

The Student Counselling Service (SCS) Confidentiality and Data Protection Statement

1. Introduction

This should be read in conjunction with the [University's student personal data fair processing notice, Data Protection Guidelines, Safeguarding policy](#) and other University [policies](#).

The Student Counselling Service (SCS) Confidentiality and Data Protection Statement covers all services that are provided to students and staff. These include counselling and counselling related services to any students of the University and any advice and support to staff in the University on matters relating to counselling and psychological health.

The Student Counselling Service (SCS) is part of the Student Services division. The division is comprised of [Disability Services](#), [Multifaith Chaplaincy](#), [Residential Life Service](#), [Student Counselling Service](#), [Students' Health Service](#), Student Inclusion Service and Student Wellbeing Service.

The Student Counselling Service (SCS) is an organisational member of the [British Association for Counsellors and Psychotherapists \(BACP\)](#). This places commitment on its members to observe and abide by the [BACP Ethical Framework for the counselling professions](#) and BACP membership policies and protocols.

The Student Counselling Service (SCS) is a confidential service. This covers the registration process, any forms you complete, the content of sessions and any other interventions you receive from the service. **However, there are limitations to privacy and confidentiality due to statutory duties where the law requires disclosure, or if there is imminent risk of harm to self and others.**

To provide you with the best service confidentiality is held within the counselling service and not by the individual counsellor and to optimise their work with you all counsellors review their work regularly with a clinical Supervisor as required by the BACP.

Confidentiality applies to students as clients of the service not parents or 3rd parties who may contact the service.

The Student Counselling Service (SCS) has a 'working agreement' that establishes the parameters in which counselling or support will take place. This covers confidentiality, the 'Opt in' policy, the students and SCS' responsibilities, attendance, liaison with others, and communication with the service.

Administrative staff and all external consultants delivering services to, or for, Student Counselling Service (SCS) are also bound by the SCS Confidentiality Statement (this will then include external group facilitators, supervisors, trainers, management consultants etc).

The Student Counselling Service (SCS) confidentiality Statement applies for groups. Students should protect the confidentiality of groups members i.e. not share any information disclosed by another member of the group or personal details such as name, course, level of study or any other information that may lead to the student being identified.

The Student Counselling Service (SCS) confidentiality Statement applies to the Mental Health Advisory Service (MHAS) as the MHAS is part of the Student Counselling Service (SCS).

This statement seeks to cover all the key areas relating to confidentiality in the Service, but it provides a framework rather than a rule book. In any given situation staff will need to use their professional judgement and consult when needed to make the best decisions they can, balancing your needs, the staff member, the Student Counselling Service (SCS), BACP principles for ethical decision making and the wider University.

2. How do we gather your consent?

We gather consent at two stages: registration and first appointment

a) Registration

We believe that you need to access the most appropriate support to meet your needs, so the Student Counselling Service (SCS) will identify what we believe to be the most suitable and available support at the time you contact us. This could be one to one counselling or joining a therapeutic group within our service, or it could be having support from another support service at the University or recommending you contact [external services](#).

We will ask your permission at registration to **only** share information with UOB Student Support Services, such as the Student Wellbeing Service, [Disability Services](#), [Students' Health Service](#), [Residential Life Service](#) and Sports Exercise and Health (for the [Healthy Minds](#) programme).

b) First appointment

As part of the first appointment. You will:

- confirm you have read the confidentiality statement
- establish the limits of confidentiality
- have the opportunity to update consent to liaise with other services
- sign the working agreement
- receive a post-initial consultation e-mail

You can decline consent to liaise at any stage, but this may affect the support we can offer. We advise you to explore and discuss consent during your initial consultation.

You can update your consent at any time. To do this please talk to your counsellor or Mental Health Advisor or email the service at student-counselling@bristol.ac.uk.

3. Limitations to privacy and confidentiality

In most situations we do not need to share information with anyone outside of the service.

However, the Student Counselling Service (SCS) cannot offer complete confidentiality. There are limitations to privacy and confidentiality due to statutory duties where the law requires disclosure, if there is imminent risk of harm to self and others (to protect your vital interests or those of another person) and in the event of serious illegal activities. The Student Counselling Service (SCS) will follow the [Mental ill health emergency response protocol](#) and the [Student Emergency Contact Procedure](#).

We have a whole institution approach to supporting student wellbeing. At times we may need to share information or work with others to provide multi-disciplinary support. We always seek and record your consent in the Student Agreement Document.

