

Beacon Alternative School CIC (and Alternative Provision)

Data Protection and Privacy Policy



Date: September 2026
Written by: O'Connell/Field
Review Due by: September 2027

Note: Beacon Alternative Provision operates under Beacon Alternative School CIC (company number 16406986), which is not currently a registered school but is working toward future registration. This policy applies to all personal data processed in connection with Beacon's work, wherever it takes place, including at our premises at 6 Kew Court, Pynes Hill, Exeter, EX2 5AZ.

1. Introduction

Beacon Alternative School CIC is committed to protecting the privacy and security of personal data. This policy outlines our compliance with UK GDPR and the Data Protection Act 2018, our data handling and storage procedures, and the privacy rights of pupils, families and staff.

2. Purpose

- Ensure compliance with UK GDPR, the Data Protection Act 2018 and other relevant data protection legislation.
- Outline the procedures for handling and storing personal data.
- Inform pupils, families and staff of their privacy rights.
- Set out who is responsible for data protection at Beacon and how to contact them.

3. Scope

This policy applies to all personal data processed by Beacon Alternative School CIC, including data relating to pupils, families, staff, volunteers, contractors and any other individuals.

4. GDPR Compliance

4.1 Lawful Basis for Processing

- **Consent:** Personal data is processed based on the consent of the data subject, which must be freely given, specific, informed, and unambiguous.
- **Contractual Necessity:** Data may be processed if it is necessary for the performance of a contract with the data subject.
- **Legal Obligation:** Processing may be required to comply with legal obligations.
- **Legitimate Interests:** Data may be processed if it is necessary for the legitimate interests of Beacon, provided these interests are not overridden by the rights and freedoms of the data subject.

4.2 Data Protection Principles

Beacon adheres to the following principles when processing personal data:

- **Lawfulness, Fairness, and Transparency:** Data is processed lawfully, fairly, and in a transparent manner.
- **Purpose Limitation:** Data is collected for specified, explicit, and legitimate purposes and not further processed in a manner that is incompatible with those purposes.
- **Data Minimisation:** Data collected is adequate, relevant, and limited to what is necessary in relation to the purposes for which it is processed.
- **Accuracy:** Data is accurate and, where necessary, kept up to date.

- **Storage Limitation:** Data is kept in a form which permits identification of data subjects for no longer than is necessary (see 6.3, Data Retention).
- **Integrity and Confidentiality:** Data is processed in a manner that ensures appropriate security, including protection against unauthorised or unlawful processing and against accidental loss, destruction, or damage.

4.3 Data Protection Lead

Beacon is a small organisation and is not required under UK GDPR to appoint a statutory Data Protection Officer (DPO). Beacon has instead appointed an internal Data Protection Lead to oversee its data protection strategy and compliance with UK GDPR.

Beacon Alternative School CIC has appointed Fiona Field (Director and Designated Safeguarding Lead) as its Data Protection Lead, with Steven O'Connell (Director) as deputy. Because the Data Protection Lead also holds a leadership role at Beacon, the Directors keep this arrangement under review and will consider seeking independent external data protection advice for any matter where this could present a conflict of interest.

Any questions, requests or concerns relating to data protection can be directed to:

- Email: beaconap@outlook.com
- Address: 6 Kew Court, Pynes Hill, Exeter, EX2 5AZ

5. ICO Registration

Beacon Alternative School CIC is registered with the Information Commissioner's Office (ICO) as a data controller.

- ICO Registration Number: ZC169247

Beacon's registration can be checked on the ICO's public register at ico.org.uk. Anyone with an unresolved concern about how Beacon handles personal data also has the right to complain directly to the ICO.

6. Data Handling and Storage Procedures

6.1 Data Collection

- **Transparency:** Data subjects are informed about the purposes of data collection, the legal basis for processing, and their rights through clear and accessible privacy notices.
- **Consent:** Where consent is required, it is obtained through a clear, affirmative action by the data subject.

6.2 Data Storage

- **Secure Storage:** Personal data is stored securely to protect against unauthorised access, alteration, disclosure, or destruction.
- **Access Controls:** Access to personal data is restricted to authorised personnel only, on a need-to-know basis.

6.3 Data Retention

Beacon retains personal data only for as long as necessary for the purpose it was collected, in line with the sector-recognised IRMS Records Management Toolkit for Schools. As a general approach:

- Pupil educational and safeguarding records are retained in line with statutory guidance and shared with any receiving school, college or setting on transfer.
- Staff recruitment and Single Central Record data is retained in line with the Safer Recruitment Policy.
- Financial and contractual records are retained in line with statutory financial requirements.

Specific retention periods for each record type are confirmed and reviewed by the Data Protection Lead.

6.4 Data Sharing

- **Third Parties:** Personal data is only shared with third parties who have a legitimate need to know, and where appropriate safeguards are in place.
- **Data Processing Agreements:** Third parties that process data on behalf of Beacon are required to sign data processing agreements to ensure UK GDPR compliance.

7. Pupil, Family and Staff Privacy Rights

7.1 Right to Be Informed

Data subjects have the right to be informed about the collection and use of their personal data. Beacon provides this information through privacy notices.

7.2 Right of Access

Data subjects have the right to access their personal data and obtain information about how it is being processed. Requests for access should be made to the Data Protection Lead using the contact details in section 4.3.

7.3 Right to Rectification

Data subjects have the right to have inaccurate personal data corrected or completed if it is incomplete.

7.4 Right to Erasure

Data subjects have the right to request the deletion of their personal data in certain circumstances, such as when the data is no longer necessary for the purposes for which it was collected.

7.5 Right to Restrict Processing

Data subjects have the right to request the restriction or suppression of their personal data under certain conditions.

7.6 Right to Data Portability

Data subjects have the right to obtain and reuse their personal data for their own purposes across different services.

7.7 Right to Object

Data subjects have the right to object to the processing of their personal data in certain circumstances, including direct marketing.

7.8 Rights Related to Automated Decision Making and Profiling

Data subjects have the right not to be subject to decisions based solely on automated processing, including profiling, which produces legal effects concerning them or similarly significantly affects them.

8. Breach Reporting

- **Reporting:** All data breaches must be reported immediately to the Data Protection Lead.
- **Investigation:** The Data Protection Lead will investigate the breach and take appropriate action to mitigate the effects and prevent recurrence.
- **Notification:** Where required, the Data Protection Lead will notify the Information Commissioner's Office (ICO, registration number ZC169247) within 72 hours of becoming aware of a breach, and will notify affected data subjects where there is a high risk to their rights and freedoms.

9. Related Policies

- Cyber Security Policy
- Online Safety and Technology Policy
- Safeguarding and Child Protection Policy
- Safer Recruitment Policy
- Complaints Policy

10. Review of the Policy

This policy will be reviewed annually to ensure it remains up to date and compliant with relevant legislation. Any necessary amendments will be made in consultation with staff and other stakeholders.

By adhering to this policy, Beacon Alternative School CIC ensures the protection of personal data, upholds the privacy rights of individuals, and maintains compliance with UK GDPR and other relevant data protection regulations.