

# Student and Academic Services Confidentiality Statement

#### 1. Introduction

At the University of Greenwich, we are committed to working with you to support your wellbeing.

This statement applies to both prospective and current students. The term 'student' in this context includes applicants, undergraduate, postgraduate students and apprentices enrolled on university-led apprenticeship programmes.

Student and Academic Services offer students free and confidential guidance, information, advice, and support services.

We also lead on investigations and administrative tasks related to policy and procedures.

- 1. Student and Academic Services consists of a number of specialist services including: Student Wellbeing Service (Counselling, Psychological Wellbeing, Mental Health Advice, Disability and Dyslexia, Greenwich Cares, STAART, Report + Support and our Sexual Violence Liaison Officers); Academic Registry; Student Accommodation Services; Student Fees, Funding and Advice Services and International Student Advice. We believe that all students have the right to confidentiality to protect their interests and ensure a relationship of trust between students and staff.
- 2. Our student-facing services are committed to treating you with dignity and respect. This includes handling any information you provide to us sensitively.
- 3. To ensure effective and coordinated support for students, relevant information may be shared among colleagues within the same service area. Additionally, information may be exchanged between teams within Student and Academic Services where necessary to facilitate the setup and delivery of appropriate support measures.
  - a. For instance, the Digital Student Centre includes a "Working With" field that indicates when a student is actively engaged with a specific service. This feature enables service providers to be informed of existing support arrangements and coordinate their efforts accordingly. While the flag feature indicates that a student is actively engaged with a particular service, it does not disclose any of the personal or confidential information shared during that engagement.
  - Some information is shared during the application process. This is to ensure support will be in place throughout this process and when you join the University.



c. We may also supply relevant information to relevant people as part of a university process such as Support to Study. For apprentices, relevant information may also be shared with your employer or training provider where this supports your progression, wellbeing, or meets the contractual obligations of your apprenticeship. We will normally seek your consent before doing so, unless a safeguarding or legal exception applies.

# 2. Sharing information

Under certain circumstances, we may need to share the information you have provided beyond Student and Academic Services. In rare and exceptional cases, this may also include sharing with external agencies, if necessary.

- d. In these circumstances we would look to obtain your consent first where possible and it will be explained to you in full why we believe there is a need to share this information, and who will have access to this information.
- e. If you do not provide us with consent to share this information or it is not practicable for us to try and obtain it, in certain circumstances we reserve the right to break confidentiality, for example (this list is non-exhaustive):
  - If a student is considered to pose a risk of physical harm to themselves or others:
  - If a student imparts information relating to criminal activity or planned criminal activity;
  - Where sharing is required by law;
  - Under the Prevention of Terrorism Act;
  - If the student poses a risk to the University;
  - Where the student is under 18 and there is a child protection concern;
  - Where we have a reasonable belief that a student is in breach of their immigration conditions and we are obligated to share that information with the university Visa Compliance Team;
  - Where the university may be required to share information with UK Visas & Immigration in accordance with its duties as a licensed Student Sponsor;
  - Where a disability or support need has been identified through observation or by being informed by the student themselves;
  - If we are asked by the Police, Local Authority Designated Officer (LADO) or similar using our third-party request form which meets certain criteria.



#### 3. Trusted contacts

We will also consider if we need to contact your trusted contact that you provided us with at registration, to accommodation services or to any of the services you have engaged with at the University. Information on when we may contact your trusted contact is available <a href="here">here</a>. So, it is important that you keep this information up to date. Apprentices are also encouraged to ensure their trusted contact information is accurate, especially if their home and work environments differ. Support can be coordinated through both university and employer settings where appropriate.

# 4. Multi Team Meeting

Where there are significant concerns around a student's wellbeing, we may escalate to a multi-team meeting. Multi-team meetings are intended to:

- manage complex and high or urgent-risk student cases
- enable shared decision-making
- agree actions for services to manage risk at a senior level

The meeting is chaired by the Executive Director of Student and Academic Services (or their nominee) and usually includes:

- The Executive Student and Academic Services (Student Services)
- The Head of Student Wellbeing Service
- The Head of Information, Advice and Participation Services
- Staff from the Student Wellbeing Service
- Staff from the Report and Support Team

We may also consult with other service areas and faculties at the University and external agencies as appropriate.

Where we have concerns regarding a student, we may flag their record in our Digital Student Centre system so that we can provide guidance on how best to support students in resolving a standard enquiry or additional casework to colleagues.

