller	An organisation, like BPAS, that decides how and why your personal information is used.
Data processor	An organisation or company that uses or stores your personal data on behalf of a data controller, following their instructions.
Data protection laws	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).
Information Commission	The UK’s independent regulator for data protection, also known as the ICO. It took over from the Information Commissioner on 30 September 2026.
IP address	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.

Legitimate interests	A legal reason to use your data when it is necessary for our work and does not unfairly affect your rights or privacy.
Personal data	Any information that can identify you, such as your name, date of birth, postcode, phone number, or health records.
Processing	Anything we do with your personal data including collecting, storing, using, or sharing it.
Pseudonymised data	Information where details that directly identify you, such as your name, have been removed or replaced with a code. It is still personal data, because it could be linked back to you using separate information we keep securely.
Special category data	Sensitive personal information, such as details about your health, sex life, race, religion, or beliefs. This type of data has extra legal protection.
UK GDPR	The UK's data protection law that sets out how organisations like BPAS must use and protect your personal information.

Your Rights and How to Raise a Concern

You have rights over the personal information we hold about you. These include the right to ask for a copy of your information, to have it corrected and, in some cases, to ask us to delete it, or to restrict or object to how we use it.

You can find out more about your rights, and how long we keep your information, in our main privacy notice at www.bpas.org/privacy.

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

You also have the right to raise a concern with the Information Commission (ICO), the UK's data protection regulator: www.ico.org.uk