



Student Trusted Contact Policy

1. Introduction

This Policy sets out the approach the University takes to recording the details of students' trusted contacts and how this information will be used. The Policy summarises the circumstances under which the University may use a student's trusted contacts without the student's permission and the decision making process related to this.

UUK's Suicide Safer Universities: Sharing Information with Trusted Contacts Guidance states that families, carers, and trusted contacts can play an essential part in supporting a student who is at risk or about whom there may be serious concerns. Referred to as the triangle of care, the guidance asserts that care is best delivered when trusted contacts, people needing support and professionals/practitioners work together to ensure the best outcome.

The University treats all students, regardless of age on entry, as independent, mature individuals and takes additional steps with students who are under 18 to ensure appropriate Safeguarding risk mitigations are in place.

We recognise that all of our students are individuals with an expectation that information about them is held securely and not shared inappropriately. The University will always balance these considerations with a student's personal circumstances before using the details they have provided and sharing information about the student with their Trusted Contact; wherever possible we will always try to get the student's consent before sharing any information.

2. Purpose

The purpose of this policy is to provide clear and concise information for staff, students and nominated trusted contacts, to ensure the University takes appropriate action, in the event of significant concerns about a student's safety or wellbeing, in a timely and co-ordinated manner to facilitate support and mitigate risk.

The policy aligns to the UUK Guidance: "[Suicide Safer Universities: Sharing Information with Trusted Contacts](#)".

3. Scope

This policy applies to all University of Cumbria students enrolled on a programme offered by the University of Cumbria. This policy also applies to Pears Cumbria School of Medicine (PCSM) students. Students studying through partnership arrangements will be subject to local equivalent procedures.

Any reference to “student(s)” should also be read as apprentice(s).

This policy, and associated procedures, applies in the context of the student’s engagement with the University in terms of their programme of study, placement setting or (resident student) living arrangements.

4. Policy

The University requires all students to nominate, and provide the University with details of, at least one Trusted Contact as part of the annual registration process. Students are asked to provide this information so that it is available in the unlikely event that a situation arises where the University considers the student’s health, wellbeing or safety to be at significant risk.

A Trusted Contact is someone who can be contacted in the event of an emergency or serious concern about a student and/or other’s mental health, wellbeing or safety.

Students should ensure that the Trusted Contact they nominate has agreed to be a Trusted Contact and has been made aware that their contact details will be shared with, and stored by, the University in accordance with the University’s legal responsibilities pertaining to data protection.

A Trusted Contact should be someone who is:

- known to the student
- a UK resident who is readily contactable and able and willing to act on the student’s behalf in the event of a serious incident or emergency where we consider the student’s health, wellbeing or welfare to be at risk.
- NOT a member of University staff

Students may choose to nominate a parent, guardian or family member as their Trusted Contact, but they may nominate any responsible adult.

Students will be asked to provide the following information regarding their trusted contact:

- full name and relationship to the student
- a mobile phone number (or primary telephone number, such as a landline)
- permanent home address

Trusted Contact details are held on the University’s student record system, in accordance with the University’s Current Students Privacy Notice. It is important that all students keep this mandatory information up to date and they can update it at any time via My Student Details.

The University does not require students to provide consent to use their Trusted Contacts as part of the registration process. Issues of consent to contact a Trusted Contact will be considered on a case-by-case basis, in line with the principles set out below:

The University’s policy is that it communicates only with students and not with external third parties (including, but not limited to, parents, guardians or Trusted Contacts), in line with the Current Student Privacy Notice and the General Data Protection Regulations (GDPR).

Therefore, wherever possible, the consent of the student will be sought prior to the University getting in touch with the Trusted Contact and sharing personal

information, including sensitive information obtained in confidence. However, in the following circumstances it may be necessary to share information without the consent of the student:

- a. If, in exercising our reasonable judgement, the University determines it is in the 'vital interests' of the student or another person to do so;
- b. Where the University has a serious or significant safeguarding concern for a student's safety or wellbeing

Vital interest

Vital interest is a legal definition which relates to taking action where it is necessary to protect someone's life or that of another person. Vital interest means:

- serious or life and death situations;
- situations where significant harm to the student or others is likely to occur;
- situations where the student has been involved in, or that there is a risk of, an incident or an emergency situation where the University believes the student or others may come to serious or lasting harm.

Under data protection legislation, we may disclose personal information about a student without their consent when it is in their 'vital interest' to do so. This would normally mean providing details about a student, to a third party such as a member of the emergency services in the event of an accident or emergency medical admission.

