Policy: Policy on Student Wellbeing Centre Protocol

Purpose: The Nanyang Technological University (NTU) is committed to providing professional counselling, guidance and consultation for students with emotional and psychological issues and challenges within the private and confidential setting of the Student Wellbeing Centre (SWC).

Policy Statement: This policy outlines the procedures and guidelines governing the ethical conduct and practices of the staff of the Student Wellbeing Centre in the provision of professional counselling services to the students of NTU.

Applicability: Faculty, staff and students of NTU

Definitions:
1. **Student** refers to any person who is currently enrolled in a part-time or full-time programme of study at NTU.

2. **Counselling** refers to an interactive learning process of addressing students’ intimate concerns, issues or behaviours facilitated by a professionally-trained counsellor within a private and confidential setting.

3. The **Duty of Care** refers to the ethical framework and principles that govern professional counsellors’ conduct in the provision of reasonable standard of care to clients. The ethical framework and principles are spelt out by the Singapore Association for Counselling’s Code of Ethics (http://www.sac-counsel.org.sg/ethics.html).

4. The **University Code of Conduct on Confidentiality and Privacy** refers to the treatment of restricted information with due respect for its sensitivity, secrecy or confidentiality, and in compliance with all applicable laws and agreements and the University’s policies and principles pertaining to the use, protection and disclosure of such information.

5. **Limits to Confidentiality** refer to the exceptions that make it necessary for the Student Counsellor to disclose certain information. However, the scope of the disclosure is within the premise of Duty of Care and only allows disclosure of what is necessary.

6. The **Duty to Warn** is part of the ethical framework of Limits to Confidentiality which refer to the exceptions that make it necessary for the counsellor to disclose certain information. However, the scope of the disclosure is within the premise of Duty of Care, and only allows disclosure of what is necessary. Attention is drawn to Point 8 of Section B: Counselling Relationship from the Singapore Association for Counselling’s Code of Ethics (http://www.sac-counsel.org.sg/ethics.html).

7. **At-Risk Behaviour** refers to behaviour or action that poses an imminent risk to personal safety, property, members of the University community or the community at large.
8. **Case Discussion** refers to a private meeting among relevant members of the counselling team and/or University community to discuss an at-risk case within a confidential setting.

9. The **NTU Honour Code** refers to the academic, intellectual and ethical standards that govern the conduct of students and members of the University community.

10. The **Singapore Medical Association’s guidelines on Retention of Record** stipulates: “As a rule of thumb, most medical records can be safely destroyed when 10 years have elapsed since the patient was last treated, or since the patient’s death.”

   [Link to guidelines]

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**Policy Owner:** Associate Provost (Student Life)

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### Section A: Provision of Professional Counselling Services

1. The NTU Student Wellbeing Centre (SWC) provides professional counselling services at no charge to all students of NTU.

2. Student Counsellors may at their discretion extend counselling services to:
   a. Students on leave of absence (medical or personal)
   b. Members of a student’s family, a student’s friend or caregiver as part of the campus community approach to pastoral care

   The above-mentioned exceptions shall be subject to approval by the Section Head of SWC or the Director of Students, Student Affairs Office.

3. SWC’s counselling services are not available to:
   a. Alumni of NTU
   b. Employees of NTU
   c. Members of the public

4. Student Counsellors shall be guided by the Duty of Care and the University Code of Conduct on Confidentiality and Privacy when offering professional counselling to students.

5. Student Counsellors shall explain the Limits to Confidentiality to students receiving counselling at the first meeting. An agreement to these limits shall be obtained from the students before the counselling session proceeds.

6. Student Counsellors may exercise the Duty to Warn if they assess that there is a reasonable belief of at-risk behaviour.
7. SWC treats students as adult learners in a University environment who are responsible and accountable for their own thoughts, actions and behaviour; unless a student has a medical condition that may significantly impair their cognition or functioning. In such a circumstance, the student may benefit from specialised care and treatment.

8. SWC provides consultation to faculty and staff of NTU and members of the public who may have concerns over a student’s behaviour. The SWC’s Policy on Release of Information shall apply if it requires disclosure of information on a student who is currently receiving counselling.