Emergency contact: The University has an 'opt in' policy regarding contacting an emergency contact if you are having a mental health crisis. If you have consented for your emergency contact to be informed, the Student Counselling Service (SCS) will inform the Student Wellbeing Service, or Resident life Service so they can implement this policy. If you have not consented to 'opt in' or changed your mind, the Student Counselling Service (SCS) will follow the [Mental ill](#)

[health emergency response protocol](#), the Student Counselling Service's internal risk management policy and the [Student Emergency Contact Procedure](#).

Complaints: If you're not happy with the service you have received we ask that in the first instance you to talk to the member of staff you have been having support from. If this is not possible, or if you feel the issue has not been resolved please email the service at student-counselling@bristol.ac.uk for the attention of the Head of Service.

Press, media and social media: If you are wanting to share an experience about the service to the media we ask that you contact the service to make sure that the confidentiality of others is not breached before you share any information publicly.

Social media: Staff and students should not communicate with each other via social media.

Coroner's investigations and inquests: The right to confidentiality extends beyond death. However, the Student Counselling Service (SCS) will share information if this is requested by law (statute or court order), the student had consented, or if it is deemed by the Head of the Counselling Service/University's Secretary's Office to be in the public interest. If Student Counselling Service (SCS) has concerns about the extent to which information from therapy is relevant to the inquiry, we would request a discussion with the Coroner prior to the court appearance via lawyers in the University's Secretary's Office.

Court procedures: This is a complex area of counselling and support. If you are a victim of crime, are likely to be called as a witness to a crime or have been accused of a crime please let us know. ['It is important any support you receive should be sound and have an informed understanding of the court process and not prejudicial and thereby undermine the perception of the credibility and reliability of a witness, or to influence memory of the witness as to events or the account they give'](#). It is important to understand that a court can order all notes and records to be submitted in a court case and that ['appropriate therapy'](#) (type of therapy and focus) takes place. **Please also see release of notes section.**

Parents and concerned friends: If a parent or a friend approach the service to express concern for you, the Student Counselling Service (SCS) will record the information shared but will protect your confidentiality. If through conversations with parents or friends it becomes clear that there is the risk that you may harm yourself or others, the Student Counselling Service (SCS) will direct them to, or liaise with, the Student Wellbeing Service. Parents and concerned friends can also use the [report and support tool](#).

Liaison with academic departments: If members of academic departments approach the service to express concern for you, the Student Counselling Service (SCS) will record the information shared and will protect your confidentiality. If through conversations with academic departments it becomes clear that there is the risk that you may harm yourself or others, the Student Counselling Service (SCS) will direct them to, or liaise with, the Student Wellbeing Service or Resident life Service.

Student Counselling Service (SCS) will liaise with academic departments **only** if you have consented for this to happen, unless liaison falls with the limitations highlighted in this policy.

Liaison with academic departments regarding [extenuating circumstances \(EC\)](#): If you wish to apply for [EC](#), you can submit as evidence any e-mails received from Student Counselling Service (SCS) that record appointment offers and registration with the service as well as submitting the post-initial consultation e-mail. If academic boards require more in-depth information, this can be provided by the duty manager in Student Counselling Service (SCS) by a phone conversation, **provided we have your consent to liaise.**

Child protection/Safeguarding: If it is thought that there is a serious risk to a child the service will follow the University [Safeguarding policy](#), the guidelines laid down by [child protection legislation](#) and the Student Counselling Service (SCS) internal risk management policy.

Liaison with external agencies: Student Counselling Service (SCS) can liaise with external agencies or professionals if you have consented for this to happen or if you are at **imminent** risk of harm to self or others as highlighted in this policy.

Liaison with UOB Student Services: Student Counselling Service (SCS) can liaise with UOB Student Services if you have consented for this to happen or if you are at **imminent** risk of harm to self or others. This can take place in the form of a one to one conversation, a multi-disciplinary meeting or a written note (for example to the Student Health Service).

Research/professional development: Student Counselling Service (SCS) staff will always seek your consent (using the CPD Client Consent Form) to use your information in any research, training or professional development such as [BACP accreditation](#) and will always endeavour to protect your identity.

Fitness to Study: [Fitness to study](#) relates to your capacity to participate fully and satisfactorily as a student in relation to academic studies and life generally at the University of Bristol.

If you tell us that you do not feel fit to study, or if we have concerns that you are not fit to study, we will explore this with you within the support we are providing and suggest that you talk to the Student Wellbeing Service or Resident life Service and your personal tutor/supervisor.

