




## Data Protection and Confidentiality Policy

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<b>Policy Approved By:</b>	Sevcan SUNGUR
<b>Name:</b>	Sevcan SUNGUR
<b>Role:</b>	Director
<b>Signed:</b>	
<b>Date:</b>	10/04/2026



## 1. Introduction

Sun Play Therapy is committed to responsible handling of personal data belonging to employees, contractors, volunteers, students, and other stakeholders. We ensure personal information, whether digital or paper-based, is handled lawfully, transparently, and securely in line with the UK General Data Protection Regulation (UK GDPR).

## 2. Definitions

- **Personal Data:** Any information relating to an identifiable person.
- **Special Categories of Personal Data:** Sensitive data including health, race, sexual orientation, etc.
- **Criminal Offence Data:** Information relating to criminal records.
- **Data Processing:** Activities such as collecting, storing, using, or deleting personal data.

## 3. Data Protection Principles

We follow the seven key principles of UK GDPR:

- Lawfulness, fairness, and transparency
- Purpose limitation
- Data minimisation
- Accuracy
- Storage limitation
- Integrity and confidentiality
- Accountability

## 4. Data Collected

Sun Play Therapy collects and uses personal data for:

- Recruitment
- Pay and employment administration
- Health and safety compliance
- Safeguarding and incident reporting

## 5. Individual Rights

Under UK GDPR, individuals have:

- Right to be informed
- Right of access
- Right to rectification
- Right to erasure
- Right to restrict processing
- Right to data portability
- Right to object
- Rights regarding automated decision-making

## 6. Responsibilities

Sun Play Therapy ensures all staff and freelancers handling data are trained and aware of privacy responsibilities. Key roles are assigned to audit and oversee data protection compliance.



## **7. Lawful Bases of Processing**

We rely on legitimate interest, contractual necessity, legal obligation, and consent as appropriate. Consent is always clear, specific, and revocable.

## **8. Access to Data**

Subject Access Requests (SARs) are processed promptly. Procedures for handling SARs are outlined in the Data Request Appendix.

## **9. Data Disclosures**

Data may be shared with third parties such as HR providers, regulatory bodies, or emergency services, only when lawful and necessary.

## **10. Data Security**

Physical and digital security measures are enforced to protect data. These include secure servers, encrypted systems, password-protected files, and restricted access.

## **11. Third-Party Processing**

All third parties working on our behalf sign data protection agreements and comply with our standards.

## **12. International Data Transfers**

Sun Play Therapy does not transfer personal data outside the EEA.

## **13. Breach Notification**

All breaches are logged. Where required, they are reported to the ICO and affected individuals.

## **14. Training**

Regular training is provided to ensure all team members understand their responsibilities regarding data protection and confidentiality.

## **15. Records**

We maintain a full register of processing activities, including lawful basis, data type, and retention periods.

## **16. Confidentiality Purpose**

The Confidentiality Policy ensures that all stakeholders understand how confidential information and personal data must be handled and protected in SunDrama.

## **17. Confidentiality Principles**

- All data must be stored securely and accessed only by authorised individuals.
- Confidential records no longer needed must be shredded or deleted securely.
- Emailing identifiable information must be encrypted (e.g., using Egress).



## 18. Breaches of Confidentiality

Confidential information may only be disclosed where:

- There is risk of harm to an individual or the public
- Disclosure is required by law In such cases:
  1. Raise concern with the manager.
  2. Discuss justification and evidence.
  3. The manager decides whether disclosure is necessary.

## 19. Legal Compliance

This policy complies with the Data Protection Act 2018 and UK GDPR. It is regularly reviewed to meet all legal and regulatory requirements.

## 20. Whistleblowing

Concerns about breaches or misuse of data must be reported in accordance with the Whistleblowing Policy.

## 21. Data Protection Lead

**Name:** Sevcan Sungur

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