9. SWC’s professional counselling services do not extend to:
   a. Participation in an inquiry, investigation or disciplinary hearing unless the SWC staff is served with a court subpoena
   b. Conducting assessment interview of a student’s psychological state of health on his/her application for: leave of absence, housing, withdrawal, termination or re-admission into an academic programme, or any matter that may result in conflict of the Student Counsellor’s professional role or boundary

10. SWC does not permit its services being used as a means to support a student’s application, appeal or cause for any matter, or to influence any course of outcome or action that may have legal or ethical concerns.

11. SWC does not permit its premises being used for non-counselling purpose (e.g. research, media interview).

12. Request for participation or assistance in a research or assignment shall be subject to approval by Section Head of SWC and Director of Students, Student Affairs Office. If approved, SWC’s Policy on Release of Information and other related policies shall apply.

13. Request for media interview with a staff of SWC shall be subject to approval by Section Head of SWC, Director of Students, Student Affairs Office and the Corporate Communications Office. If approved, SWC’s Policy on Release of Information and other related policies shall apply.

14. Student Counsellors may refer students to other professional resources if the student’s issue or condition is not within the expertise of its counselling team or scope of professional counselling.

15. Request for counselling services outside of the SWC premises shall require the approval of the Section Head of SWC or the Director of Students, Student Affairs Office, and be considered on a case-by-case basis. If approved, SWC’s Policy on Managing Safety Risks shall apply.

16. The location for professional counselling outside of SWC premises shall have provision for privacy and confidentiality.

17. SWC reserves the right to refuse its services to faculty, staff, students or visitors who are physically or verbally abusive toward the staff of SWC or pose safety risk to the staff of SWC. Under such a circumstance, SWC’s Policy on Managing Safety Risks shall apply.
Section B: Referral of Students to the Student Wellbeing Centre

18. The NTU Student Wellbeing Centre (SWC) provides professional counselling for students on a consensual basis.

19. NTU and SWC do not permit students receiving counselling without their consent or under coercion, with the following exceptions:
   a. That there is an assessment of threat to life or property (at-risk behaviour)
   b. That the student is found to have violated the NTU Honour Code, and mandated to receive counselling arising from a decision by a University’s inquiry panel (e.g. Board of Discipline, Lee Kong Chian Medicine Professional Conduct and Behaviour Assessment Panel)

20. SWC does not permit referral of students to receive counselling for the following purposes or circumstances:
   a. SWC being requested to contact a student without his/ her consent to invite him/ her for counselling
   b. To change a student’s thoughts or behaviour (that are not considered ‘at-risk’) against his/ her will
   c. To assess a student’s psychological state of health on his/ her application for: leave of absence, housing, withdrawal, termination or re-admission into an academic programme, or any matter that may result in conflict of the Student Counsellor’s professional role or boundary
   d. To support hospitalisation of a student who is not an at-risk case
   e. To support an application, appeal or cause for any matter, or to influence any outcome or course of action that may have legal or ethical implications
   f. To serve strictly as a form of discipline

21. SWC accepts self-referral through phone call, email or walk-in where students seek counselling without a referral from a faculty, staff, peer or a member of the public.

22. If the referrer (e.g. faculty, staff, peer or member of the public) wishes to refer a student for professional counselling, the referrer needs to obtain informed consent from the student, with the exceptions mentioned in Section B, Point 19a and 19b of this policy.

23. If the student agreed to receive counselling, the referrer may provide the student the contact details (e.g. phone, email) of SWC to the student, and encourage the student to contact SWC to make a counselling appointment.

24. For at-risk cases, the referrer shall provide SWC the contact details (e.g. phone, email) of the student if the student has not received counselling from any SWC Student Counsellor.

25. If the student with at-risk behaviour does not respond positively to SWC’s offer to help, the Student Counsellor assigned to the at-risk case shall determine the appropriate course of action, in consultation with the Section Head of SWC and/ or the Director of Students, Student Affairs Office.

26. If the referrer wishes to accompany the student to SWC for counselling or consultation, the referrer shall contact SWC to give prior notification unless the situation does not permit it.

27. Information provided by the referrer concerning the student’s issue or condition shall be treated with confidentiality in accordance with the University Code of Conduct on
Confidentiality and Privacy, with the exceptions mentioned in Section B, Point 19a and 19b of this policy.

