Privacy and Data Protection Policy

Effective Date: April 2026

Review Date: April 2027

Introduction

Life Journey Academy Ltd ("we," "us," or "our") is committed to protecting the privacy and security of personal data in accordance with the UK General Data Protection Regulation (UK GDPR), as retained in UK law following Brexit, and the Data Protection Act 2018. This policy outlines how we collect, process, store, and protect personal data, as well as the rights of individuals ("data subjects") under the UK GDPR.

This policy applies to all employees, contractors, and third parties who process personal data on behalf of Life Journey Academy Ltd.

Purpose and Scope

The purpose of this policy is to ensure that Life Journey Academy Ltd complies with its legal obligations under the UK GDPR when handling personal data. Personal data refers to any information relating to an identified or identifiable individual. This policy applies to all personal data we process, regardless of whether it is held electronically or in physical form.

Principles of Data Protection

We adhere to the following UK GDPR principles when processing personal data:

- **Lawfulness, Fairness, and Transparency:** We process personal data lawfully, fairly, and in a transparent manner.
- **Purpose Limitation:** We collect personal data only for specified, explicit, and legitimate purposes and do not process it in a manner incompatible with those purposes.

- **Data Minimisation:** We ensure that personal data is adequate, relevant, and limited to what is necessary for the purpose.
- **Accuracy:** We take reasonable steps to ensure personal data is accurate and kept up to date.
- **Storage Limitation:** We retain personal data only for as long as necessary for the purposes for which it was collected.
- **Integrity and Confidentiality:** We process personal data securely, protecting it against unauthorised or unlawful processing, accidental loss, destruction, or damage.
- **Accountability:** We are responsible for and can demonstrate compliance with these principles.

Lawful Basis for Processing

We will only process personal data when we have a lawful basis to do so. The lawful bases we may rely on include:

- **Consent:** The data subject has given clear consent for us to process their personal data for a specific purpose.
- **Contract:** Processing is necessary to fulfil a contract with the data subject or to take steps at their request before entering a contract.
- **Legal Obligation:** Processing is necessary to comply with a legal obligation.
- **Legitimate Interests:** Processing is necessary for our legitimate interests or those of a third party, except where overridden by the data subject's rights and freedoms.
- **Vital Interests:** Processing is necessary to protect someone's life.
- **Public Task** (where applicable): Processing necessary to perform a task carried out in the public interest.

We will document the lawful basis for processing in our records and inform data subjects as required.

Special Category Data

Life Journey Academy processes special category data as part of its core work supporting children, young people, and adults with SEND, SEMH needs, and

neurodivergent profiles. Special category data processed by LJA includes health and medical information, SEND and neurodevelopmental diagnoses, mental health history, and in some cases information about ethnicity or religion where relevant to delivering appropriate support.

Processing of special category data is carried out under Article 9(2) of the UK GDPR. The conditions we rely on include:

Explicit consent from the data subject or, where the data subject is a child, from their parent or carer.

Processing necessary for the provision of health or social care, or the management of health or social care systems, under Schedule 1 of the Data Protection Act 2018.

Processing necessary for reasons of substantial public interest, specifically in the context of equality of opportunity and treatment, and safeguarding of children and individuals at risk, under Schedule 1, Part 2 of the Data Protection Act 2018.

All special category data is handled with the highest level of care. Access is restricted to those with a direct need to see it. It is stored securely, retained only for the periods specified in the Data Retention Policy, and never shared without a lawful basis and, where required, explicit consent.

Children's Data

Life Journey Academy works with children from the age of 7. Where we process the personal data of children under 13, we obtain consent from a parent or carer rather than from the child directly. For young people aged 13 and above, we assess capacity to consent on an individual basis, taking into account their maturity, understanding, and any relevant SEND or SEMH considerations.

All content and communications directed at children and young people are written in age-appropriate language. Children and young people are informed about how their data is used in a way they can understand, alongside the information provided to their parents or carers.

We do not use children's personal data for any purpose beyond the delivery of support, reporting to commissioners, and statutory obligations. We do not use children's data for profiling or marketing purposes.

Safeguarding and Data Sharing

Life Journey Academy recognises that the duty to safeguard children, young people, and adults at risk may require the sharing of personal data without the consent of the data subject. In such cases, the safety and welfare of the individual takes precedence over confidentiality obligations.

Where a safeguarding concern arises, personal data may be shared with the local authority, police, MASH, or other relevant agencies without consent where this is necessary to protect the individual or others from harm. Such sharing is carried out under Article 6(1)(c) of the UK GDPR (legal obligation) and, where special category data is involved, under Article 9(2)(b) and Schedule 1, Part 1 of the Data Protection Act 2018.

All safeguarding data sharing decisions are made by the DSL (Lee Johnson) or DDSL (Natalia Krasnianska) and are recorded in the safeguarding log. Personal data shared for safeguarding purposes is limited to what is necessary and proportionate to the concern.