The University may also decide to contact a student's named Trusted Contact directly to inform them of a vital interest situation in order to engage them in the provision of support for the student, for example when it is considered that there may be an immediate risk to the student's life or that they may be at immediate risk of serious harm.

Serious or significant concerns for a student's safety or wellbeing

A serious concern about a student under this policy means where a member of the university community believes on the basis of the information available to them that a student is close to a crisis situation in their mental or physical health, or they have well founded and informed fears for the student's safety.

The following are examples of circumstances which may give rise to serious or significant concerns for a student's safety or wellbeing and which may result in the decision being made to get in touch with a student's Trusted Contact and share personal information to secure support for the student, however it is important to note each case will be considered on its own merits. These examples include but are not limited to:

- a student is exhibiting behaviour that may pose a serious risk to their safety and wellbeing or that of others;
- a student has attended or been admitted to hospital in an emergency;
- a student has suffered a serious physical injury, including significant, high risk self-harm, for example where this has resulted in needing significant medical intervention;
- a student has an ongoing serious illness and they appear to be deteriorating;
- a student is experiencing a mental health crisis, or their mental health appears to be significantly deteriorating;
- A student has been reported as "missing" whereby:

- a student ceases to engage with their studies or placement setting and we have been unable to contact them to confirm their safety and wellbeing;
- a student has not recently been seen in their accommodation, we have been unable to contact them;
- a third party has reported significant concerns about a student and we are not able to contact them to establish their safety and wellbeing.

Where the consent of the student has not been obtained, the decision to get in touch with the Trusted Contact will usually be taken by two of the following (and informed, where required, by advice from the Governance and Data Protection Manager):

- Director of Student Services,
- Head of Student Support,
- Mental Health and Wellbeing Manager

Where the concern involves a PCSM or UCIC student the following will also be included in the decision:

- PCSM Head of Operations/Head of School
- University of Cumbria International College Centre Director/Head of Student Services

If a decision is taken to share personal information without consent for a vital interests reason, the student should be informed of the decision, where they are contactable, unless it is determined that to do so would increase the risk of harm to the student or another person.

If any member of staff, or placement provider, considers that there is a need to get in touch with a student's trusted contact (and the individual student has not agreed to this) they must, in the first instance, raise the concern via the Student Enquiry Point (StEP) [Cause for Concern form](#). Out of hours they should contact the University's Security Team to escalate the concern to the Student Services out of hours contact via the Emergency procedures. The Student Services out of hours contact will normally contact another senior colleague (Emergency Officer on call) to discuss the decision or may make the decision without further consultation documenting their reasons.

Roles and Responsibilities

The Director of Student Services is responsible for the operational oversight and implementation of this Policy.

Institute Directors/Deans and Service Directors are responsible for ensuring that all staff within their area are aware of and act in accordance with this Policy.

Programme Leaders are responsible for ensuring that all staff teaching on the programmes they are responsible for are aware of and act in accordance with this Policy.

The (Institute of Health) Head of Practice Learning and Partnership and (Institute of Education Arts and Society) Education Partnerships and Mentor Development Lead working with the Placement Team are responsible for ensuring that this policy and associated reporting procedures are effectively communicated to relevant placement settings.

The Head of Apprenticeships is responsible for ensuring that this policy and associated reporting procedures are effectively communicated to apprentices' employers.

All staff who have access to or become aware of sensitive information about a student have a responsibility to maintain the confidentiality and security of that data and to not share it with a third party, including a student's designated Trusted Contact, unless absolutely necessary and having followed the escalation process set out in the procedures associated with this policy.

Related Policies and Procedures

The University is committed to ensuring that personal information is protected in line with GDPR regulations. This document should be read alongside the University's [General Privacy Notice](#), [Data Protection Policy](#) and [Current Students Privacy Notice](#).

In the event of a suspected or confirmed death of a student, in line with the University's Student Death Protocol, the University will pass the student's next of kin details to the emergency services to support them in their role of contacting them. It is not the role of the University to make contact with the next of kin.

The Student Trusted Contact Procedure is appended to this policy.

Approval, Publication, Implementation & Review

Business Assurance Board is the approving body for this Policy.

The Policy will be available to staff via the Safeguarding and Prevent area of Staffhub.

The Policy will be available to students via the Student Policies and Procedures webpages.

