

Reuben College - Guidance on Confidentiality in Student Health and Welfare

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1. INTRODUCTION	2
2. DEFINITIONS.....	2
3. GENERAL AND LEGAL CONTEXT	2
4. COLLEGIATE UNIVERSITY CONTEXT.....	3
5. GENERAL PRINCIPLES – BALANCING CONFIDENTIALITY WITH NEED TO ACT IN CASES OF RISK OF SERIOUS HARM.....	4
6. SEEKING ADVICE	5
7. PROMISES OF CONFIDENTIALITY	5
8. DISCUSSION WITH COLLEGE DOCTORS, COLLEGE NURSES AND THE STUDENT COUNSELLING SERVICE	5
9. CONTACT WITH FAMILIES.....	6
10. STUDENTS ON PROFESSIONAL COURSES	6
11. PROFESSIONAL GUIDELINES.....	7
12. SPECIFIC ISSUES	8
13. FURTHER DETAIL ON LEGAL BACKGROUND TO THIS GUIDANCE	11

1. Introduction

- 1.1. This document is intended for all those involved in student health and welfare for whom confidentiality might be an issue. It is designed to promote greater consistency in the way individual cases are handled, with paramount emphasis on student health and welfare. This Reuben College guidance closely follows the University guidance in this area, with minor variations to recognize the College context.
- 1.2. Colleagues are advised to familiarise themselves with this guidance as part of induction or ongoing training in welfare matters, so that in an urgent situation staff are well-informed and not making decisions in isolation. The College's Welfare Dean (welfare.dean@reuben.ox.ac.uk) can advise colleagues on a no-names basis, as can the University's Director of Student Welfare and Support Services, as appropriate.
- 1.3. This guidance applies to all students including those abroad or on research trips. Students overseas may not be able to access the full range of welfare services referenced in this guidance, but the general principles still apply.
- 1.4. During the College's first year of admitting students some services will be provided by or through a Partner College. Sharing of student data forms a necessary part of that arrangement, and, for all practical purposes, the same principles and guidance applicable to sharing of data within the College, or between the College and the University, provided for within this guidance, shall apply to sharing of data by the College with any Partner College or vice versa.

2. Definitions

- 2.1. "Health" in this document means both physical and/or mental health
- 2.2. "Risk" means a risk that a person involved in student health and welfare reasonably considers is possible may occur given the facts within their knowledge. They need not conclude an outcome is more likely than not, only that they reasonably believe an outcome is possible.
- 2.3. "Serious Harm" means that a student is either at Risk of (a) death or serious injury; and/or (b) attempting suicide; and/or (c) self-harm; and/or (d) endangering the life, health, or safety of any other person.
- 2.4. "Lacks Capacity" means either a permanent or temporary condition which leads to the student being incapable of making decisions which protect their health, safety or welfare. This includes both situations where a student has lost capacity as a result of a medium to long term mental or physical condition and/or situations where a student is temporarily incapacitated for a short period as a result of drink, drugs, misadventure, accident or a short term medical condition.

3. General and legal Context

- 3.1. In general, information relating to the health and welfare of an individual will amount to special category data (as defined in the UK General Data Protection Regulation (UK GDPR), and also known as 'sensitive personal data') and must be kept confidential and only disclosed with consent. This guidance sets out the basis for dealing with exceptions to that general rule.

- 3.2. This guidance aims to balance the potentially competing principles involved in (a) compliance with Data Protection legislation, particularly in relation to special category data; (b) other legal obligations to maintain confidentiality where information is provided in contexts where express or implied duties of confidentiality arise; and (c) the duties of the College and wider University to look after the vital interests of students (which arise under contract, tort, statutory duty and common law).
- 3.3. Cases where a student is reasonably considered to be at Risk of causing Serious Harm and yet failing to adequately engage with help available (e.g. for serious mental health problems) while withholding consent to share special category data relating to their health with persons or services best placed to help them are especially difficult but not unusual. This guidance is drafted with those cases in mind.
- 3.4. In certain circumstances the College, and the University, may owe obligations to individuals that cannot be discharged unless they take action on information provided in confidence e.g. to protect the vital interests of others. Such circumstances involve weighing up different interests.
- 3.5. Further detail on the relevant provisions of the Student Privacy Notice and the wider context of Data Protection legislation and Information Commissioner's Office (ICO) guidance, which underpin this guidance, is at paragraph 13 below.

