This privacy notice explains how Ēpiónē Psychotherapy Partners (Ēpiónē PP) will collect, use and protect your personal data when providing you with services.

**How and why will your personal data be processed?**

Ēpiónē PP is the responsible data controller for your personal data. This means we are responsible for safeguarding your data in accordance with the UK GDPR (UK General Data Protection Regulation) and Data Protection Act 2018.

Ēpiónē PP will process your data to the extent that is necessary to provide you with clinical care. It will be necessary for other members of the team, who may be involved in your care, to have access to information about you, on a need-to-know basis. This will include therapists, administrators, and supervisors.

Once you agree to receive this service, your data will be processed as above and, only where necessary.

Where it is within your expectations, it may also be necessary for us to share information with people you live with, other family members/friends/supporters, with your consent, and any named person/organisation you may be working with e.g., GP, Psychiatrist, Occupational Health, Human Resources, manager etc.

There may be some circumstances where agencies may be required, in the public interest, to disclose information that would otherwise be kept confidential. Examples of this include where a child is at risk, or where there is evidence of serious criminal activity.

**What is the legal basis for our use of your personal information?**

The lawful basis that Ēpiónē PP relies upon to process your personal data is:

* UK GDPR Article 6(1)(e) we need it to perform our public task
As extra protection is provided for certain classes of information called 'special category personal data' such as health information, an additional lawful basis must be identified in order to process these classes of information, as outlined below:
* UK GDPR Article 9(2)(h) – processing is necessary for provision of health and social care
* UK GDPR Article 9(2)(g): processing is necessary for reasons of substantial public interest – as detailed in Schedule 1, Paragraph 8 of the Data Protection Act 2018: Equality of opportunity or treatment.

**How we store your personal information?**Your information will be stored securely and kept in accordance with the [Records Management Code of Practice for Health and Social Care 2021](https://transform.england.nhs.uk/information-governance/guidance/records-management-code/) (England) [[Records Management Code of Practice for Health and Social Care 2022](https://www.gov.wales/sites/default/files/publications/2022-03/records-management-code-of-practice-for-health-and-social-care-2022.pdf)](https://www.gov.wales/sites/default/files/publications/2022-03/records-management-code-of-practice-for-health-and-social-care-2022.pdf) (Wales). The data management system that Ēpiónē PPuses is [BACPAC](https://bac-pac.co.uk/) and information is held in accordance with ICO Conditions.

 **Your rights**
Under data protection law, you have rights including:

* Your right of access - You have the right to ask us for copies of your personal information.
* Your right to rectification - You have the right to ask us to rectify information you think is inaccurate. You also have the right to ask us to complete information you think is incomplete.
* Your right to restriction of processing - You have the right
to ask us to restrict the processing of your information in certain circumstances.
* Your right to object to processing - You have the right
to object to the processing of your personal data in
certain circumstances.
* You are not required to pay any charge for exercising
your rights. If you make a request, we have one month
to respond to you.

If you have a concern about the way in which your personal data has been processed, you can complain directly to the Data Protection Officer at Ēpiónē PP.

**Ēpiónē PP Data Controller**

Cheryl Jones (ICO Registered)

For any other questions about purpose of data collection please contact:

Email: Cheryl@epione-psychotherapy.co.uk

**You also have the right to complain to the Information Commissioner’s Office using the following details:**

**Online:** <https://ico.org.uk/>

**By post:** The Information Commissioner's Office, Wycliffe House, Water Lane, Wilmslow, Cheshire, SK9 5AF

**Telephone:** 0330 414 6421

Further advice and guidance from the ICO on this issue can be found on the [ICO website](https://ico.org.uk/for-organisations/data-protection-and-Coronavirus/).

**Confidentiality Statement for Psychotherapy**

Confidentiality will be maintained within the codes of ethics and legal **requirements.  Confidentiality does not apply where it would mean that your therapist, might break the law or where withholding information means they would breach their codes of ethics (**[**British Association of Behavioural and Cognitive Psychotherapy**](https://babcp.com/Standards)**,** [**British Psychological Society**](https://www.bps.org.uk/guideline/code-ethics-and-conduct) **and** [**International Employee Assistance Professionals Association**](https://eapassn.org/page/ethicsandcodes)**).  Confidentiality may be breached if your therapist considers there is a risk you may harm yourself or others.  In such exceptional circumstances, where there is concern for your well-being or that of others, it may be necessary to seek help outside the therapeutic relationship. In such an event where there is a need to consider breaching confidentiality, you will normally be consulted first.

In the case of a disclosure concerning acts of terrorism, vulnerable adult or child protection issues or drug trafficking, confidentiality will be breached, and such disclosures will be passed onto the relevant authority without delay.  Due consideration will be exercised before disclosing anything of a previously unreported criminal nature, as your therapist is obligated to contact relevant authorities.**

**As part of my code(s) of practice your therapist is required to carry out continuing professional development, and to engage in regular on-going clinical supervision.  This is to ensure an ethical and professional service to individuals. Your therapist may discuss cases in supervision but would not use any identifying details, to protect confidentiality.**