

# Best Foot Forward - Data Protection Policy

Author: Andrew Russell  
Approved By: Bethany Russell  
Date Approved: October 2025  
Assigned Review Period: 1 Year  
Next Review Due: October 2026

## Purpose

To ensure that all personal data collected, processed, and stored by Best Foot Forward is handled lawfully, fairly, and transparently in accordance with the Data Protection Act 2018 and related legislation, protecting the rights, privacy, and security of all individuals whose information we hold.

## Key Contacts

| Name / Role  | Best Foot Forward Contact Information  |
|--|--|
| Designated Safeguarding Lead (DSL)<br>Bethany Russell    | <a href="mailto:beth@bestfootforward.org.uk">beth@bestfootforward.org.uk</a><br>07394 950803     |
| Deputy Designated Safeguarding Lead(s)<br>Andrew Russell | <a href="mailto:andrew@bestfootforward.org.uk">andrew@bestfootforward.org.uk</a><br>07538 719783 |

BEST FOOT FORWARD collects and uses personal information about staff, students, parents or carers and other individuals who come into contact with the service. This information is gathered in order to enable it to provide education, mentorship and other associated functions. In addition, there may be a legal requirement to collect and use information to ensure that BEST FOOT FORWARD complies with its statutory obligations.

## What is personal information?

Personal information or data is defined as data which relates to a living individual who can be identified from that data, or other information held. This includes:

- Names (including initials)
- Location data (e.g. home address)
- Contact information

It may also include factors specific to the individual's physical, physiological, genetic, mental, economic, cultural or social identity.

## Data Protection Principles

The Data Protection Act 2018 is based on data protection principles that BEST FOOT FORWARD must comply with. The principles say that personal data must be:

- Processed lawfully, fairly and in a transparent manner
- Collected for specified, explicit and legitimate purposes
- Adequate, relevant, and limited to what is necessary to fulfil the purposes for which it is processed
- Accurate and, where necessary, kept up to date
- Kept for no longer than is necessary for the purposes for which it is processed
- Processed in a way that ensures it is appropriately secure

This policy sets out how we aim to comply with these principles.

## Collecting Personal Information

We will only collect and process personal information where we have one of the six 'lawful bases' (legal reasons) to do so under GDPR law:

- The data needs to be processed so that BEST FOOT FORWARD can fulfil a contract with the individual, or the individual has asked the school to take specific steps before entering into a contract.
- The data needs to be processed so that BEST FOOT FORWARD can comply with a legal obligation.
- The data needs to be processed to ensure the vital interests of the individual, e.g. to protect someone's life.
- The data needs to be processed so that BEST FOOT FORWARD can perform a task in the public interest and carry out its official functions.
- The data needs to be processed for the legitimate interests of BEST FOOT FORWARD or a third party (provided the individual's rights and freedoms are not overridden).
- The individual (or their parent/carer when appropriate in the case of a pupil) has freely given clear consent.

Whenever we first collect personal data directly from individuals, we will provide them with the relevant information required by data protection law.

We will only collect personal information for specified, explicit and legitimate reasons and explain these reasons to the individuals when we first collect their information. If we want to use personal data for reasons other than those given when first obtained, we will inform the individuals concerned before we do so and seek consent where necessary.

Staff must only process personal information where it is necessary to do their jobs. When staff no longer need the personal information held and processed, the personal information must be deleted or anonymised.

## Sharing Personal Information

We will not usually share personal information, but may do so where:

- There is an issue with a pupil or parent/carer that puts the safety of our staff at risk.
- We need to liaise with other agencies - we will seek consent as necessary before doing this unless there has been harm to a young person, and consent in this instance is not required.
- Our suppliers or contractors need data to enable us to provide services to our staff and pupils – for example, IT companies.

When doing this, we will only appoint suppliers or contractors who can provide sufficient guarantees that they comply with data protection law, establish a data sharing agreement, and only share data that the supplier or contractor needs to carry out their service.

We will also share personal data with law enforcement and government bodies where we are legally required to do so, including for:

- The prevention or detection of crime and/or fraud.
- The apprehension or prosecution of offenders.
- The assessment or collection of tax owed to HMRC.
- In connection with legal proceedings.
- Where the disclosure is required to satisfy our safeguarding obligations.
- Research and statistical purposes, as long as personal data is sufficiently anonymised, or consent has been provided.

We may also share personal information with emergency services and local authorities to help them respond to an emergency that affects any of our pupils or staff.

Where we transfer personal information to a country or territory outside the European Economic Area, we will do so in accordance with data protection law.