4. Collegiate University context

- 4.1. This guidance covers both sharing of special category data within the College, or with any Partner College, and situations where such data needs to be shared between the College and departments of the University.
- 4.2. A significant amount of sharing of personal data relating to students is already permitted and envisaged between the College, any Partner College and University departments under both:
 - 4.2.1. the Terms and Conditions of the student's contract with the College at <https://www.reuben.ox.ac.uk/students#/> and the Terms and Conditions of the student's contact with the University (at <https://www.ox.ac.uk/students/new/contract>) and
 - 4.2.2. the College Student Privacy Notice at <https://reuben.ox.ac.uk/governance-and-policies> and the University student Privacy Notice at <https://compliance.admin.ox.ac.uk/student-privacy-policy> (each of which is incorporated as part of the student contracts referred to above). These privacy notices were updated in 2020/21 to clarify limited circumstances in which special category data related to health might be shared even if students have not consented to it (i.e. where there is a Risk of Serious Harm), providing the safeguards within the privacy notices and this guidance are followed.
- 4.3. Problem cases have arisen where different parts of the Collegiate University each have part of the picture relating to a student's health and welfare which, if combined, would constitute a Risk of Serious Harm which necessitates immediate action to protect the student or others. This guidance, and the Student Privacy Notices (for the College and for the University), were updated to address that issue.

5. General Principles – balancing confidentiality with need to act in cases of Risk of Serious Harm

- 5.1. Exceptions to the general rule at paragraph 3.1 arise particularly in cases where there is a Risk of Serious Harm or where the student lacks capacity to give consent and needs intervention from medical professionals.
- 5.2. Whilst sharing information might seem the most helpful response, students are adults and the confidentiality of their data must be maintained, and information not shared without consent save where paragraph 5.1 applies
- 5.3. Those advising students should consider at the outset of a discussion whether it would be helpful to make clear that the content is to be confidential and the extent of the confidentiality which can be afforded to any disclosures.
- 5.4. When discussing confidentiality with students the following should be made clear:
 - 5.4.1. Confidentiality will be respected wherever possible;
 - 5.4.2. Consent will be sought, wherever possible, to any onwards disclosure of information; and
 - 5.4.3. There are limited circumstances in which information might have to be shared with a third party, e.g where there is a risk of Serious Harm or where an individual lacks capacity to consent and needs intervention from medical professionals
- 5.5. Those involved in advising students should, where possible, seek the consent of the individual for the onward disclosure of relevant information to those with a clear need to know, and for this consent to be recorded in writing.
- 5.6. Where such consent is not forthcoming, the person entrusted with the information should make it clear that in exceptional circumstances, particularly where there is a Risk of Serious Harm, it may be necessary to disclose the information to others. Guidance can be sought from the College's Welfare Dean (welfare.dean@reuben.ox.ac.uk), or the University's Director of Student Welfare and Support Services, as appropriate.
- 5.7. Where disclosure of personal data, or special category data related to health, is deemed necessary because there is a Risk of Serious Harm it is important to ensure that the disclosure is:
 - 5.7.1. Limited to only those recipients who need to know the information in order to be able to provide medical, pastoral or practical assistance to the student or to others at Risk that is reasonably likely to mitigate the Risk of Serious Harm or its effects;
 - 5.7.2. Adequate to enable reasonable steps to mitigate Risk to be taken;
 - 5.7.3. Limited to that information which is proportionate and necessary to mitigate the Risk of Serious Harm, while maintaining confidentiality of personal data which is not necessary for that purpose;
 - 5.7.4. Shared in a way which informs recipient(s) of the confidential nature of the information and ensures, as far as possible, they respect its confidentiality;
 - 5.7.5. Recorded in writing contemporaneously, noting reasons a student or others were deemed at Risk of Serious Harm and why disclosure of special category data was necessary. If a decision to disclose sensitive personal data is challenged (to the ICO, OIA or a Court) this

may be important to show how the College or University weighed conflicting duties regarding confidentiality/Data Protection and safeguarding/vital interests.

