

**Imperial College Union
Advice Service
Confidentiality Policy**

Free | Confidential | Independent | Impartial | Informative

1. Introduction

1.1 Imperial College Union (ICU) represents the students at Imperial College London (ICL). ICU exists to prepare its members to be tomorrow's leaders, by defending and enhancing the student experience at Imperial, through the provision of innovation services, representation, and activities. The ICU Advice Service fulfils this duty by offering advice to all ICL Students. This includes students who study part-time and those who have taken an interruption of studies.

1.3 This policy sets out the Advice Service's approach to confidentiality, as set out in the definition written in this document.

2. Definition of confidentiality

2.1 By confidentiality, ICU means that: no information (except in circumstances as defined in Section 5 below) regarding a student shall be given either directly or indirectly to any third-party external to the ICU Advice Service staff and the Managing Director without that student's prior written consent or in an exceptional circumstance.

3. Confidentiality in practice

3.1 The ICU Advice Service will keep your information and case confidential in the following ways:

- Storing information on an online confidential case management system that can only be accessed by Advice Service staff
- Holding meetings with the student in a confidential space
- Not contacting another member of staff outside of the Advice Service without written permission to do so from the student
- Withholding information about the Advice Service or the case on the telephone until they are confident they are speaking to the student
- Withholding information from third parties (including parents, carers, friends and guardians) asking for information about the case without written consent from the student to do so
- Disposing of physical documents in a confidential waste bin
- Storing physical documents (if necessary) in a locked cabinet
- Making all ICU staff aware of the Advice Service Confidentiality policy

3.2 When a student signs up to the service, the ICU Advice Service will ensure that they collect written confirmation that the student has read the terms and conditions of the service, including the confidentiality policy.

3.3 If the student contacts the ICU helpdesk or any Union inbox with a query or information pertaining to a case, the student will be asked to contact the Advice Service on the correct email directly, or will be sent the Client Registration form. Emails forwarded from other Union or College inboxes will not be considered until the student contacts the Advice Service directly through their College email account, either by email or through the Client Registration form. Imperial College Union staff who do not sit within the Advice Service will be instructed to delete any confidential email from their inbox.

3.4 The ICU Advice Service does not take responsibility for any items or paperwork that are left in the care of ICU staff outside of the Advice Service. It is recommended that students transfer documents via email to the Advice Service directly.

3.5 Students can request to see their record if they so wish and should do so by submitting a written request to the Advice Manager. It can take up to two weeks to provide this information.

3.6 All records will be kept for as long as necessary to fulfil the purpose we have collected it for, as per the Imperial College Union Privacy Notice.

4. Data Collection

4.1 The ICU Advice Service collects data through the student registration form and the Service feedback form. These enable the Service to monitor how the service is used and to identify trends and policy issues that may arise.

4.2 The processing of these data will not enable staff or a third party to identify a student.

4.3 Occasionally, sample case work will be used in reports or for training purposes. These will be anonymised so students cannot be identified.

5. Breaking Confidentiality

5.1 On rare occasions the ICU Advice Service may need to break a student's confidentiality. There are three legal exceptions when confidentiality may be broken, whereby there is a duty on the Advice Service staff team to report information given to them:

- Terrorism - under the Terrorism Act 2000, it is an offence for a person holding information about acts of terrorism to fail without reasonable excuse to disclose that information.
- Drugs and money laundering - the Drug Trafficking Act 1994 makes it a criminal offence to fail to report to the police suspicion or knowledge of drug money laundering gained during student contact. The Service will normally be required to disclose this information.
- An issue relating to child protection or abuse.

5.2 The ICU Advice Service will also break confidentiality for the following reasons:

- If a court of law has requested information pertaining to a case
- If the student is at risk of harming themselves or other.

5.3 If the latter is the case, the ICU Advice Service staff will consult with the College's Student Services for guidance.

5.4 The student will be informed that their confidentiality will be broken unless there is a risk to the safety of the student or others.

5.5 A break of confidentiality might also occur unintentionally when there is a conflict of interest. Our Conflict of Interest Policy defines and sets out the process for this.

6. Fraudulent claims

6.1 If any member of the ICU Advice Service staff team has identified that a student has made a fraudulent claim, then the Advice Service will withdraw services and signpost them to a separate service.

6.2 ICU Advice Service will inform the student that their details will not be disclosed to any external parties.

7. Reviewing and monitoring the Confidentiality Policy

7.1 This policy will be reviewed by the Deputy President Welfare, the Advice Manager and the Representation and Advice Manager every two years, unless a significant change occurs within that time period.

7.2 Any occasions where confidentiality is broken will be listed in the annual Advice Service report to Board.