



Soar Play Therapy takes the responsibility around confidentiality, privacy and security of data seriously. Soar Play Therapy is fully committed to protecting personal information and using it properly in compliance with data privacy laws. **Soar Play Therapy** needs to collect and use certain types of information about the individuals who come into contact with **Soar Play Therapy** in order to carry out our work. This personal information will be collected and dealt with appropriately and there are safeguards to ensure this under the Data Protection Act 2018.

1. Aims

To ensure that all personal data collected about clients, parents and other individuals is collected, stored and processed in accordance with the General Data Protection Regulation (GDPR) and the provisions of the Data Protection Act 2018 (DPA 2018) as set out in the Data Protection Bill. This policy applies to all personal data, regardless of whether it is in paper or electronic format. This data protection policy serves the following objectives for Soar Play Therapy:

1. Compliance with data protection laws and best practices.
2. Safeguarding the rights of customers and partners.
3. Defining how we handle and process individuals' data.
4. Mitigating the risks associated with potential data breaches.

2. Legislation and Guidance

This policy meets the requirements of the GDPR and the provisions of the DPA 2018. It is based on guidance published by the Information Commissioner's Office (ICO) on the GDPR and the ICO's code of practice for subject access requests.

3. Data Controller

For the purpose of this policy the Data Controller of Soar Play Therapy UK is Amanda Woodhall. Play Therapy U.K acts as a joint Data Processor with Soar Play Therapy. Soar Play Therapy uses the client database management system Fortuna, supplied and maintained by Play Therapy U.K.

When based in schools, Soar Play Therapy Therapists follow school Data Protection and Privacy Policies of the school or organisation they are working in.

The Data Controller can be contact at info@soarplaytherapy.co.uk



4. Data Protection Principles

The GDPR is based on data protection principles that **Soar Play Therapy** must comply with. The principles say that personal data must be:

- Processed lawfully, fairly and in a transparent manner
- Collected for specified, explicit and legitimate purposes
- Adequate, relevant and limited to what is necessary to fulfil the purposes for which it is processed
- Accurate and, where necessary, kept up to date
- Kept for no longer than is necessary for the purposes for which it is processed
- Processed in a way that ensures it is appropriately secure

This policy sets out how **Soar Play Therapy** aims to comply with these principles.

5. Collecting Personal Data

Lawfulness, fairness and transparency

We will only process personal data where we have one of 6 ‘lawful bases’ (legal reasons) to do so under data protection law:

- The data needs to be processed so that the Soar Play Therapy can fulfil a contract with the individual, or the individual has asked the school to take specific steps before entering into a contract
- The data needs to be processed so that Soar Play Therapy can comply with a legal obligation
- The data needs to be processed to ensure the vital interests of the individual e.g. to protect someone’s life
- The data needs to be processed for the legitimate interests of the Soar Play Therapy or a third party (provided the individual’s rights and freedoms are not overridden)
- The individual (or their parent/carer when appropriate in the case of a pupil) has freely given clear consent. For special categories of personal data, we will also meet one of the special category conditions for processing which are set out in the GDPR and Data Protection Act 2018. We will only collect personal data for specified, explicit and legitimate reasons. We will explain these reasons to the individuals when we first collect their data. If we want to use personal data for reasons other than those given when we first obtained it, we will inform the individuals concerned before we do so, and seek consent where necessary. Staff must only process personal data where it is necessary in order to do their jobs.

6. What information do we hold and how do we use it?



1. We gather client information through spoken, written or electronic means from parents, caregivers, or relevant professionals. This can include special category data: date of birth, address, ethnicity, gender, reason for referral, medical history, developmental history.
2. If parents/carers consent, we may collect data from other professionals involved with the child, such as school, nursery or Social Care.
3. Data about family members may be collected if it pertains to the child, such as parent contact details and medical history.
4. We use monitoring data for example, Goodman's Strength and Difficulties Questionnaire (SDQ), to assess progress of therapy.
5. Any confidential client work produced during Play Therapy, like artwork or clay models, is securely stored and held until the end of the therapy episode.
6. Personal information from adults (therapists, teachers, counsellors, parents) related to purchases, workshops, and appointments is collected electronically.
7. Photos may be kept of the client's work (for example of sand tray and artwork) and is stored securely.
8. Correspondence between therapist and the client/carer and other stakeholders

7. How We Use Personal Information

We use personal data to:

1. Prepare, plan, and provide therapy services
2. For clinical supervision: All practitioners on the Register of Play and Creative Arts Therapists, managed by Play Therapy UK (PTUK) and accredited by the Professional Standards Authority, must have a set number of hours of clinical supervision. Discussions between the therapist and the PTUK supervisor about your child's sessions and details are anonymous and identifying details are not revealed. The clinical supervisor is utilised to improve and maintain the therapist's practice. If notes are taken, they are marked as confidential and stored securely.
3. To communicate with parents/guardians and stakeholders through various means, including confirming appointments, general communication, sending reports, resources, and invoices.
4. The therapist may suggest and signpost a parent/carer to another service or a course that may be suited to their situation. **Please inform the therapist if you do not wish to be informed of any external resources, or courses or other websites.**
5. With consent, relevant information may be shared with relevant professionals involved in the child's care (e.g teachers, relevant school staff working with the child, family support workers etc).