6. Seeking advice

- 6.1. Those to whom information has been given in confidence, or who have acquired information which they regard as confidential, may not always be sure whether to disclose information or not. It may be sensible to seek advice from an appropriate person e.g. the college Welfare Dean, other senior college officer, the college doctor or the University's Student Counselling Service. This consultation should be done without divulging the name of the student concerned save where there is a Risk of Serious Harm.
- 6.2. Student Peer Supporters operating under the University's Peer Support Programme have a separate policy on confidentiality.

7. Promises of confidentiality

- 7.1. It is generally not appropriate to give absolute assurances of confidentiality to those who may wish to talk about health-related matters. See paragraph 5.4 of this guidance for an outline of the appropriate approach to be taken when discussing how health related information will be dealt with.

8. Discussion with college doctors, college nurses and the Student Counselling Service

- 8.1. It is often helpful for tutors or others to talk to college doctors, college nurses or members of the University's Student Counselling Service about undergraduate or graduate students' difficulties; the individual's consent to do so should be sought.
- 8.2. If consent is not forthcoming, it may still be helpful to seek general advice from the doctor, nurse or counsellor without identifying the student concerned. However, in cases where there is a Risk of Serious Harm identification may become necessary (provided the guidance at paragraph 5.7 is followed).
- 8.3. In exceptional circumstances college doctors, college nurses and counsellors may wish to speak to the senior members of a college about a student. If the student is unwilling, confidentiality will be respected unless there are reasons not to within the relevant professional guidelines or where they reasonably believe there is a Risk of Serious Harm.
- 8.4. The Student Counselling Service's Liaison Scheme, whereby colleges may elect to have a named counsellor with whom they can liaise, is specifically designed so that college members can seek the advice of someone who is familiar with the college context.
- 8.5. Mature or part-time students may not be registered with the college GP or have easy access to the college nurse or counselling service. Some colleges have found it helpful to record the name of the student's GP surgery where this is not the college GP.
- 8.6. Where students arrive at University with serious medical conditions (particularly, but not limited to, conditions which affect their mental health e.g. those with histories of self-harm or suicide attempts) or are diagnosed with such conditions while at University, the issue of consent to sharing of information should ideally be discussed with the student at an early stage whenever support (e.g. within the College or through the Disability Advice Service) is arranged. Every case will turn on its own facts and the level of discussion may depend on whether the student's condition at any point is believed to increase the Risk of Serious Harm.

9. Contact with families

- 9.1. In almost all cases it is inappropriate to speak to a student's family against the student's wishes. In such circumstances, contact can only be justified where either:
- 9.1.1. the student is physically incapacitated (e.g. unconscious due to serious accident); or
 - 9.1.2. the student has been medically assessed as lacking capacity to make the decision; or
 - 9.1.3. where the student is at Risk of Serious Harm, other attempts to mitigate that Risk (e.g. through medical professionals) have failed or are impractical, and the person making the report reasonably considers disclosure to family members is necessary as only the family are in a position to ensure the student obtains support to mitigate Risk of Serious Harm. Such circumstances will be exceptional but can happen in cases of self-harm or where suicide has been attempted or threatened. They may also arise where a student is creating Risk of Serious Harm to others. In such cases the College and University cannot delegate responsibility to a student's family but should also consider what steps they may also need to take to mitigate a Risk of Serious Harm. Some students may give non-family members as next of kin depending on their circumstances.
- 9.2. Any decision to contact the family should be made at the highest level (e.g. head of college), taking specialist legal advice as necessary, and the student should normally be informed. The reasons for the decision should be briefly recorded, contemporaneously.
- 9.3. If a student has formally informed the College that they are estranged from their family then contacting that family will (save in the most exceptional cases) be inappropriate.
- 9.4. Where family members or partners of students contact the College the confidentiality of students' special category data should be maintained save where paragraph 5.1 applies. College staff may need to inform parents or partners of student's rights to confidentiality. Where family members raise concerns for a student's welfare it may be appropriate to inform them of channels of support available to all students (eg college doctor, welfare support in college, counselling). Staff may need to advise family members that information provided in relation to the student will not normally be acted upon, and that they should encourage the student to disclose this information themselves and seek help. However, in cases where a family member or partner discloses that a student may be at Risk of Serious Harm the College must act on this information, and may need to communicate that it will not be possible to guarantee anonymity to the disclosing party.
- 9.5. Some students give written consent for information to be shared with others (e.g. where parents or partners of students with disabilities are actively involved in their support).