28. Student Counsellors shall not disclose any information concerning the student to the referrer without written consent from the student, with the exceptions mentioned in Section B, Point 19a and 19b of this policy. In such situations, SWC’s Policy on Release of Information shall apply.

29. In situations where faculty or staff member wish to notify a student by email of their request that the student seeks counselling at the SWC, SWC does not encourage nor approve of the practice of blind carbon copy (bcc) due to ethical concerns as the student is not aware of the complete list of recipients. SWC treats emails in which it has been blind carbon copied (bcc) as though it is not the intended recipient, and thus is not obliged to respond nor take any action.

30. Student Counsellors may seek consent from students to make known the referral to another source such as a faculty or staff of the School as part of the campus community approach to pastoral care.

Section C: Provision for Release of Information by the Student Wellbeing Centre

31. In accordance with the University Code of Conduct on Confidentiality and Privacy, a student’s counselling record or visit to the NTU Student Wellbeing Centre (SWC) is treated as confidential information. SWC shall not disclose such information unless in the following exceptional cases:
   a. That there is an assessment of threat to life or property (at-risk behaviour)
   b. That there is possible liability of a civil and/ or criminal offence if the information is not disclosed
   c. That the information is needed as part of the University’s protocol in crisis management such as when a student is hospitalised or reported missing
   d. That the information is needed by the University’s inquiry panel (e.g. Board of Discipline, Lee Kong Chian Medicine Fitness to Practice Panel) as the panel should be aware of any extenuating circumstances, including psychological issues that the student may have

In the above-mentioned exceptional cases, disclosure of information shall be within the parameters of Duty of Care, which allows disclosure only of what is necessary.

32. Request for release of information shall be subject to approval by the Section Head of SWC and/ or the Director of Students, Student Affairs Office.

Related Procedures

33. Any request for information about a student’s contact with the SWC from a member of the NTU community or a member of the public by phone, email or in person shall be subject to the following procedures:

   a. SWC staff handling the query shall not confirm or refute the enquirer’s query on whether a particular student has attended counselling at SWC.

   b. The enquirer shall provide a reason for seeking the release of information.
c. The enquirer shall attain written permission from the student that the enquirer is entitled to seek and obtain information from SWC. The student is entitled to specify exactly what information is, and what is not, to be released to the enquirer.

d. The enquirer may also inform the student to contact SWC directly to speak to the Student Counsellor, and explain the basis for his/her agreement to the release of information to the enquirer.

e. The enquirer shall apply formally to SWC to request for release of information, citing the reasons for the request, if a written consent from the student is not possible.

f. Approval for release of information shall be sought from the Section Head of SWC and/or the Director of Students, Student Affairs Office.

g. Disclosure of information shall be exercised within the parameters of Duty of Care, which allows disclosure only of what is necessary, even if the student have given consent to disclose the information.

h. If the Student Counsellor needs to disclose information concerning a student to a faculty, staff, student or member of the public, the document (email, letter, etc.) shall be marked “Confidential”, and contain the following text at the bottom of the document:

   *All on distribution list: Our professional assessment and comments above are confidential and therefore the circulation is limited. It is not our practice to extend emails of such nature to staff or faculty. However, should you feel necessary to disseminate the information to a wider audience, please do so judiciously and with due care.*

i. SWC shall inform the enquirer of the limits to circulation of the information – that the information is intended for the enquirer only.

j. The enquirer shall seek permission from SWC if the enquirer intends to circulate the information to another party through any means (e.g. verbal, email).

k. SWC shall communicate its reasons and concerns to the enquirer if the request for release or circulation of information is not approved.

l. The request for release or circulation of information shall be documented and filed by the SWC staff handling the request.

**Section D: Treatment of Confidential Records and Reports in the Student Wellbeing Centre**

34. The NTU Student Wellbeing Centre (SWC) treats all manual and electronic versions of students’ records, case files and notes with strict confidentiality, in accordance with the University Code of Conduct on Confidentiality and Privacy.

35. SWC regards student’s records, case notes and files as akin to medical records for they are classified documents containing the professional counsellor’s observations, comments or information on the students’ issues, conditions and even medical history.
36. Students’ records, case files and notes are properties of SWC, and shall not be removed from its premise without authorisation from the Section Head of SWC.

37. Student’s records, case files and notes shall be kept in a secured place by the SWC staff responsible for the documents.

