

Trusted Contact Privacy Notice

Our Privacy Notice explains the University's processing of trusted contact personal data. We provide here a summary of how we use trusted contact information. We go into more detail in the Privacy Notice.

Summary

1. We ask all students to provide trusted contact information each year at registration.
2. Usually, their trusted contact will be a parent, partner, family member, carer or guardian. However, it does not have to be.
3. The nominated trusted contact must be able and willing to act on the student's behalf in case of a serious incident or serious concerns about a student's safety or mental health.
4. The information collected is the trusted contact's name and title, relationship with the student, mobile phone number, landline phone number, e-mail, and address.
5. We ask students to ensure their trusted contact is
 - a) aware they nominated them as a trusted contact and provided their contact details to the University; and
 - b) readily contactable
6. Students can change the trusted contact at any time in the year and as often as they wish. They can do so by logging into the student portal. They can remove the trusted contact, but we strongly advise providing us with a trusted contact as it is in their interests.
7. We only make contact with trusted contacts in extreme circumstances. We do not use trusted contact information to tell someone about a student's studies at the University. We only use it when we have a concern about the student's health, safety or welfare.
8. We will use the trusted contact information as a public interest task. It is in the public interest to ensure all our students are kept safe and to contact nominees in the event of an emergency.
9. The trusted contact can ask the University to remove their details. We will let the student know so they can nominate another trusted contact.
10. We also use personal data to protect the vital interests of the student or another person's vital interests in life-or-death situations. An example is when a person is unconscious after an accident. We may inform the trusted contact in these circumstances.

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11. When we process special category data relating to trusted contacts, we do so because it is necessary for a substantial public interest concerning safeguarding individuals.

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1 Introduction

1.1 This Privacy Notice explains the types of trusted contact personal data the University holds. It explains what information we collect, how we will use it, with whom and when we will share it, and the steps to ensure it stays private and secure. It applies to you if

- as a student, you nominated a trusted contact
- you are a designated trusted contact

1.2 We know there is a lot of information. However, we want to inform you fully about your rights and how the University uses your data. We hope the following sections will answer any questions you have. If not, please do get in touch with us. We provide a summary of the Privacy Notice.

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- 1.3 We will need to update this Privacy Notice from time to time. We will notify you of any significant changes. You are welcome to come back and check it whenever you wish. You can obtain the current version of this [Privacy Notice](#) on our website.
- 1.4 We welcome comments on the Privacy Notice and take any comments into account in updating the Notice.

2 Canterbury Christ Church University as Data Controller

- 2.1 Canterbury Christ Church University is the data controller for the processing activities described below. It means the University decides why and how we process your personal information.
- 2.2 Our contact details are as follows:
- Canterbury Christ Church University
North Holmes Road
Canterbury
CT1 1QU
Website: <https://www.canterbury.ac.uk/>
- Contact details: dp.officer@canterbury.ac.uk
- 2.3 Where this Privacy Notice refers to “we”, “our”, “us”, or “the University”, we mean Canterbury Christ Church University. When we refer to “you” or “your”, we mean a student or trusted contact.
- 2.4 We will only process your information in line with a relevant legal obligation. We hold electronic and paper data that includes your personal details and related information.
- 2.5 Our [Data Protection Policy](#) explains our approach to managing personal information.

3 The legal bases we rely on

- 3.1 Data protection law identifies several reasons for collecting and processing your personal data. In this section, we outline the legal basis for processing your data.

Public task

- 3.2 We process your personal data to enable us to perform a task in the public interest or the exercise of our official authority. It is in the public interest to ensure all our students are kept safe, and we can contact their nominees when serious concerns about their safety, mental health, or an emergency occur.
- 3.3 In making the legal basis a public interest task, the University took into account the following:

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- In June 2021, the Minister of State for Universities, Michelle Donelan, expressed the expectation for all higher education providers to have suicide prevention strategies.
- On 26 August 2021, the Department for Health and Social Care issued the *Information sharing and suicide prevention: consensus statement*. The suicide prevention strategy for England places a new emphasis on families bereaved or affected by suicide. It aims to improve information and support for families concerned about a relative who may be at risk of suicide and better support the bereaved.
- On 14 September 2021, the Information Commissioner's Office (ICO) wrote to the University to stress that data protection law does not stop universities from sharing students' data in an emergency.
- In October 2022, Universities UK published [information-sharing guidance](#) to help universities decide when and how to involve families, carers or trusted contacts when significant concerns about a student's safety or mental health arise.

Vital Interests

3.4 We may need to process your data to protect another person's vital interests. It will take place only where we cannot process your data on another legal basis.

3.5 For example, we may disclose information to protect your vital interests following your admission to a hospital A & E department with life-threatening injuries.