10. Students on professional courses

- 10.1 Special considerations apply to students on courses leading to qualifications for professions governed by codes of conduct and health intended to protect the public for example, medicine, social work and teaching. Any concerns about the health or behaviour of a student on one of these courses may be discussed with the department concerned, in the first instance without divulging the name of the student. Advice may also be sought from the college doctor or the Head of the Student Counselling Service.

- 10.2. The General Medical Council (GMC) expects medical students to be open and honest about any conditions which might affect their ability to study or practice and to engage readily in any assessment or monitoring. Non-disclosure is likely to be viewed adversely when problems do become apparent. The Associate Director of Pre-clinical Studies [Health & Welfare] within the Medical Sciences Division (MSD) is available to support medical students with welfare issues and provide advice. Concerns about fitness to practice should be addressed to the Assistant Registrar in MSD.
- 10.3. The College, the University, and individual members of staff may owe duties of disclosure in cases where students on courses governed by professional codes of conduct under paragraph 5.15 are under investigation (e.g. obligations of disclosure and provision of relevant documentation to the Medical Sciences Division during an investigation into a medical student under the Fitness to Practise Regulations). Where sensitive personal data of the student is directly relevant to the Fitness to Practise (or other professional) investigation the obligation of disclosure will override the student's right to confidentiality. Any agreement between a College, or any part of the University, and a student to keep sensitive personal data confidential will be invalid if that data is relevant to a medical student's fitness to practice. In such cases that data will remain confidential to MSD's appointed investigator and any Fitness to Practise panel (though that panel may decide to disclose it to the GMC, along with the panel's findings, if relevant). Guidance can be sought from the University Legal Services Office in these cases.

11. Professional guidelines

Doctors and their professional colleagues

- 11.1. Guidelines on medical confidentiality are codified by the General Medical Council. Doctors have the discretion to share information with other members of the healthcare team, for example, college nurses. There are limited exceptions to confidentiality – statutory and in the public interest. The General Medical Council states:

"Disclosures may be necessary in the public interest where a failure to disclose information may expose the patient, or others, to risk of death or serious harm. In such circumstances you should disclose information promptly to an appropriate person or authority."

- 11.2. NHS staff are bound by the Department of Health guidance, Confidentiality: NHS Code of Practice, and college nurses by the Nurses and Midwife Council code which states:

"[Nurses] must... share necessary information with other healthcare professionals and agencies only when the interests of patient safety and public protection override the need for confidentiality."

University Student Welfare and Support Services

- 11.3. The Student Counselling Service is an organisational member of the British Association for Counselling and Psychotherapy and abides by its Ethical Framework for Good Practice. Confidentiality remains with the staff of Student Welfare and Support Services (SWSS) and information will only be conveyed to others without permission in exceptional cases where SWSS

reasonably believe there is a Risk of Serious Harm and it is necessary to take steps to mitigate that risk.

- 11.4. The Disability Advisory Service will share confidential information related to declared disability for the purposes of supporting that student with the written consent of the student.

