



‘Improving the quality of family life’

Privacy Policy with ABA Video

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Protection and Privacy Notice (Including Parents, Pupils, Staff and Website Users)

This Data Protection and Privacy Notice is an overarching policy covering:

- Parents and Carers
- Pupils
- Staff and Volunteers
- Website Users

This policy is written in accordance with:

- UK GDPR
- Data Protection Act 2018
- Keeping Children Safe in Education (KCSIE)
- Independent School Standards (ISI)
- Ofsted Safeguarding Requirements

1. Data Controller Information

Data Controller: Snowflake School for Children with Autism Ltd

School Address: 10–14 Crown Street, London, W3 8SB

Age Range: 5–16

Type: Independent Special School (Autism Provision)

Contact Email: info@snowflakeschool.org.uk

Telephone: 020 7370 3232

2. Categories of Personal Data Collected

We collect and process personal data necessary to provide specialist education and safeguarding, including:

- Pupil records and admissions data
- Education, Health and Care Plans (EHCP)
- Special Educational Needs (SEND) data
- Behavioural and ABA assessment data
- Therapy and progress data
- Safeguarding and child protection records

- Medical and dietary information
- Attendance, incident and risk records
- Parent/carer contact information
- Staff employment and safeguarding data
- Website enquiry data

3. Special Category Data (Autism & ABA Provision)

As a specialist autism provision, we process special category data including:

- Health and medical information
- Behaviour analysis (ABA) data
- Therapy reports and developmental assessments
- Psychological and communication profiles
- Safeguarding records

This processing is lawful under UK GDPR Article 9(2)(g) and 9(2)(h) for safeguarding, education and provision of specialist support.

4. Lawful Basis for Processing

We process personal data under the following lawful bases:

- Legal Obligation (Education law, safeguarding duties, Independent School Standards)
- Public Task (Provision of education and SEND support)
- Vital Interests (Safeguarding children)
- Legitimate Interests (Operational management of the school)
- Article 9(2)(g) Safeguarding of children and individuals at risk

5. Safeguarding and Use of MyConcern

Safeguarding is a core legal duty of the school.

The school uses MyConcern, a secure safeguarding recording system, to:

- Record safeguarding concerns
- Monitor pupil welfare
- Log behavioural and safeguarding incidents
- Support early intervention and multi-agency safeguarding

Safeguarding information may be shared where legally required with:

- Local Authorities
- Social Care
- NHS and clinical professionals
- Safeguarding partners
- Ofsted and regulatory bodies

Access to MyConcern records is strictly restricted to authorised safeguarding staff only and is managed in line with KCSIE and data protection legislation.

6. Behaviour Analysis (ABA) and Specialist Data Use

As part of our specialist ABA provision, we may collect and process:

- Behaviour tracking data
- Functional Behaviour Assessments (FBA)
- Intervention plans and session data
- Progress monitoring and outcome data

This data is used solely to support pupils' education, wellbeing and therapeutic progress and is handled with strict confidentiality.

7. Video Recording and Observation (ABA & Safeguarding)

Video Recording and Observation (ABA, Safeguarding and Training)

As part of our specialist autism and ABA provision, the school may use video recording for legitimate educational, therapeutic and safeguarding purposes. This may include:

- Behaviour analysis and Functional Behaviour Assessments (FBA)
- Staff training and supervision
- Monitoring pupil progress and interventions
- Safeguarding and welfare monitoring
- Reviewing incidents where necessary for pupil safety

7.1 Lawful Basis

Video recordings are processed under:

- UK GDPR Article 6(1)(e) – Public Task (education and safeguarding)
- Article 9(2)(g) – Safeguarding of children and individuals at risk
- Article 9(2)(h) – Health and social care/therapeutic provision

7.2 Safeguards

- Recordings are stored securely on restricted systems

- Access is limited to authorised safeguarding and senior staff only
- Recordings are never used for marketing or external purposes
- Recordings are retained only for as long as necessary and then securely deleted
- Parents/carers are informed of the use of video as part of specialist provision

The school does not operate covert surveillance. Any recording is proportionate, necessary, and in the best interests of the child.

8. Data Sharing

We may share personal data, where legally necessary, with:

- Local Authorities placing pupils
- NHS professionals and therapists
- Educational psychologists
- Safeguarding agencies
- Ofsted and ISI inspectors
- Secure school management and safeguarding systems (including MyConcern)

We never sell personal data.

9. Data Security

We implement appropriate technical and organisational security measures including:

- Secure safeguarding system (MyConcern)
- Role-based access controls
- Encrypted digital systems
- Confidential staff training
- Secure storage of physical and electronic records
- Regular safeguarding and data protection oversight
- Secure storage and restricted access to video recordings used for ABA, safeguarding, and therapeutic review

10. Data Retention

We follow the Information and Records Management Society (IRMS) Schools Retention Schedule:

- Pupil records: Retained until age 25
- Safeguarding records: Retained in line with safeguarding guidance and transferred securely where required
- Staff records: 6 years after employment ends
- Behaviour and incident logs: Retained for safeguarding and legal compliance
- Video recordings (ABA or safeguarding): Retained only as long as necessary for educational, therapeutic, or safeguarding purposes and securely deleted in line with data minimisation principles

11. Your Data Protection Rights

Under UK GDPR, individuals have the right to:

- Access their personal data (Subject Access Request)
- Request rectification of inaccurate data
- Request erasure where legally applicable
- Restrict processing
- Object to processing
- Data portability
- Lodge a complaint with the Information Commissioner's Office (ICO)

ICO: www.ico.org.uk

12. Section A – Parents and Carers Privacy Notice

We process parent and carer data to:

- Communicate regarding pupil education, wellbeing and safeguarding
- Fulfil statutory safeguarding responsibilities
- Manage admissions, placements and EHCP provision
- Meet legal and regulatory obligations

Where appropriate, the school may use video recording as part of specialist autism and ABA provision to support pupil progress, staff training, and safeguarding. Parents are informed of this practice as part of the school's transparency obligations under UK GDPR.

Parents may request access to personal data held about their child in accordance with UK GDPR.

13. Section B – Pupil Privacy Notice (Child-Friendly Summary)

We collect information about pupils so we can:

- Help them learn
- Keep them safe
- Support their needs
- Provide therapy and specialist teaching

We keep pupil information safe and only share it with trusted adults who help support and protect them.

14. Section C – Staff and Volunteer Privacy Notice

We process staff and volunteer data for:

- Safer recruitment and DBS checks
- Safeguarding compliance
- Payroll and HR management
- Training and performance management
- Legal and regulatory compliance

15. Website and Cookies

Our website may collect limited personal data via:

- Contact forms
- Cookies and analytics
- Browser and device information

Cookies are used to improve user experience and can be managed via browser settings.

16. Policy Review and Governance

This policy is reviewed annually and monitored by school leadership and the Board of Trustees to ensure ongoing compliance with:

- Ofsted requirements
- Independent School Standards
- UK GDPR and safeguarding legislation

Revision

Version Update	March 2026
Review due	March 2027
Reviewed By	Sumen Starr
Approved by Board of Trustees on	March 2026