The Director of Student Services will include reporting on this Policy as part of the annual Safeguarding Report which is submitted to:

- Safeguarding Steering Group
- EDIW Committee
- Business Assurance Board
- Audit and Risk Committee

Reporting will include:

- the number of occasions where the decision was taken to release information to the Trusted Contact without the student's consent and the key reasons for these decisions;
- the number of occasions where this Policy has not been followed;
- any lessons learned to improve the Policy.

This policy will be evaluated at the end of the first academic year of implementation and will then be reviewed every 3 years or in the event of any legislature change which may impact the policy.

Appendices

The Student Trusted Contacts Procedure is appended to this policy

Document Control Information

Document Name	Student Trusted Contact Policy
Owner	Director of Student Services, Student Services
Document Location	Safeguarding and Prevent staffhub mini site
Lead contact	Director of Student Services
Approved By	Business Assurance Board
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Related University Policy Documents	General Privacy Notice , Data Protection Policy Current Students Privacy Notice Student Death Protocols
<i>For Office Use – Keywords for search function</i>	



Student Trusted Contact Procedure

Introduction

This procedure summarises how Student Trusted Contact details are collected and updated, the circumstances under which the University will use Trusted Contact details, decision making and who will make contact.

Purpose

The Student Trusted Contacts Procedure sets out the mandatory, University-wide processes, practices or actions required to implement and comply with the Student Trusted Contacts Policy. The Policy and Procedures have been introduced to provide clarity for staff, students and nominated Trusted Contacts, and to ensure that appropriate action is taken in a timely and co-ordinated manner in circumstances where there significant or serious concern for the student's safety or welfare.

Scope

These procedures apply to all University of Cumbria students enrolled on a programme offered by the University of Cumbria. Students studying through partnership arrangements will be subject to local equivalent procedures.

Any reference to "student(s)" should also be read as apprentice(s).

These procedures apply in the context of the student's engagement with their programme of study, placement setting or (resident student) living arrangements.

Procedure

Providing and updating Trusted Contact details

All students are required to provide details of Trusted Contact, on an annual basis, when registering for their programme. This information is held on the University's student record system, in accordance with the University's [Current Student Privacy Notice](#) and current UK data protection legislation.

Students are asked to provide this information so that it is available in the unlikely event that a situation arises where we consider a student's health, wellbeing or safety to be at significant risk.

A Trusted Contact is someone who can be contacted in the event of an emergency or serious concern about a student and/or other's mental health, wellbeing or

safety. Students can nominate anyone they choose to be their Trusted Contact. We expect that for the majority of our students the Trusted Contact will be a parent or guardian. However, this could also be another responsible adult. The relationship the Trusted Contact has to the student will be recorded.

A Trusted Contact should be someone who is:

- known to the student
- a UK resident who is readily contactable and able and willing to act on the student's behalf in the event of a serious incident or emergency where we consider the student's health, wellbeing or welfare to be at risk.
- NOT a member of University staff

Students should ensure that the Trusted Contact they nominate has agreed to be a Trusted Contact and has been made aware that their contact details will be shared with, and stored by, the University in accordance with the University's legal responsibilities pertaining to data protection.

Students will be asked to provide the following information regarding their Trusted Contact:

- full name and relationship to the student
- a mobile phone number (or primary telephone number, such as a landline)
- permanent home address

Trusted Contact details are held on the University's student record system, in accordance with the University's Current Students Privacy Notice. It is important that all students keep this mandatory information up to date and they can update it at any time via My Student Details.

The University will assume that the information is up to date and may need to use it without being able to check with the student first. Therefore, it is important that students review it regularly. The Student Data Management team will also carry out data quality checks to ensure the data in the Trusted Contact fields is credible.

Engagement with the Mental Health and Wellbeing Team (MHWBT)

If a student engages with the Mental Health & Wellbeing Team Talking Therapy Service the Mental Health Caseworker will review the student's Trusted Contact information with them in their first session and will advise the student to update the details in My Student Details if their Trusted Contact has changed.

The Mental Health and Wellbeing Team will discuss the service's confidentiality policy with the student and will highlight the circumstances under which information may be shared with the student's Trusted Contact without the student's consent.

Students are encouraged to raise any questions or concerns with their practitioner regarding confidentiality. The MHWBT's confidentiality statement is clear that if there is significant risk to self, others or the public that confidentiality can be overridden, and information may be shared within the university or/and with external agencies. Any preferences that the student has are recorded in UNITI (talking therapy case management record system (CRMS) and on the student's safety plan (also uploaded to UNITI).