Faith leaders

- 11.5. College and denominational chaplains, as ministers of religion, operate within strict ethical codes as regards information disclosed to them in confidence. Often chaplains and other faith leaders have a significant welfare role and therefore like counsellors and doctors, they may very occasionally be required to divulge information given in confidence, including where there is a Risk of Serious Harm. When functioning as a member of the College welfare team Chaplains will abide by their college's rules on confidentiality. Occasionally Chaplains may need to tell students the understanding of confidentiality within which they work.

12. Specific issues

Major behavioural and emotional problems

If a student's behaviour is such that they are considered to pose a risk to staff or students within the Collegiate University, the senior member responsible for college welfare should consider whether the vital interests of others are affected. Where there is time to consider action, it is important to seek the confidential advice and help of the college doctor (when matters of safety are of concern). In rare cases where there is a Risk of Serious Harm it will be necessary not only to warn the college GP/nurse but to warn others to safeguard their health and welfare (e.g. students or staff who are at risk of harm from a student's dangerous behaviour, University security staff, College Porters.) In such cases the recipients and the information shared, should be limited to that necessary to mitigate the Risk of Serious Harm, in line with paragraph 5.7 above.

- 12.1. If a student's behaviour is such that they are at Risk of Serious Harm to themselves (e.g. through self-harm or suicidal threats or attempts) they should be encouraged to engage with their GP in the first instance, but where such a student is failing to take steps to mitigate the Risk of Serious Harm (including not engaging with health professionals) it is likely to be necessary to communicate special category data to those members of staff who are in a position to provide medical, pastoral or pastoral assistance to mitigate that Risk. In some cases it may be necessary to contact the emergency services. Where time permits it is important to seek the confidential advice and help of the college doctor.
- 12.2. If a student is causing concern or disruption but is not considered to pose a risk to other members of the college or department or themselves, and they are unwilling to consult medical professionals, a senior member with pastoral experience may well be able to achieve a satisfactory solution, and case conferences can be useful tool. A senior member may wish to contact the Director of Student Welfare and Support Services or Head of Counselling to discuss possible sources of help.

Discipline and ill health

- 12.3. The University and colleges have formal procedures for dealing with serious problems arising from ill health which come to light during a disciplinary investigation or otherwise. University departments and/or colleges must ensure that any decision to share sensitive personal data is in accordance with Data Protection legislation. Please refer to the University [Fitness to Study procedure](#) (or College procedures) for more information.

Discharge from hospital

- 12.4. Hospitals in the UK are supposed to contact GPs about students discharged from the emergency department or inpatient wards with significant medical problems. In practice there are occasions where such information does not get through for various reasons, or in a timely fashion. It is the responsibility of hospital staff to ensure a 'safe' discharge and this may include communication with the College or family to which the patient will be discharged, but this is subject to the patient giving permission to share information. In cases of serious mental illness and/or following incidents of self-harm or suicide attempts, in practice, students often withhold permission out of a sense of shame or wishing to hide their condition, thus increasing their Risk of Serious Harm in future.
- 12.5. If the GP is a College doctor, they should be fully aware of the consequences for colleges, and they or a nurse are likely to ask the patient to provide permission to inform relevant officers within College. Students who are not registered with a College doctor are at particular risk of sub-optimal communication between their GP and the College welfare team, and/or at risk of incorrect assumptions of what support may be available. College nurses play an important role in ameliorating such problems. It is helpful if those responsible for student welfare have discussed issues and procedures with their college doctor and nurse.

Risk of self-harm

- 12.6. If it appears that a student is at risk of self-harm then concerns should be reported to a senior member of the College with pastoral responsibilities. It is often sensible to discuss these concerns directly with the student. The College doctor or Student Counselling Service can be consulted. Even when the doctor or counsellor is unable to comment about a particular case for reasons of confidentiality, it can be useful to discuss general issues. Since self-harming activity can vary in its level of immediate danger, discussion with a professional is important to assess what action is needed. In urgent circumstances where a student is at Risk of Serious Harm a doctor should be consulted and, if necessary, emergency services contacted.
- 12.7. If a student attends the John Radcliffe Hospital following self-harm, or for any other mental health issue, they should be offered an assessment by the Emergency Department Psychiatric Service, or the Psychological Medicine Service if admitted to a medical or surgical ward. This assessment will be shared with the student's GP. Students will be asked whether they consent to information being shared with any other specific individuals in the College (such as Welfare Dean) and with the University Counselling Service if appropriate. However, there have been instances of (a) students leaving A&E immediately after receiving treatment for their physical wounds but before being assessed by a psychiatrist and (b) refusing consent to sharing of medical information with the other parties above.

