



ST. HUGH'S COLLEGE, OXFORD

CONFIDENTIALITY IN STUDENT HEALTH & WELLBEING

Date Policy Ratified by Governing Body: 17 June 2026

Committee Responsible: People Subcommittee

Date to be reviewed by: 17 June 2028

Confidentiality in Student Health & Wellbeing

1. Purpose and Framework

St Hugh's College is committed to respecting students' privacy and handling personal data lawfully, fairly and transparently. The College fulfils its statutory obligations in relation to data protection, confidentiality and safeguarding.

Information relating to a student's health and wellbeing constitutes special category personal data and will be treated with appropriate care, discretion, and security. The obligations set out in this Appendix apply to all College employees and others acting on behalf of the College.

The purpose of this Appendix is to:

- support students in seeking help safely and confidently;
- enable appropriate coordination of welfare support within College;
- protect privacy and confidentiality;
- ensure compliance with legal and safeguarding obligations; and
- provide clarity regarding circumstances in which information may be shared.

This Appendix should be read alongside:

- [Oxford University Guidance on Confidentiality in Student Health and Welfare](#);
- [St Hugh's College Data Protection Policy Statement](#);
- [St Hugh's Privacy Notice](#);
- [St Hugh's Information Classification and Handling Policy and Guidelines](#).

2. Disclosure in High-Risk Situations

Certain circumstances may arise – particularly where there is a risk of serious harm to the student or to others – in which confidential information may need to be shared.

Where it is reasonably practicable to do so, the College will seek the student's consent before sharing confidential information.

Where consent cannot be obtained, or is withheld, information may nevertheless be disclosed on a strict "need-to-know" basis where this is considered necessary to:

- protect the student or others from serious harm;
- fulfil safeguarding obligations;
- comply with legal or regulatory duties; or
- discharge the College's core academic or welfare responsibilities.

Any such disclosure will be proportionate, limited to the minimum necessary information, and normally authorised by the Principal or a senior College Officer acting on her behalf. The decision and reasons for it will be recorded.

3. The Health and Wellbeing Team

The College Health and Wellbeing Team comprises the Welfare Deans, College Nurse, and Chaplain. Its work is overseen by the Dean.

The Team uses a shared student welfare database to coordinate pastoral support and to help ensure continuity and consistency of care. Information entered into the database for general welfare and

pastoral purposes may be shared between members of the Health and Wellbeing Team where this is necessary to provide appropriate support to the student.

Such sharing operates on the basis of implied consent for coordinated pastoral care and will always be proportionate and limited to what is necessary.

Students may ask how their information is being used and shared and may raise concerns with the Dean, or the College Data Protection Lead.

4. Confidentiality relating to Medical and Spiritual Information

Certain information is subject to enhanced professional confidentiality, including:

- medical records created by the College Nurse; and
- records created by the Chaplain in their role as a spiritual advisor.

Such records are protected and will not be shared with other members of the Health and Wellbeing Team without the student's explicit consent, except where disclosure is required in accordance with Section 2 above.

Medical practitioners and the Chaplain will adhere to their respective professional codes of confidentiality.

5. Academic Support and Information Sharing

The Academic Office is responsible for implementing academic adjustments and support arrangements, including those arising from issues relating to a student's health and wellbeing. The team consists of the Academic Registrar, Student Support and Disability Co-ordinator, and Academic Support Officers. Their work is overseen by the Senior Tutor.

Information may be shared between the Health and Wellbeing Team and the Academic Office where this is necessary to facilitate appropriate academic support or reasonable adjustments.

Where reasonably practicable, the student's explicit consent will be sought before identifiable information is shared, except in the exceptional circumstances described in Section 2.

Where possible, information shared for academic purposes should be limited to functional impact and recommended adjustments rather than detailed information.

6. Trusted Contacts and Families

Students aged 18 and over are treated as independent adults. The College will not normally share health or welfare information with parents, family members, or other parties, including trusted contacts, without the student's consent.

Students are required to identify a trusted contact. This may not be anyone currently a student at the University of Oxford and should not be a student at another University.

In serious situations where a student is unable to provide informed consent, and where significant welfare or safety concerns exist, the College may contact a trusted contact where this is judged to be in the student's vital interests.

Any such decision will be proportionate and normally made by the Principal or a senior College Officer acting on her behalf. The decision and reasons for it will be recorded.

7. Professional Conduct and Information Handling

All College employees and others acting on behalf of the College must:

- respect privacy and confidentiality;
- handle information in accordance with the College data protection policies;
- exercise discretion in email and digital communications;
- avoid unnecessary or excessive disclosure.

Confidential information should only be accessed where there is a legitimate College purpose for doing so.

Where advice is sought from colleagues, this should normally be done in a manner that preserves anonymity unless identifiable disclosure is necessary, justified, and appropriately recorded.

Breaches of confidentiality or inappropriate handling of personal data may result in disciplinary action and, where appropriate, referral under relevant professional or regulatory procedures.