
Information Security & Data Protection Policy

Policy Owner	Director of Operations
Approved By	Board of Directors
Version	2.0
Effective Date	August 2026
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Applies To	All employees, Directors, tutors, Teaching Assistants, agency workers, contractors and anyone processing information on behalf of LTS Group Limited

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1. Purpose

LTS Group Limited is committed to protecting the confidentiality, integrity and availability of information, and to processing personal data in accordance with the UK General Data Protection Regulation (UK GDPR), the Data Protection Act 2018 and applicable Information Commissioner's Office (ICO) guidance. This policy applies to all employees, Directors, agency workers, tutors, Teaching Assistants, contractors and anyone processing information on behalf of LTS.

LTS Group Limited is registered with the Information Commissioner's Office (ICO), registration number Z1923386.

2. Scope

This policy covers all personal and confidential information relating to employees, candidates, tutors, Teaching Assistants, clients, schools, academy trusts, local authorities, parents/carers and learners processed by LTS.

LTS provides appropriate Privacy Notices explaining how personal information is collected, used, retained and shared in accordance with UK GDPR.

3. Purposes for Processing Personal Data

LTS holds and processes personal data for the following general purposes:

- Staff administration;
- Advertising, marketing and public relations;
- Accounts and records;
- Recruitment, engagement and supply of candidates, tutors, Teaching Assistants and contractors;
- Compliance, safeguarding, regulatory and audit purposes.

4. Data Protection Principles

Personal data will be processed lawfully, fairly and transparently; collected for specified, legitimate purposes; limited to what is necessary; kept accurate and up to date, with inaccurate data corrected or deleted without undue delay; retained only as long as necessary for the purposes notified to the data subject; and protected by appropriate technical and organisational security measures.

5. Lawful Processing

LTS processes personal data using appropriate lawful bases under Article 6 of the UK GDPR, including contract, legal obligation, legitimate interests and consent where required. Data will be reviewed regularly, and in accordance with documented retention periods, to ensure it remains accurate, relevant and up to date.

6. Special Category and DBS Information

LTS processes special category and criminal offence data only where legally permitted and necessary for safer recruitment, safeguarding, employment and regulatory compliance.

7. Information Security

LTS maintains appropriate security measures including secure access controls, password protection, encrypted communications where appropriate (including Egress for secure email), secure IT systems, restricted access to records, secure disposal of confidential information and regular staff awareness. In practice, this includes:

- Computer screens must not be left unattended by anyone accessing personal information;
- Passwords and access credentials must never be disclosed or shared;
- Personnel files and other personal data must be stored securely and not removed from their usual place of storage without good reason and appropriate authorisation;
- Files must be locked away when not in use, and never left unattended when in use;
- Care must be taken when sending personal data by post or electronically, using secure methods such as encryption where appropriate;
- Personal data must be securely destroyed when no longer needed, in line with company procedures, as disposal itself counts as processing.

Employees are responsible for reporting and correcting any inaccurate or outdated data they become aware of in a timely manner, and for ensuring appropriate information security and confidentiality measures are maintained at all times.

8. Data Subject Rights

Individuals may exercise their rights under UK GDPR, including access, rectification, erasure (where applicable), restriction, objection and data portability. All requests must be referred immediately to the Compliance Manager.

Where a request is granted, the information will be provided within one month of the date of the request, subject to any lawful extension permitted under the UK GDPR.

Requests for access to a reference written by a third party must be referred to the Operational Director (Data Protection Lead) and treated with particular care, even where the reference concerns the person making the request — the person who wrote the reference also has a right to have their own personal data handled in accordance with data protection law, and it will not be disclosed without their consent or another lawful basis.

LTS will verify the identity of the requester before disclosing personal information.

9. Data Breaches

Any actual or suspected personal data breach must be reported immediately to the Operational Director (Data Protection Lead). LTS will investigate and mitigate the risk, and will notify the ICO and affected individuals where legally required to do so.

10. Artificial Intelligence

Any AI tools used by LTS must be approved, used responsibly and in accordance with UK GDPR, confidentiality obligations and applicable ICO guidance. Personal information must not be entered into unapproved AI systems.

11. Training

Relevant staff receive data protection and information security awareness training and are expected to comply with this policy and supporting procedures.

12. Related Documents

- Privacy Notice
- Records Management Policy
- Data Retention Schedule
- Information Security Procedures

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- Safeguarding & Child Protection Policy

13. Policy Approval

Approved by the Board of Directors.

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