3.6 We may also share your personal information with your trusted contact, where we act to protect your vital interests.

4 When we collect personal data

4.1 We collect trusted contact details each year when you register as a student.

4.2 The information collected is the trusted contact's name and title, relationship with the student, mobile phone number, landline phone number, e-mail, and address.

4.3 Usually, the trusted contact will be your parent, partner, family member or guardian. However, it does not have to be.

4.4 The nominated contact must be able and willing to act on your behalf in case of a serious incident or serious concerns about your safety or mental health.

4.5 We ask you to ensure your trusted contact is

- a) aware you have nominated them and provided their contact details to the University and

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b) readily contactable

4.6 You can change the trusted contact any time in the year and as many times as you wish. You can do so by logging into the student portal. You can remove the trusted contact, but we strongly advise you to provide us with a trusted contact as it is in your interests.

4.7 You may give us information about “special categories” of data, including your racial or ethnic origin, religious or philosophical beliefs, health, sex life or sexual orientation. When we process special category data relating to trusted contacts, we do so because it is necessary for the substantial public interest concerning safeguarding children and individuals. It is processed only when it is essential to

- a) protect individuals from neglect or physical, mental or emotional harm, or
- b) protect the physical, mental or emotional well-being of an individual

4.2 We explain our approach in our [Policy Statement on the Use of Applicant and Student Special Category Personal Data and Criminal Records Data](#).

5 How we use your personal information

5.1 We only make contact with your nominated trusted contact in extreme circumstances, for instance:

- We become aware of a severe decline in an existing reported mental health condition.
- A student seems to be struggling to keep safe, including taking repeated overdoses or increasing the severity of self-harming behaviours.
- A student explicitly tells us of an intention to end their life by suicide.
- A student is exhibiting behaviour that may pose a serious risk to their safety and well-being or to others.
- A third party has reported significant concerns about a student, and we cannot contact them to establish their safety and well-being.

5.2 We do not use trusted contact information to tell them about a student’s studies at the University. We use it only when we have a concern about the student’s health, safety and welfare.

6 Who we might share your data with

6.1 We might share your data with

- a) your trusted contact when we are performing a public interest task, protecting your vital interests or safeguarding children or adults at risk

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- b) emergency and professional medical services, and other appropriate individuals and organisations, when we are protecting your vital interests or safeguarding children or adults at risk

7 How long we keep trusted contact information

- 7.1 We keep trusted contact information as long as you maintain it in our student records.
- 7.2 We will remove the contact information when
 - a) the nominated contact asks us to do so, but we will let the student know so there can be a new nomination
 - b) the student completed their studies with or withdrew from the University more than a year previously

8 How we protect and store your personal data

- 8.1 We know how much data security matters to you. We will treat your data with the utmost care and take all appropriate steps to protect it.
- 8.2 We are committed to the data protection principles for handling information. We hold all personal information securely and only transfer data within the University on a need-to-know basis so that we can support you.
- 8.3 We regularly monitor our system for possible vulnerabilities and attacks and conduct penetration testing to identify ways to improve security.
- 8.4 We routinely store the information you provide on our secure servers or cloud-based systems in the UK or the European Economic Area (EEA).
- 8.5 Should we transfer your information outside the EEA, we ensure appropriate security measures to protect your privacy rights. It would be by imposing contractual obligations on the recipient of your personal information or ensuring the recipients subscribe to 'international frameworks' that provide adequate protection.

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9 Your rights as a data subject

9.1 You have the right to request a copy of the information we hold about you. There is no charge; you can request it orally or in writing. If you want the information, you can e-mail us at dp.officer@canterbury.ac.uk. We will respond in a calendar month.

9.2 You have the following rights:

- To ask for inaccurate personal data to be rectified or completed if incomplete.
- To have personal data erased in certain circumstances.
- To request the restriction or suppression of your personal data in certain circumstances.
- To request the portability of your personal data in certain circumstances.
- To object to the processing of your personal data in certain circumstances.

10 Who to contact if you have a query

10.1 Should anything be unclear, you can contact our Information Governance Team (e-mail: information.governance@canterbury.ac.uk). Our team is happy to answer any queries you may have concerning this Notice or how we process your personal data.

11 Where to make a Complaint

11.1 You can contact the University's Head of Data Protection to complain about how we handle your data.

11.2 The Head of Data Protection is

Myriam Tavernier
Canterbury Christ Church University
Invicta
North Holmes Road
Canterbury
CT1 1QU
E-mail: dp.officer@canterbury.ac.uk
Telephone: 01227 767700

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12 Contacting the Regulator

12.1 Should you feel we did not handle your data correctly or are unhappy with our response to your requests regarding using your personal data, you can complain to the Information Commissioner's Office. The contact details are:

The Information Commissioners' Office
Wycliffe House
Water Lane
Wilmslow
Cheshire
SK9 5AF

Telephone: 0303 123 1113

Website: www.ico.gov.uk