The Listening Path – Privacy Notice

(a service within Best Foot Forward)

1. Our Commitment to Your Privacy

At The Listening Path, we understand that seeking counselling involves trust. We are committed to protecting your privacy and handling your personal information with care, respect and confidentiality.
The Listening Path operates as part of Best Foot Forward Education and follows its data protection and safeguarding procedures.
This notice explains what information we collect, why we collect it, how we protect it and your rights under UK data protection law.

2. Who Is Responsible for Your Information?

Best Foot Forward Education is responsible for determining how personal information is collected and used through The Listening Path and acts as the data controller.
Website: https://www.bestfootforward.org.uk/
Privacy enquiries: admin@bestfootforward.org.uk

3. Information We Collect

Depending on the support requested, we may collect:

- Names, dates of birth and contact details.
- Parent, carer and emergency contact information.
- Referral and consultation information.
- Relevant information about emotional wellbeing, mental health and personal circumstances.
- Information about special educational needs, disabilities or EHCPs, where relevant.
- Counselling agreements, consent records and brief session notes.
- Relevant safeguarding information.
- Appointment, payment and communication records.

We only collect information that is necessary and relevant to providing our services.

4. How We Use Your Information

We use personal information to:

- Respond to enquiries and assess referrals.
- Arrange and provide appropriate counselling support.
- Maintain accurate and confidential professional records.
- Communicate about appointments and service arrangements.
- Protect clients and others from harm.
- Meet legal, safeguarding and professional responsibilities.

- Manage payments and service administration.

We do not sell personal information or use confidential counselling records for marketing.

5. Our Legal Basis for Processing

We process personal information in accordance with the UK GDPR and Data Protection Act 2018.
Depending on the circumstances, our lawful bases may include contractual necessity, legitimate interests, legal obligations and consent.
Counselling information may include special category data, such as health information. We process this only where an appropriate additional legal condition applies, including relevant health or social care provisions where the legal requirements are met.
Consent to receive counselling is separate from the legal basis used to process personal information.

6. Confidentiality and Information Sharing

Counselling is confidential, and information shared during sessions is treated sensitively. Information may be shared when:

- You have agreed to specific information being shared.
- There is a safeguarding concern or significant risk of harm.
- Disclosure is required or otherwise permitted by law.
- Limited information is needed for appropriate professional supervision.

Where safeguarding information must be shared, we follow Best Foot Forward's safeguarding procedures and disclose only what is necessary.
We do not routinely share detailed counselling discussions with parents, schools or local authorities.

7. Children and Young People's Privacy

Children and young people have their own privacy and data protection rights.
We explain confidentiality and information sharing in an age-appropriate way.
Parents and carers may be involved in arranging counselling, but this does not automatically give them access to everything discussed during sessions.
Requests for information are considered individually, taking account of the young person's understanding, rights, wishes and safeguarding needs.

8. Professional Supervision

Our counsellors may discuss aspects of their work during professional supervision to maintain safe and ethical practice.
Information is anonymised wherever possible, and supervisors are expected to maintain appropriate confidentiality.

9. Keeping Your Information Safe

We use appropriate organisational and technical safeguards to protect personal information.
These include secure record storage, restricted access, appropriate confidentiality arrangements and secure communication methods.
Only authorised individuals can access information where necessary for their responsibilities.

10. How Long We Keep Information

Personal information is retained in accordance with Best Foot Forward's data retention procedures, applicable legal requirements and relevant professional obligations.
Counselling records may need to be retained after sessions have ended, particularly where services involve children.
Information is securely deleted or destroyed when it is no longer required.
Specific retention periods are available upon request.

11. Your Data Protection Rights

Depending on the circumstances, you may have the right to:

- Request access to your personal information.
- Ask us to correct inaccurate information.
- Request deletion where legally appropriate.
- Restrict or object to certain processing.
- Request transfer of eligible information.
- Withdraw consent where processing relies on consent.

Some rights are subject to legal exceptions, particularly where safeguarding or statutory obligations apply.

12. Third-Party Services

We may use secure external systems to manage referrals, appointments, communications and records.
Where third-party providers process information on our behalf, we take appropriate steps to ensure suitable data protection arrangements are in place.
If personal information is transferred outside the UK, appropriate safeguards will be applied where required.
13. Questions or Concerns
If you have questions about how your information is handled, please contact Best Foot Forward Education.

Website: https://www.bestfootforward.org.uk/
Email: admin@bestfootforward.org.uk

If you remain concerned about how your personal information has been handled, you can contact the Information Commissioner's Office (ICO).
Website: https://ico.org.uk/

13. Changes to This Notice

We review this Privacy Notice regularly and update it when our services, procedures or legal obligations change.
The latest version will be available through The Listening Path website.

The Listening Path
Understanding begins with listening.
A service within Best Foot Forward Education.

Sarah Gaiger: +44 7824 903282
Email: sarah.gaiger@bestfootforward.org.uk
Website: www.bestfootforward.org.uk