Disclosures to the police

- 12.8. The police may occasionally contact the University or College to request that information be disclosed to them as part of an investigation. In such circumstances, the following considerations should be taken into account:

- 12.8.1. Is it possible to obtain the consent of the relevant individual to the disclosure to the police?
- 12.8.2. Whether disclosure is requested under the Data Protection Act for the prevention or detection of crime or apprehension or prosecution of offenders and seeking an individual's consent will prejudice the inquiry. Please note, however, that this provision does not compel disclosure and decisions about whether or not to disclose information should be considered carefully. Factors such as the seriousness of the offence will be relevant. If it is decided that a degree of disclosure is appropriate this should be limited to the minimum required. Any such requests made to the College should be referred to the College Data Protection Officer. (The College can also seek guidance from the University's Information Compliance Team on data.protection@admin.ox.ac.uk.)
- 12.8.3. Whether the College will require the police to obtain a court order for disclosure
- 12.8.4. If College staff are unsure what to do in these circumstances, they should contact the University's Legal Services Office or University Information Compliance team for advice.

Serious crime

- 12.9. Victims of serious crime can seek advice from the College officers, University Safety Office, in person or remotely if out of residence, or approach the Police directly. Survivors of rape or sexual violence can speak to trained first responders or find further information online at <https://edu.admin.ox.ac.uk/harassment-advice#/>. Advice on how to support students in such circumstances and on the details of confidential referral routes can also be found on this site.
- 12.10. All information concerning sexual assault and sexual violence should be treated in confidence, and information should only be shared with consent of the individual and on a need-to-know basis. Sharing of information with consent will be limited to staff in order for support to be put in place, and the purpose of sharing should be explained to the individual. This support may include making arrangements to limit contact between the parties concerned. In such cases advice can be sought from the College Deans, or Director of Student Welfare and Support Service. Staff may be obliged to provide evidence to the Court in proceedings arising from an allegation of sexual assault or sexual violence.
- 12.11. If a member of College staff is, or believes they may be, the first person to whom the victim of any such assault has disclosed this information then a contemporaneous, dated, file note of the details of the conversation should be recorded as soon as possible after the disclosure, and stored confidentially, in case it is needed later to assist the victim in bringing any Police complaint.
- 12.12. There may be circumstances in which confidentiality cannot be maintained, e.g. where there is a concern of serious harm to the individual (e.g. failure to seek suitable medical support) or others. In such cases the University and College's duty of care must be considered. Decisions on sharing information without consent must be made at a senior level (e.g. Head of House), seeking specialist legal advice as appropriate.

Dealing with the media

- 13.13 It is important that all members of staff of the University should be careful about speaking to the media and this is particularly so when there is a risk that confidential or sensitive personal data might be inadvertently disclosed. Colleges and the University have policies about who should respond to enquiries and the University Press Office is always able to give advice. In

cases of student death the Student Tragedy guidance (available from the Welfare Dean or Senior Tutor) should be followed.

Under 18s

- 13.14 Separate considerations apply to students under the age of 18. Further advice should be sought from Safeguarding Leads where appropriate and more information is available on the [University's Safeguarding webpages](#).