When a referral to the talking therapy service/group therapy is made, details of the student's current GP are requested on the referral form. The MHWBT also collect information about the student's health history, including current mental health support on the referral form. The MHWBT will discuss with the student whether they provide consent for information to be shared with their external mental health

support contacts in session. All contact with external support agencies is then recorded in the CRMS.

Process, Procedure and Decision Making regarding engaging the Trusted Contact

Where a member of staff believes there is a requirement to share information with a student's trusted contact, consent should ordinarily be sought from the student before any further action is taken. Students should provide this consent in writing wherever possible, for example through an email from their University email account.

Staff should document that consent has been obtained for information sharing and confirm what information the student has consented to share. Where it is not possible to obtain written consent verbal consent can be sought and the reason for this should be documented. Staff should submit a [Cause for Concern](#) report detailing the reason for the concern, the consent obtained from the student and the information shared with the Trusted Contact, in order that the contact can be appropriately recorded and to ensure the MHWB team can facilitate appropriate follow up with the student.

If any member of staff, or placement provider, considers that there is a need to get in touch with a student's trusted contact (and the individual student has not agreed to this) they must, in the first instance, raise the concern via the Student Enquiry Point (StEP) [Cause for Concern form](#). On receipt of the referral the Mental Health and Wellbeing Team will conduct a risk assessment of the situation.

If the concern arises outside of normal working hours (Mon- Fri 9am -5pm) staff, or placement provider, should contact the University's Security Team to escalate the concern to the Student Services out of hours contact via the Emergency procedures. The Student Services out of hours contact will normally contact another senior colleague (Emergency Officer on call) to discuss the decision or may make the decision without further consultation documenting their reasons.

If it is not possible for consent to be obtained from the student (e.g. because the student is incapacitated or missing) or because consent is refused, or if there is concern that seeking consent from the student would increase risk to the student or others, then the University may still proceed and engage with the student's Trusted Contact. The circumstances when this course of action would be considered necessary are when action is required to protect the student's vital interests and/or there are serious concerns for the student's health, wellbeing or safety, as detailed within the Student Trusted Contact Policy

How and when the University might inform the Trusted Contact will be decided on a case-by-case basis and authorised by two of the following colleagues (and informed, where required, by advice from the Governance and Data Protection Manager):

- Director of Student Services,
- Head of Student Support,
- Mental Health and Wellbeing Manager,

Where the concern involves a PCSM or UCIC student the following will also be included in the decision:

- PCSM Head of Operations/Head of School
- University of Cumbria International College Centre Director/Head of Student Services

If a decision is taken to share personal information without consent for a vital interests reason, the student should be informed of the decision, where they are contactable, unless it is determined that to do so would increase the risk of harm to the student or another person.

In addition to attempting to contact the Trusted Contact, the University may judge it necessary to pass on the contact details to the emergency services.

Any contact will ordinarily be made by staff in Student Services. However, the circumstances will dictate what is appropriate and the authorising staff will advise who should contact the Trusted Contact.

When a decision is taken to share personal information about a student with their Trusted Contact, the decision will be recorded in Advocate and will include:

- details of the justification for this decision,
- the nature of the information shared and with whom,
- the time and date of the disclosure.

Any personal data shared with the student's Trusted Contact or the emergency services will be proportionate to the situation and limited to what is appropriate to share given the particular circumstances.

Students considered as "missing".

From time-to-time students are reported as missing from the University and concerns are raised about their wellbeing. In such instances there may be:

- Reports that a student has ceased to engage with their studies and colleagues have been unable to contact them to confirm their safety and wellbeing;
- Reports that a student has not recently been seen in their accommodation, and colleagues or fellow students have been unable to contact them;
- Reports from a third party regarding significant concerns about a student and colleagues are not able to contact them to establish their safety and wellbeing.

University staff that have concerns about a potential missing student, or who receive a report that a student is missing, must in the first instance raise this as a Safeguarding [Cause for Concern](#) the StEP.

When reporting a missing student, staff must provide as much information as possible, for example:

- the name of the person who reported the missing student;
- the date when the student was last seen;
- whether there have been any previous concerns about the student's behaviour or health;
- whether there have been previous concerns raised about the student's attendance or academic performance;
- details about the attempts made to establish contact with the student (dates and times of telephone calls and emails sent, etc.);
- details of any known social media activity by the student;
- names and contact details of staff involved; and/or
- the student's course details and University ID number.

The Safeguarding Cause for Concern referral will be received, risk assessed and triaged by the duty member of the MHWB team who will escalate to the Head of Student Support/Director of Student Services as appropriate.