## 5. Confidentiality and Record Keeping

Each member of staff in the services listed, who has contact with students, may keep records of appointments or conversations with students in accordance with their professional judgement or external body requirements such as the British Association of Counselling & Psychotherapy, the Nursing and Midwifery Council, Department of Education, Student Finance England, the Office of the Immigration Services Commissioner.



Students registered with any of the services will have their contact details and records of attendance recorded; the data currently kept includes name, date of birth, address, telephone number and other relevant information as determined by each individual service.

Access to records is strictly limited to approved users who have received suitable training, and all information is kept confidential.

# Records held may include:

- Any completed forms and/or documentation provided by the student;
- Notes made by staff either before, during, or after an appointment;
- Ongoing correspondence relating to the case, including from third parties;
- Other relevant information that needs to be added to the student record.

# a. Exceptions

The Counselling Team, within the Student Wellbeing Service, keep session notes in a 'Sensitive Notes' section of the database, only accessible to those working within the Counselling team. However, the Counselling team share this database with other teams within the Student Wellbeing Service, namely, Disability and Dyslexia, Mental Health and the Psychological Wellbeing where assessment notes, correspondence and risk is recorded. This ensures confidentiality for students around what is discussed in sessions, whilst allowing a collaborative and safe approach in supporting them within the wider Student Wellbeing Service.

This multi-disciplinary approach follows guidance from British Association of Counselling & Psychotherapy and students can choose to request that their assessment notes and correspondence are not recorded on the shared database by putting this in writing to <a href="mailto:counselling@gre.ac.uk">counselling@gre.ac.uk</a>. However, in line with good practice and the limits of confidentiality within counselling, notes around risk and safeguarding will always remain accessible to those working within the Student Wellbeing Service.

All files kept by the Counselling team are not accessible to other members of Student and Academic Services, or any other department or individual, and information will not be shared, except in exceptional circumstances as described above.

#### b. Disabled students

Everyone in the University has a responsibility under the Equality Act 2010 towards disabled students to ensure that suitable reasonable adjustments can be made. Reasonable adjustments ensure that students have equity in their access to education and the services at the university.

Students have the opportunity to share their disability at various points throughout the admissions process and whilst on course. A referral needs to be made to Student



Wellbeing Service via the Digital Student Centre or via email to <a href="wellbeing@gre.ac.uk">wellbeing@gre.ac.uk</a> to discuss and arrange support

As part of our Duty of Care, we may not always seek consent from students for a referral on to necessary support service such as the Student Wellbeing Service once a member of staff academic or support services has been made aware of a disability or support need through observation or by being informed by the student themself. Where consent is sought and denied by the student, then a non-disclosure form should be completed. The Student Wellbeing Service can be contacted for support in these instances.

University staff are expected to start supporting students whilst they wait for the student to be contacted and seen by Student Wellbeing Service and an individualised support package is arranged. Please click to view a list of reasonable adjustments on offer at the University.

# c. Statistical Reporting

All information used for statistical reporting is anonymised.

# d. Additional Information for Apprentices

If you are an apprentice, the University and your employer have entered into a contractual agreement that governs your apprenticeship, including provisions for sharing relevant information to support your progress and meet funding requirements.

To ensure coordinated support, relevant information may be shared between the University, your employer, your university-based Skills Coach, and your Employer Mentor. This may include updates on your academic progress, engagement, wellbeing, or support needs. We will usually seek your consent before sharing personal information beyond the University, unless there is a legal, safeguarding, or serious risk concern.

We are committed to ensuring that all students, including apprentices, have access to support. We understand that apprentices may face unique challenges—such as balancing study with work—and our services are here to support you holistically. If you have any questions about how your information is used, please speak to your Skills Coach or contact the University's Data Protection Officer.

## Your rights

You have rights as a Data Subject. You can see more information about those rights on our website.

All students are entitled to access personal data relating to themselves, subject to certain conditions, and should make a request to the University's Data Protection Officer. Click for further information on the Data Protection Policy. Click for further information on the



<u>Freedom of Information Act</u>. In line with GDPR guidelines, retention of records is for the current academic year plus a further 6 years.

To contact the University of Greenwich Data Protection Officer and University Secretary, please email: <a href="mailto:compliance@gre.ac.uk">compliance@gre.ac.uk</a>

# **Related documents:**

- SWS Data Sharing and Consent
- Safeguarding Policy
- Data Protection Policy
- Information compliance policies

Student & Academic Services April 2009. Last updated July 2025

If you have any questions on this policy please email wellbeing@gre.ac.uk