13. Further detail on legal background to this guidance

- 13.1. In order to lawfully process special category data (which includes health data) it is necessary to identify both a lawful basis under Article 6 of the UK GDPR and a separate condition for processing under Article 9 of the GDPR.
- 13.2. Where a student is at Risk of Serious Harm (as defined in paragraph 2 above), and providing this guidance is adhered to, then:
- 13.2.1. the two lawful bases upon which the Collegiate University relies under Article 6 of the UK GDPR are vital interests and public task
- 13.2.2. the Article 9 conditions for processing special category data on which the College and University relies are (a) vital interests under Article 9 of the UK GDPR and/or (b) reasons of substantial public interest under Article 9(2)(g) of the UK GDPR, relying on the substantial public interest condition at paragraph 18 of Part 2 of the Schedule 1 of the Data Protection Act 2018 (i.e. safeguarding of children and individuals at risk).
- 13.3. This guidance has been prepared with reference to the ICO's Data Sharing Code of Practice and is part of planning ahead for data sharing in urgent or emergency situations as recommended in the chapter of that Code 'Data sharing in an urgent situation or in an emergency'. Among other things, that Chapter of the Code confirms:
- 13.3.1. *In an emergency, you should go ahead and share data as is necessary and proportionate. Not every urgent situation is an emergency. An emergency includes:*
- *preventing serious physical harm to a person;*
 - *preventing loss of human life;*
 - *protection of public health;*
 - *safeguarding vulnerable adults or children;*
 - *responding to an emergency; or*
 - *an immediate need to protect national security*
- 13.3.2. *The key point is that the DPA 2018 does not prevent you from sharing personal data where it is appropriate to do so. It is particularly relevant to factor into your considerations, training and procedures for this type of situation the risks involved in not sharing data.*
- 13.4. Guidance on data minimization at paragraph 5.7 was prepared with reference to Article 5 (1) (c) of the UK GDPR.
- 13.5. The Student Privacy Notices (for the College and for the University) are part of all students' contracts with the College and the University. These Student Privacy Notices permit sharing of special category data in the types of circumstances covered within this guidance.

13.6. Section F of the University Student Privacy Notice includes the following circumstances in which the University may process student data:

13.6.1. *“Where it is necessary in order to protect your vital interests or the vital interests of another person - There may be circumstances in which it is necessary for us to process your data to protect an interest which is essential for your life or that of another person or where the processing serves important grounds of public interest and your vital interests for example, humanitarian purposes which may include monitoring epidemics and their spread or in situations of humanitarian emergencies where there is a risk of serious harm or death to yourself or others.”*

13.7. Section G of the University Student Privacy Notice includes the following:

13.7.1. *Special category data and criminal conviction data require a higher level of protection. Listed below are examples of processing activities that we regularly undertake in respect of these types of data. In addition to the activities listed below, it may sometimes be necessary to process this sort of information for exceptional reasons, for example, because it is necessary to protect your vital interests (including in relation to health and safety) or those of another person or for safeguarding purposes.*

13.7.2. *We will process data about your health where it is necessary to make reasonable adjustments for disability and/or to monitor equal opportunities. Processing of this nature is necessary to meet contractual or other legal obligations. We may also process data about your health in accordance with the terms of our contract with you, to protect our legitimate interests and/or to comply with legal obligations where it is relevant to a particular University procedure, including the disciplinary, complaints appeals, fitness to study, fitness to practise or fitness to teach procedures or in relation to an application you have made for a suspension, extension or dispensation, or where the outcome of such a procedure is referred to a regulatory body, such as the OIA or the General Medical Council (where such referral may also be for the purpose of fulfilling a task in the public interest). There may be situations where we ask for your explicit consent to share information about your health. There may also be limited circumstances where your health and safety, or that of others, is at serious risk where your health data may need to be shared whether or not you have given consent (subject to data minimisation, limiting recipients of such data to those people or agencies able to assist (e.g. NHS or emergency services staff) or pseudonymisation of your data where possible). Examples of these limited circumstances include: (a) Where you are at risk of causing serious harm to yourself or others (e.g. threats or attempts at suicide or violence to yourself or others) and (b) as a result of testing positive for Covid-19 (or any other serious infectious illness) where track and trace or other urgent health and safety measures must be taken.*