Risk will not be assessed purely on the basis of the length of time a student has been missing. A student who has disappeared over a weekend with an overnight bag and no other problematic signs would not be seen immediately as being at risk. However, a student forgetting essential medication in bad weather with inappropriate clothing for as little as two hours may appropriately be identified as being at risk.

If considered appropriate the Head of Student Support/Director of Student Services will ask a team member to seek to contact the student by telephone, with a follow up SMS text and/or email if there is no response to the telephone call. The content of the SMS text and/or email will advise the student of the concerns for their welfare and will ask the student to respond within a set time period – normally 30 minutes. If no response is received to the SMS text and/or email a second attempt to contact the student will be made. The content of the second communication will re-iterate the concerns for the student's welfare, will ask the student to respond within a set time period (normally 30 minutes) and will advise the student that if no response is received the concerns for their welfare may be escalated to the Police and their Trusted Contact may also be contacted.

Where a student does not respond to the efforts made to contact them as outlined above, two of the following (and informed, where required, by advice from the Governance and Data Protection Manager):

- Director of Student Services,
- Head of Student Support,
- Mental Health and Wellbeing Manager,

Where the concern involves a PCSM or UCIC student the following will also be included in the decision:

- PCSM Head of Operations/Head of School
- University of Cumbria International College Centre Director/Head of Student Services

will consider whether it is appropriate to contact the trusted contact and/or to report the student as missing to the police.

The Head of Student Support or Director of Student Services will keep senior University colleagues updated on developments as appropriate and in line with data protection and immigration legislation, and confidentiality obligations.

Care must be taken in respect of disclosure of information, both within the University community, and in particular, to those external to the University. This includes those who are, or claim to be, close personal friends, or family members, recruitment agents, employers, landlords or even the police or other government employees. Information should only be shared if it is relevant to the situation.

Police Involvement

Liaison with the police will be managed by the Head of Student Support, or Director of Student Services or their delegates.

Requests by the police for the personal details of students who they regard as missing should be dealt with as a data protection enquiry.

Post incident management following the location of the “missing” student.

When a student considered to be missing is located, the student will be offered support by the University’s support services to address any underlying difficulties. It may also be appropriate to remind the student of the University’s Attendance Policy requirements.

The University will encourage the student to respond to concerned friends and family, if they are in a position to do so. If the University has previously informed the Trusted Contact that the student is missing and the student is unwilling or unable to contact their Trusted Contact, then the Head of Student Support or nominee will normally update the trusted contact.

If the student was reported as missing by staff outside of Student Services, Student Services staff will inform those staff that the student has been located and may provide other appropriate information. The Head of Student Support or Director of Student Services will update senior colleagues as appropriate.

If the student is an international student with a Tier 4 visa, they must be advised to speak to the International Support team as soon as possible as they may be in breach of their visa conditions.

Roles and Responsibilities

The Director of Student Services is responsible for the operational oversight and implementation of these procedures.

Institute Directors/Deans and Service Directors are responsible for ensuring that all staff within their area are aware of and act in accordance with these procedures.

The (Institute of Health) Head of Practice Learning and Partnership and (Institute of Education Arts and Society) Education Partnerships and Mentor Development Lead working with the Placement Team are responsible for ensuring that the Student Trusted Contacts Policy and these associated procedures are effectively communicated to relevant placement settings.

Programme Leaders are responsible for ensuring that all staff teaching on the programmes they are responsible for are aware of and act in accordance with this Policy.

The Head of Apprenticeships is responsible for ensuring that the Student Trusted Contacts Policy and these associated procedures are effectively communicated to apprentices’ employers.

All staff who have access to or become aware of sensitive information about a student have a responsibility to maintain the confidentiality and security of that data and to not share it with a third party, including a student’s designated Trusted Contact, unless absolutely necessary and having followed the escalation process set out in these procedures.

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The Policy and Procedures will be available to staff via the Safeguarding and Prevent area of Staffhub.

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The Director of Student Services will include reporting on the Policy as part of the annual Safeguarding Report which is submitted to:

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- EDIW Committee
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- Audit and Risk Committee

Reporting will include:

- the number of occasions where the decision was taken to release information to the Trusted Contact without the student's consent and the key reasons for these decisions;
- the number of occasions where this Policy has not been followed;
- any lessons learned to improve the Policy.

These procedures will be evaluated at the end of the first academic year of implementation and will then be reviewed every 3 years or in the event of any legislature change which may impact the policy.