Student Counselling Service (SCS) will always attempt to work collaboratively with you. Student Counselling Service (SCS) will only break confidentiality if we believe that you or a member of the public could be at risk of harm. We would also follow the [Mental ill health emergency response protocol](#) and the Student Counselling Service's internal risk management policy.

It would not be appropriate for Student Counselling Service (SCS) staff to attend fitness to study case reviews or fitness to study panels. With your consent Student Counselling Service (SCS) may contribute information to the fitness to study process.

Fitness to Practice: If you are enrolled in a Professional Programme you must refer to your department's documentation (as applicable to your profession) in order to make yourself aware of the principles of professional behaviour and the professional behaviour expected of you.

If you tell us that you do not feel fit to practice or if we have concerns that you are not fit to practice we will explore this with you within the support we are providing and suggest that you talk to the nominated person in your department and the Student Wellbeing Service or Resident life Service.

Student Counselling Service (SCS) will always attempt to work collaboratively with you. Student Counselling Service (SCS) will only break confidentiality if we believe that you or a member of the public could be at risk of harm. We would also follow the [Mental ill health emergency response protocol](#) and the Student Counselling Service's internal risk management policy.

It would not be appropriate for Student Counselling Service (SCS) staff to attend fitness to study case reviews or fitness to practice panels. With your consent Student Counselling Service (SCS) may contribute information to the fitness to practice process.

Student death: The BACP Ethical Framework commits members to “...*protect the confidentiality and privacy of clients by actively protecting information about clients from unauthorised access or disclosure.*’ If a student has died, that principle still stands, but although confidentiality may have been agreed with the student during their lifetime, it may be breached at any time if the student has consented, the law requires disclosure (e.g. statute or a court order) or disclosure is in the public interest, as this can justifiably override the client’s wishes.

4. How we process and protect your data

Storage of counselling records: Student Counselling Service (SCS) keeps your records on an electronic system called [CORENet](#). Your information is encrypted on a secure sever. CORE IMS has formal accreditation to ISO27001 from BSI (the British Standards Institute). ISO/IEC 27001 is the internationally recognised standard for information security. All data is hosted in business grade datacentres within the EU (as required by EU law). Only Student Counselling Service (SCS) staff have access to CORENet. The system has double bind security and is password and key fob protected.

We follow the [University guidance](#) on the storage and use of student data.

Release of notes: You have the right to see your notes and/take away a printed copy of these. You need to put forward your request by emailing the service on student-counselling@bristol.ac.uk.

The notes will be checked by a Duty Manager to ensure that reading them will not cause undue harm to yourself or breach any duty of confidentiality owed to another. Any suggested redactions may be checked and approved by the [Secretary’s Office](#) (the University legal team). Then you will be invited to read them in the presence of a counsellor who can offer support and explanation if required and to sign a release of notes form. You will also be informed of the implications of releasing your notes. **Please see court procedures.**

For all of your rights in relation to the processing of your personal data by the University please see the University [Student personal data fair processing notice](#).

General Data Protection Regulation (GDPR): The Student Counselling Service (SCS) and the University need to collect and process personal data in order to function effectively as an educational institution and to provide you with the support you require while undertaking your studies. Personal data is processed for a variety of reasons (as set out in the [Student personal data fair processing notice](#)) and all such personal data will be collected and processed in accordance with the requirements of the General Data Protection Regulation (GDPR) and the Data Protection Act 2018.

Questions or comments

If you have any questions or comments regarding this notice or you wish to exercise any of your rights (as set out in the [Student personal data fair processing notice](#)), you should contact our Data Protection Officer by email at data-protection@bristol.ac.uk or by phone on ext. 41824.

For more information contact us:

Phone 0117 394 0123

Email student-counselling@bristol.ac.uk

www.bristol.ac.uk/student-counselling

5. SCS Working agreement and consent

5.1 Privacy statement

The Student Counselling Service and the University need to collect and process personal data in order to function effectively as an educational institution and to provide you with the support you require while undertaking your studies. Personal data is processed for a variety of reasons as set out in the [Student personal data fair processing notice](#).

What information does the Student Counselling Service keep?

We keep administrative and clinical records of all contacts with you, all liaison with services and all supervisory processes.

How long do we keep information for?

We keep records for 6 years following data protection legislation.

What does the Student Counselling Service use my information for?

To inform and direct counselling and the support you receive. Anonymised data is used in reports to the University and others to account for service use, impact and effectiveness of counselling.