8. How Does Soar Play Therapy Protect Your Data?

We will protect personal data and keep it safe from unauthorised or unlawful access, alteration, processing or disclosure, and against accidental or unlawful loss, destruction or damage. In particular:

- Paper-based records and portable electronic devices, such as laptops and hard drives that contain personal data are kept under lock and key when not in use
- Papers containing confidential personal data must not be left on office desks or left anywhere else where there is general access
- Passwords that are at least 8 characters long containing letters and numbers are used to access school computers, laptops and other electronic devices. Staff are reminded to change their passwords at regular intervals
- Encryption software is used to protect all portable devices and removable media, such as laptops and USB devices
- Anonymised codes are used when storing the data on PTUK's Fortuna Database
- Personal identifiers are used when not needed for specific tasks
- Personal information is not disclosed to others unless required by law unless consented to. Information may be shared, without consent, in the interests of safeguarding (please see Safeguarding Policy)
- Client details are not sold or shared with third parties
- Encrypted email service is used sending sensitive information (Rmail)
- Sensitive information (for example reports) when sent are marked as 'confidential'.
- Docusign is used for electronic forms
- Records are securely kept until the client reaches their 26th birthday. Beyond this, they are securely destroyed
- For case studies -anonymised
- Any information collected during the referral process is disposed of securely if a parent/carer decides to not proceed to the next stage (therapy)
- Electronic data is stored on the PTUK's software system, **Fortuna**, which is a highly secure system provided by Play Therapy UK for the therapist to record your child's data. Name and address data of yourself and child/children are only processed by the therapist for communication purposes. They are not processed by Play Therapy UK except, if relevant, for the repair of the system. Neither are they released by Play Therapy UK to any other organisation or person, unless required to by law. When therapists submit information to Fortuna, anonymization codes are used. Play Therapy U.K only processes anonymised data. This allows Play Therapy UK to link the items of information for analysis without revealing your child's identity. Play therapy U.K uses this information for research purposes to assess how effective and efficient the service is for different types of children. When information is analysed



and reported on, it is based on groups of a minimum number of 200 cases and does not identify any individual child.

- Access to Fortuna is limited to the data controller and processor. The processor only accesses non-identifiable data used for research (as above) and clinical governance compliance. Data on Fortuna is stored securely within the European Economic Area (EEA) via Zoho data centres. It is backed up at a server level by the application suppliers.

9. Sharing Personal Data

We will not normally share personal data with anyone else, but may do so where:

- There is an issue with a client or parent/carer that puts the safety of our staff at risk
- We need to liaise with other agencies – we will seek consent as necessary before doing this
- We are obligated by law (e.g court ordered)
- There is a safeguarding issue (see Safeguarding Policy)

10. Your Rights

Data protection legislation grants clients various rights, including:

- The right to request a copy of the information we hold about the child. If the child is 16 years or older, their consent is required unless the client possesses power of attorney.

When responding to requests, we:

- May ask the individual to provide 2 forms of identification
- May contact the individual via phone to confirm the request was made
- Will respond without delay and within 1 month of receipt of the request
- Will provide the information free of charge
- May tell the individual we will comply within 3 months of receipt of the request, where a request is complex or numerous. We will inform the individual of this within 1 month, and explain why the extension is necessary

We will not disclose information if it:

- Might cause serious harm to the physical or mental health of the child or another individual
- Would reveal that the child is at risk of abuse, where the disclosure of that information would not be in the child's best interests
- Is contained in adoption or parental order records



- Is given to a court in proceedings concerning the child If the request is unfounded or excessive, we may refuse to act on it, or charge a reasonable fee which takes into account administrative costs. A request will be deemed to be unfounded or excessive if it is repetitive, or asks for further copies of the same information. When we refuse a request, we will tell the individual why, and tell them they have the right to complain to the ICO.

Additionally, you have the right to:

- Withdraw their consent to processing at any time
- Ask us to rectify, erase or restrict processing of their personal data, or object to the processing of it (in certain circumstances)
- Prevent use of their personal data for direct marketing
- Challenge processing which has been justified on the basis of public interest
- Request a copy of agreements under which their personal data is transferred outside of the European Economic Area
- Object to decisions based solely on automated decision making or profiling (decisions taken with no human involvement, that might negatively affect them)
- Prevent processing that is likely to cause damage or distress
- Be notified of a data breach in certain circumstances
- Make a complaint to the ICO
- Ask for their personal data to be transferred to a third party in a structured, commonly used and machine readable format (in certain circumstances)

Amanda Woodhall is registered with the Information Commissioner's Office www.ico.org.uk/register as the data controller for Soar Play Therapy (reference ZA307599). If you have any concerns about how we are handling your data, then please contact the ICO quoting this reference for further advice on how to query or complain.

For details of information held by Play Therapy UK, please contact:

Data Controller
Play Therapy UK
The Coach House
Belmont Road
Uckfield TN25 1BP.
Phone: 01825 761143
Play Therapy UK ICO registration (ZA107748)

11. Procedure for Data Breaches

Play Therapy Data Protection Privacy Policy



In the event of any breach, loss, damage, or improper access to confidential data, we will take the following steps:

1. We will reach out to the Information Commissioner's Office (ICO) to seek guidance on the appropriate actions to take.
2. If advised by the ICO, we will promptly notify the affected client regarding the breach.
3. Additionally, if advised by the ICO, we will contact any other relevant agencies or organisations necessary to address and mitigate the consequences of the breach.

12. Disposal of records

Personal data that is no longer needed will be disposed of securely. Personal data that has become inaccurate or out of date will also be disposed of securely, where we cannot or do not need to rectify or update it. For example, we will shred or incinerate paper-based records, and overwrite or delete electronic files. Records are securely kept until the client reaches their 26th birthday. Soar Play Therapy follows the retention of Record Guidance as set out by PTUK. [Retention of records](#)

13. Training

All therapists complete annual Data Protection Training.

This Policy was created on:

September, 2021

Updates:

September 2022

September 2023

January 2024

September 2024

September 2025

May 2026

I reserve the right to update my policy and inform you of any changes.

Play Therapy Data Protection Privacy Policy

