

COUNSELLING SERVICE

Code of practice on confidentiality and data protection

The RCM Counselling Service is part of the Student Services Department. Our permanent, part-time RCM counsellors are available during term-time. We also engage associate counsellors (completing their training), who are closely supervised by our permanent RCM counsellors and work to the same professional standards.

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

What happens to my data when I refer myself to counselling?

When a student completes a self-referral form, this is received by the RCM Counselling service. Responses to demographic questions are stored in a secure database, maintained by the Student Services Manager and RCM counsellors for the purpose of monitoring and anonymous reporting on referral data, such as demographics and trends relating to presenting issues.

Responses to the remaining questions are stored securely as a paper copy in locked filing cabinets and deleted from IT systems. If a student discloses information that indicates that either they or others could be at risk, they will be contacted by the Student Services Manager so that additional support can be offered, and any concerns appropriately responded to.

Confidentiality

Staff members of the RCM Counselling Service will not pass on personal information about a student (including information on attendance) to anyone outside of the service without the student's express consent, subject to the following exceptions:

- When a member of the RCM Counselling Service believes the student, or someone else, is in danger or is at risk to themselves, to others or to the College (in line with RCM's Mental Health Policy)
- When there are significant concerns about a student's wellbeing or engagement in studies and/or where the Policy on Students of Concern has been initiated and it is necessary to share information about counselling attendance and engagement with the Working Group, on a strictly need-to-know basis
- If a student imparts information relating to criminal activity or planned criminal activity (including terrorism)
- When a disclosure is required by law, in line with the Data Protection Act 2018
- When the student is under 18 and there is a child protection concern

Where appropriate, students will normally be encouraged to pass on information to the relevant person/agency themselves. If there is no indication that this has happened, and if the concerns are sufficiently acute, members of the RCM Counselling Service staff may pass on the information directly. Where possible, consent to disclose information will be sought from the student. RCM counsellors may discuss any concerns with the Student Services Manager, in line with the RCM's Mental Health Policy and Policy on Students of Concern. Please refer to the Student Services Privacy Statement for information about when the Student Services Manager may need to share information outside of the department.

Supervision

In line with their professional requirements, the RCM 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 (GP).

Record keeping, data protection and security

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

Access to clinical notes

Under the UK General Data Protection Regulations (GDPR), students have a right of access to all clinical notes on file about them. If these clinical 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 notice of one calendar month.

Codes of ethics

The RCM 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 students 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 before proceeding.

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