Why do we ask for your consent to liaise with others?

In order to offer joint or multidisciplinary care and joint working to support students with multiple needs your consent is needed for us to liaise with other services. Other services or staff in the University will use information we provide to inform the support they provide for you.

What do we share with others?

We will always share information on a need to know basis, only sharing what is needed.

How long is consent given for?

Consent is given for the duration of your time at University. You can change your consent at any time by emailing the service on student-counselling@bristol.ac.uk.

You can decline consent to liaise at any stage, but this may affect the support we can offer. We advise you to explore and discuss consent in your initial consultation.

There are limitations to privacy and confidentiality due to statutory duties where the law requires disclosure, if there is imminent risk of harm to self and others (to protect your vital interests or those of another person) or in the event of serious illegal activities. The Student Counselling Service will follow BACP guidelines, [Mental ill health emergency response protocol](#) and the [Student Emergency Contact Procedure](#).

Questions or comments

If you have any questions or comments regarding this notice or you wish to exercise any of your rights (as set out in the [Student personal data fair processing notice](#)), you should contact the duty manager in the Student Counselling Service and the University Data Protection Officer by email at data-protection@bristol.ac.uk or by phone on ext. 41824.

5.2 Working agreement

Having registered with the Student Counselling Service (SCS)

I agree:

- To give 48 hours' notice where possible should I wish to cancel any appointments or group sessions offered.
- To contact the office by phone +44 (0)117 394 0123 or email: student-counselling@bristol.ac.uk should I wish to cancel any appointments or group sessions offered.

I understand that:

- During the first session of a 'Block of Counselling' I will have the opportunity to schedule my counselling sessions with my counsellor.
- For 'One at a time Sessions' If I need another appointment, I will schedule this next appointment with my counsellor in the session if possible.
- After this process of agreeing appointment times I will lose any cancelled sessions.
- The SCS works according to the guidelines and Ethical Framework for Good Practice in Counselling and Psychotherapy produced by the British Association for Counselling and Psychotherapy, of which the SCS are a member.
- I can work in consultation with SCS staff in choosing group or 1:1 sessions and reviewing what is appropriate to my needs.
- If I wish to change counsellors I will speak with my counsellor about this in the first instance. If this is not possible I will email the service at student-counselling@bristol.ac.uk. A duty manager will then explore this with me and if needed change my counsellor.
- SCS will always endeavour to give me good notice if for any reason my session needs to be cancelled or re-arranged.
- If I have any concerns about the counselling I have received I should raise this with my counsellor or group facilitator in the first instance and then, if necessary, with the Head of Service by email to student-counselling@bristol.ac.uk. The SCS will respond quickly to any complaints made and seek to correct any errors on their part.

5.3 Consent form

I confirm that I have read and understood the ‘SCS Confidentiality and Data Protection Statement’.

I confirm that I give the Student Counselling Service my consent to liaise (share information about me) with the following services if necessary, on a confidential basis, for my time at university. *I understand that I can withdraw my consent at any time.*

Yes No Student’s Health Service/or my GP

Yes No Student Services (Student Wellbeing Service, SHERPA, [Disability Services](#), [Multifaith Chaplaincy](#), [Residential Life Service](#), [Students’ Health Service](#) and the Student Inclusion Service)

Yes No Sports Exercise and Health (for Healthy Minds programme)

Opt in ‘The University of Bristol strongly supports working closely with families. Obtaining information from, and listening to, the concerns of families can be key in determining risk. We recognise however that some people do not wish to share information about themselves or their care with family, or with certain individuals. Practitioners should therefore discuss with people how they wish information to be shared, and with whom. Wherever possible, this should include what should happen if there is serious concern over suicide risk.’

Do you consent for opt in to be used? Yes No

Please record the student's wishes regarding sharing information with their emergency contact. Please add a date by any information you add or updates you make.

Yes No Academic Department (i.e. for extenuating circumstances or welfare issues)

Yes No Other appropriate professionals within and outside the university on a confidential basis, such as NHS mental health teams, SU-advice centre, 3rd sector services, or any others that may arise.

Please add any names of individuals that are supporting you, or any further information around consent.

I understand that there are limitations to privacy and confidentiality due to statutory duties where the law requires disclosure, if there is imminent risk of harm to self and others (to protect my vital interests or those of another person) or in the event of serious illegal activities.

Print Student full name

Sign by student **date**

Sign by counsellor **date**

Print counsellor full name