

**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 (The College). 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 Imperial College Students. This includes students who study part-time and those who have taken an interruption of studies.

1.2 This policy sets out the Advice Service's approach to confidentiality, as set out in the definition written in this document, chiefly this policy will outline the rare occasions where we must break confidentiality.

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 without that student's prior written consent or in an exceptional circumstance.

3. Confidentiality in practice

3.1 We protect your privacy by securely storing your information in a system only our staff can access. We ensure that meetings are private, and we use recording devices only with your permission. The specific measure we take include:

- Limiting access to data stores to service staff only, this includes Advice Pro and emails.
- Holding meetings with the student in a confidential space and with permission of the student using a Dictaphone note taking tool.
- Not contacting another member of staff outside of the Advice Service without written permission to do so from the student, we require this in writing (over message or email) to proceed.
- Staff will withhold 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.
- Making all ICU staff aware of the Advice Service Confidentiality policy.

3.2 When a student signs up to the service through the advice request form the student is informed, that they are agreeing to the ICU Advice Service Standards policy, Confidentiality policy and the Conflict-of-Interest 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 using the request form or email directly. Imperial College Union staff who do not sit within the Advice Service will be instructed to delete confidential emails 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.

3.7 All our staff receive regular training on confidentiality and data protection principles. This training ensures that everyone handling your information understands their responsibilities and the importance of protecting your privacy.

4. Data Collection

4.1 The ICU Advice Service collects data through the Advice Request 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.

4.4. We have a designated Data Protection Officer to ensure your information is handled securely and in compliance with privacy laws. If you have any concerns or questions about how your information is managed, please contact our Data Protection Officer at union@ic.ac.uk.

5. Breaking Confidentiality

5.1 Sometimes, we must share information for legal reasons or to prevent harm. This includes situations involving terrorism, suspected money laundering, or concerns about child safety and abuse. More detail is listed below.

- 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 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.