Data Subject Rights

Under the UK GDPR, data subjects have the following rights:

- **Right to be Informed:** To know how their personal data is being processed.
- **Right of Access:** To request access to their personal data (via a Subject Access Request).
- **Right to Rectification:** To request correction of inaccurate or incomplete data.
- **Right to Erasure:** To request deletion of their personal data (the “right to be forgotten”), where applicable.
- **Right to Restrict Processing:** To limit the processing of their personal data in certain circumstances.
- **Right to Data Portability:** To receive their personal data in a structured, commonly used, and machine-readable format.
- **Right to Object:** To object to processing based on legitimate interests, direct marketing, or public tasks.

- **Rights Related to Automated Decision-Making:** To not be subject to decisions based solely on automated processing, including profiling, that produce legal or significant effects, unless certain conditions are met.

Requests to exercise these rights should be directed to our Data Protection Officer at contact@ljacademy.co.uk. We will respond within one month of receiving a request, unless an extension is legally permitted under UK GDPR.

Data Collection and Processing

We collect personal data directly from data subjects (e.g., children, young people, adults receiving support, families, employees, contractors, commissioners, or suppliers) or from third parties where lawful. Examples of personal data we may process include:

- Names, addresses, email addresses, and phone numbers.
- Employment details (for employees or contractors).
- Payment or transaction information.

We will:

- Inform data subjects about the purpose of collection and how their data will be used at the point of data collection. Where personal data is collected via website forms, enquiry submissions, or any other direct contact, individuals are informed of how their data will be used before or at the point of submission, in line with UK GDPR transparency requirements.
- Limit collection to what is necessary for the intended purpose.
- Ensure data is processed securely and in compliance with this policy.

Data Storage and Retention

Personal data will be stored securely using appropriate technical and organisational measures, such as encrypted digital storage and secure physical storage where required. Our retention periods are outlined in our Data Retention Policy. When data is no longer needed, it will be securely deleted or anonymised.

Cookies and Website Data

Our website at ljacademy.co.uk may use cookies to support basic functionality and improve user experience. Cookies are small text files placed on your device when you visit a website.

The types of cookies our website may use include:

Strictly necessary cookies, which are required for the website to function and cannot be switched off. They do not store any personally identifiable information.

Analytics cookies are used to help us understand how visitors interact with our website. We use Google Analytics and Google Search Console for this purpose. These tools collect information such as pages visited, time spent on the site, and general location data. This information is collected anonymously and is used solely to improve our website. Google may process this data on servers outside the UK. Where this occurs, appropriate safeguards are in place through Google's compliance with UK adequacy standards and Standard Contractual Clauses approved by the ICO.

When you visit our website for the first time, you will be asked to accept or decline non-essential cookies. You can change your cookie preferences at any time through your browser settings. Disabling cookies may affect the functionality of some parts of the website.

Information collected through cookies, such as IP addresses and browsing behaviour on our site, is processed in line with the principles set out in this policy. It is not used to identify individuals and is not shared with third parties except where necessary for website operation.

Data Security

We implement appropriate technical and organisational measures to protect personal data, including:

- Encryption of sensitive data in transit and at rest.
- Access controls to limit who can view or process personal data.
- Periodic review of security arrangements and staff awareness and staff training on data protection.
- Procedures for detecting, reporting, and investigating data breaches.

In the event of a suspected data breach, staff must notify Lee Johnson or Natalia Krasnianska immediately. The DPO will assess the breach, determine whether ICO notification is required, and take steps to contain and remediate it. All breaches and near-misses are recorded in LJA's Incident and Accident Log

Data Sharing and International Transfers

We may share personal data with third parties only when necessary and under a lawful basis. Any third party processing data on our behalf will be bound by a Data Processing Agreement.

We use Google Analytics and Google Search Console to analyse website traffic. Data collected through these tools is processed by Google LLC in accordance with their privacy terms. For further information, see Google's Privacy Policy at policies.google.com/privacy.

If personal data is transferred outside the UK, we will ensure adequate safeguards are in place, such as:

- Transfers to countries with an adequacy decision from the UK government.
- Use of Standard Contractual Clauses (SCCs) approved by the ICO.

Roles and Responsibilities

- **Data Protection Lead (DPL):** Our DPL, Lee Johnson, is responsible for overseeing compliance with this policy and can be contacted at contact@ljacademy.co.uk.
- **Employees and Contractors:** All staff must comply with this policy and report any breaches or concerns to the DPL immediately.
- **Management:** Both directors are responsible for promoting a culture of data protection and ensuring resources are available for compliance.

Training and Awareness

All employees and contractors will receive regular training on UK GDPR requirements and this policy to ensure they understand their responsibilities.

Monitoring and Review

This policy will be reviewed annually or when significant changes occur in legislation or our operations. Compliance will be monitored through the annual policy review process and ongoing operational practice. Both directors are responsible for identifying and reporting any data protection concerns promptly.

Contact Us

For questions about this policy or to exercise your data subject rights, please contact:

Data Protection Lead: Lee Johnson

Email: contact@ljacademy.co.uk

Phone: 07765802889

Life Journey Academy Ltd is registered with the Information Commissioner's Office. Our ICO registration number is available on request.

Alternatively, you have the right to lodge a complaint with the Information Commissioner's Office (ICO): ZC122793

Website: www.ico.org.uk

Helpline: 0303 123 1113