

# COUNSELLING SERVICE

## Code of practice on confidentiality and data protection

This document outlines our responsibilities and practices in respect of information about students and explains our policies on confidentiality, data sharing and data protection.

The RCM Counselling Service comprises 3 permanent, part-time counsellors and is managed by the Student Services Manager. The service also engages associate counsellors (who are completing their training). The associates are closely supervised by our permanent counsellors and work to the same professional standards.

## Confidentiality

Staff of the RCM Counselling Service will not pass on personal information about a student (including information on attendance) to anyone outside the service subject to the following exceptions:

- Where a member of the RCM Counselling Service has the express consent of the student to disclose the information or data.
- Where a member of the RCM Counselling Service would be liable to civil or criminal procedure if the information was not disclosed.
- Where a member of the RCM Counselling Service believes the student, or someone else, is in serious danger or is at risk to themselves or to others.

In any of these circumstances, counsellors will normally encourage the student to pass on information to the relevant person/agency themselves. If there is no indication that this has happened, and if the crisis or danger is sufficiently acute, counsellors may pass on the information directly. Counsellors may discuss this with the Student Services Manager, in line with the [RCM's Mental Health Policy and Policy on Students of Concern](#) and the Service Data Sharing Agreement (below).

Consent to disclose information will be sought from the student, if possible.

When a student refers themselves to the service, the information they share on the self-referral form is viewed by the permanent RCM counsellors and is stored securely on IT systems. If a student discloses information on the self-referral form that indicates that either they or others could be at risk, this will be shared with the Student Services Manager to ensure that additional support can be offered, and any concerns appropriately responded to.

## Service Data Sharing Agreement

Counsellors will share anonymised data concerning the number of student referrals, waiting times, trends relating to issues being presented, demographic information and student feedback with the Student Services Manager for the purpose of monitoring and reporting on the service.

Counsellors may share non-anonymised information with the Student Services Manager, in the following instances:

- where they have the express consent of the student to do so.
- where they believe a student, or someone else, is in serious danger, at risk to themselves or to others (in line with the [RCM's Mental Health Policy and Policy on Students of Concern](#)). This includes any disclosures made on the Counselling self-referral form.
- where the Student Services Manager has asked if, and when, a student has self-referred or accessed the service for the purpose of checking engagement (in line with the [RCM's Mental Health Policy and Policy on Students of Concern](#))

## Supervision

In line with their professional requirements, the counsellors may discuss their work with an external supervisor. In this process the identity of the student is not revealed. The purpose of supervision is to help the counsellor reflect on their work.

## Liaison and correspondence

With the express permission of the student, it may be appropriate for their counsellor to liaise with or write to a third party, for example a member of College administration, a professor or General Practitioner.

## Record keeping, data protection and security

All notes and records are kept securely locked within the RCM Counselling Service. It is essential for counsellors to keep notes. Counselling notes record attendance and any issues of concern needing follow up or further referral. Individual counsellors will anonymise notes as far as possible, store them securely and will not share them with anyone else. In line with legal requirements, counselling notes are kept for a period of seven years. After this time, they are securely destroyed.

## Access to notes

Under the General Data Protection Regulations, students have a right of access to all notes on file about them. If these notes contain references to other individuals, they may not be made available as protection is also granted to third parties. Some notes may be in shorthand and need explaining, so it will be important for the counsellor to have the opportunity to talk to the student about what their file contains and why. If a student wishes to see their file, they should request this from their counsellor giving two weeks' notice.

## Codes of ethics

The counsellors adhere to the codes of ethics and practice for their relevant professional bodies (the British Association of Counsellors, UK Council for Psychotherapy or British Association for Behavioural and Cognitive Psychotherapists). Copies of these are available from the Service upon request.

All clients using the RCM Counselling Service will be asked to sign a form to say that they have read and understood the Code of Practice on Confidentiality and Data Protection.

Updated: July 2024