38. SWC shall hold the student’s records, case files and notes for ten years from the date of termination, in accordance with the Singapore Medical Association’s guidelines on Retention of Records.

39. The student’s records, case files and notes shall be destroyed after ten years from the date of termination.

40. Destruction of the student’s records, case files and notes shall be approved and witnessed by the Section Head of SWC, and documented.

41. The method of destruction shall be by shredding with proper disposal of the remnants or any method that is deemed safe and approved by the Section Head of SWC, in consultation with the Director of Students, Student Affairs Office.

42. The offices and work spaces of the staff of SWC shall be off-limits to unauthorised personnel.

43. Unauthorised access of student’s records, case files and notes is not permitted, and shall be treated as a violation of the University Code of Conduct on Confidentiality and Privacy.

44. Monthly statistical reports are generated by the SWC and are for the attention of the Director of Students, Student Affairs Office only. The monthly report shall not contain details of individual students or information that may link the report with a specific student.

45. Request for information on student’s issues or conditions or statistical information shall be subject to approval by the Section Head of SWC and the Director of Students, Student Affairs Office. If approved, SWC’s Policy on Release of Information and other related policies shall apply.

46. Staff of SWC who has left the service shall not possess the student’s record, case notes or statistical data in hard copies or in other means of storage. This is in accordance with the University Code of Conduct on Confidentiality and Privacy which stipulates that the policies and principles shall continue to apply even after the staff member’s relationship with the University ends.

**Section E: Managing Safety Risks**

47. The NTU Student Wellbeing Centre (SWC) treats the safety of its students and staff with utmost priority.

48. A University staff or student who is alerted of a student who exhibits at-risk behaviour shall inform the Section Head of SWC and/ or any Student Counsellor from SWC.
49. SWC does not handle any case involving a faculty, staff or student who exhibits violent behaviour that poses safety risks to others. In such a situation, the Campus Security Department’s (CSD) procedure on the handling of a violent case where life is being endangered shall apply. The CSD Duty Officer shall contact the Police for immediate assistance so as to safeguard lives and property on campus, and shall notify relevant stakeholders as well.

50. The Section Head may exercise the Duty to Warn and inform any of the following personnel:
   a. Director of Students, Student Affairs Office
   b. Associate Provost, Student Life
   c. Head, Campus Security Department
   d. Head, NTU Medical Centre
   e. Director, Housing Services Office
   f. Section Head, International Student Centre (for international students)
   g. The School’s Assistant Chair or pastoral care staff
   h. Parents/ caregiver of the student
   i. Any other party that the Section Head deems is necessary to be notified

51. The Section Head of SWC or the Student Counsellor managing the at-risk case may convene a Case Discussion for relevant staff to mete out the necessary safety measures.

52. The Section Head of SWC or the Student Counsellor managing the at-risk case may enlist the assistance of Campus Security Department to provide security officers at the premises of SWC or Student Services Centre if the student’s behaviour may pose a safety risk to SWC staff or property.

53. At-risk behaviour may or may not result in an emergency. If an emergency arises, the University’s crisis management plans shall be put into immediate effect, with the direction from key management staff.

54. The Section Head of SWC or the Student Counsellor managing the at-risk case may provide the key management staff a confidential case report, within the parameters of the Duty of Care and/ or Duty to Warn.

Related Procedures

55. Any SWC staff member who needs to work after office-hours or on a non-work day must be accompanied by another staff. Approval shall be sought from the Section Head of SWC.

56. Staff shall avail himself/ herself to the panic button provided by the Student Wellbeing Centre when in a session with the student that may have violent tendency.

57. The Section Head of SWC or a Student Counsellor designated by the Section Head may work with the appropriate school/ department to organise a de-brief session to affected students following a critical incident. For staff of NTU, the assistance of the Staff Counsellor may be enlisted.
Section F: Gifts and Donations to the Student Wellbeing Centre

58. SWC does not accept or solicit monetary rewards, gifts or donations from students, faculty, staff or members of the public.

59. Gifts or donations intended for the SWC shall be made known in writing to the Section Head of SWC, the Director of Students, Student Affairs Office and the NTU Development Office.

60. The Section Head, Director of Students and Development Office will collectively determine the handling of any gift or donation in accordance with the University’s guidelines.