Data Protection, Confidentiality and Information-Sharing Policy

Academic year 2026–2027

LIMISHA

TRAINING ACADEMY

Hair • Beauty • SEND Provision

Contents

1. Purpose and scope 3

2. Core principles 3

3. Lawful processing 3

4. Safeguarding and information sharing 3

5. Confidentiality 3

6. Individual rights 4

7. Security and processors 4

8. Photographs, recordings and communications 4

9. Breaches, concerns and incidents 4

11. Monitoring and review 4

Data Protection, Confidentiality and Information-Sharing Policy

1. Purpose and scope

This policy explains how Limisha Training Academy processes personal data lawfully, fairly, securely and transparently. It applies to learner, parent/carer, staff, applicant, visitor, contractor, commissioner and partner information in paper, electronic, audio, image and video form. It supports the Academy's duties under UK data protection law, safeguarding legislation and Hampshire safeguarding and information-sharing expectations for education and alternative provision.

2. Core principles

The Academy will apply the following principles whenever personal data is collected, used, stored, shared, retained or deleted.

3. Lawful processing

The Academy will identify and record an appropriate lawful basis before processing personal data. Special category data and criminal offence data require an additional legal condition and enhanced safeguards. Consent will not be used where another lawful basis is more appropriate or where consent cannot be freely withheld.

- Use personal data lawfully, fairly and transparently.
- Collect data for specified, explicit and legitimate purposes.
- Collect only what is adequate, relevant and necessary.
- Keep data accurate and up to date.
- Retain data only for as long as required.
- Protect data through appropriate technical and organisational controls.
- Be able to demonstrate accountability through records, training, review and audit.

4. Safeguarding and information sharing

Data protection law does not prevent proportionate information sharing where this is necessary to safeguard or promote the welfare of a child or adult at risk. Staff must share relevant concerns promptly with the Designated Safeguarding Lead and must not delay a safeguarding referral while seeking consent where doing so may increase risk. Information shared will be relevant, necessary, accurate, timely, secure and recorded.

- Staff will follow Hampshire safeguarding procedures, the Academy safeguarding policy and agreed commissioner reporting routes.
- Information-sharing decisions will be based on a clear purpose, the learner's welfare, legal duties and the need to prevent harm.
- Where appropriate and safe, learners and parents/carers will be informed about what is being shared and why.
- Consent will be sought where required, but the absence of consent will not prevent sharing where there is a safeguarding, legal or public interest reason to share.
- Records must state what was shared, with whom, when, how, why and by whom.

5. Confidentiality

- Access is limited to staff who need the information for their role.
- Sensitive conversations take place privately and discreetly.

- Personal data is not sent to personal email accounts or stored on unapproved devices.
- Paper files are secured when unattended and transported only where necessary and authorised.
- Learner information is not discussed in public areas or with unauthorised people.
- Confidentiality cannot be promised where safety, safeguarding, legal duties or commissioner requirements require disclosure.

6. Individual rights

Requests for access, correction, erasure, restriction, objection or data portability must be passed immediately to the Data Protection Lead. Identity will be verified and statutory time limits monitored. Exemptions will be applied only where lawful, proportionate and documented.

7. Security and processors

Systems will use role-based access, strong passwords, multi-factor authentication where available, secure backups, device encryption and timely removal of access. Third-party processors must be assessed, contracted and monitored. Data protection impact assessments will be completed where processing is likely to create high risk.

8. Photographs, recordings and communications

Images and recordings will be taken and used only for an identified purpose, with appropriate authority and safeguards. Staff must use approved communication channels and must not contact learners through personal social-media accounts. Online communication, photographs and recordings must be consistent with safeguarding expectations, consent records, commissioner requirements and the Academy's acceptable-use arrangements.

9. Breaches, concerns and incidents

Any suspected or actual personal data breach, loss of records, unauthorised access, misdirected communication or confidentiality concern must be reported immediately to the Data Protection Lead and Director. The Academy will assess risk, contain the incident, record actions, notify relevant parties where required and use learning to improve systems, training and practice.

10. Records, retention and transfer

Records will be accurate, factual, dated, attributable and stored securely. Retention periods will reflect legal, safeguarding, contractual and commissioner requirements. When a learner moves setting or a placement ends, relevant safeguarding, attendance, progress, risk and support information will be transferred securely to the commissioner, home school or receiving setting in line with Hampshire procedures and statutory expectations.

11. Monitoring and review

The Academy will monitor implementation of this policy through privacy information, a data inventory, breach log, retention schedule, processor records, information-sharing records and staff training evidence. Accountability will be demonstrated through clear allocation of responsibilities, accurate records, documented decisions, staff awareness, leadership oversight and evidence of review, audit and follow-up action. The policy will be reviewed at least annually and after significant incidents, changes in law, Hampshire framework updates, commissioner feedback or safeguarding learning. Review findings will inform staff training, policy updates, risk assessment and quality assurance.