The Listening Path - Data Protection & GDPR Policy

(a service within Best Foot Forward)

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1. Introduction

The Listening Path is committed to protecting the privacy and personal data of all clients. This service operates as part of Best Foot Forward and adheres to:

- The UK General Data Protection Regulation (UK GDPR)
- The Data Protection Act 2018
- Best Foot Forward's data protection policies and procedures

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2. Data Controller

Personal data is processed under the data protection framework of Best Foot Forward, which acts as the Data Controller.

The Listening Path processes data in line with these organisational policies.

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3. What Information is Collected

The Listening Path may collect and store:

Personal Information

- Name, date of birth, contact details
- Parent/carer details (for under 18s)

Sensitive (Special Category) Data

- Information about emotional wellbeing and mental health
- Relevant background information shared in counselling
- EHCP-related information (where applicable)

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4. Lawful Basis for Processing

Data is processed under the following lawful bases:

- Consent – for counselling and communication
- Legitimate interests – to provide safe and effective support
- Legal obligation – for safeguarding responsibilities

Special category data is processed for the provision of health and social care support.

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5. How Information is Used

Personal data is used to:

- Provide counselling and emotional wellbeing support
- Maintain safe and appropriate records
- Communicate with clients, parents/carers, and professionals (with consent)
- Meet safeguarding and legal responsibilities

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6. Confidentiality and Information Sharing

Information is kept confidential and will not be shared without consent unless:

- There is a safeguarding concern
- There is risk of harm
- There is a legal obligation

In such cases, information will be shared in line with Best Foot Forward safeguarding procedures.

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7. Storage and Security

- Records are stored securely (locked or password-protected systems)
- Access is restricted to authorised individuals
- Appropriate measures are in place to prevent unauthorised access, loss, or misuse

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8. Data Retention

- Records are retained in line with professional and organisational guidelines (typically 5–7 years)
- After this period, data is securely deleted or destroyed

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9. Your Rights

Under UK GDPR, individuals have the right to:

- Access their personal data
- Request correction of inaccurate data
- Request deletion (where appropriate)
- Restrict or object to processing
- Withdraw consent

Requests should be made in writing.

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10. Online and Digital Data
Where services are delivered online:
- Secure platforms are used
- Reasonable steps are taken to protect privacy
- Clients are advised to access sessions in a private space

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11. Data Breaches
Any data breaches will be:
- Reported and managed in line with Best Foot Forward procedures
- Investigated promptly
- Reported to the ICO where required

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12. Contact
For questions about data protection, please contact:
Best Foot Forward
Bethany Russell / admin@bestfootforward.org.uk

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13. Policy Review
This policy is reviewed regularly and remains aligned with Best Foot Forward policies and current data protection legislation.