

Policy on Trusted Contacts for Students

Approved by: Senior Management Team	Effective date: 4 July 2023	Next review: 1 July 2026
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Policy statement

Canterbury Christ Church University and the Christ Church Students' Union have prioritised students' mental health. This commitment is key to ensuring students' safety, particularly concerning suicide. It forms part of our commitment to safeguarding in our [Safeguarding Statement of Policy](#).

An essential part of the University's proactive safeguarding arrangements is to have a trusted contact for each student. The student nominates a trusted contact who can act on the student's behalf in case of a serious incident or emergency.

Who needs to know about the Policy

- University staff
- Students
- Applicants
- Trusted Contacts

Purpose of the Policy

The Policy aims to set out the means of collecting trusted contact details and the legal basis and arrangements for sharing information.

In developing the Policy, we took into account the following:

- 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 to support better those bereaved by suicide.
- On 14 September 2021, the Information Commissioner's Office (ICO) wrote to the University to stress that data protection law does not stop universities and colleges from sharing students' personal data in an urgent situation or emergency.
- On 6 October 2022, Universities UK (UUK) issued [Suicide-safer universities: sharing information with trusted contacts](#), stating universities could help save lives by adopting a proactive response to suicide prevention.

Contacts

The University Directorate of Student Wellbeing, Community & Belonging is responsible for the following:

Policy on Trusted Contacts for Students

- Overseeing the sharing of information with trusted contacts
- Providing advice and assistance on making use of trusted contacts
- Issuing Guidance and templates to implement the Policy
- Arranging for training

The team can be contacted by emailing: mentalwellbeing@canterbury.ac.uk

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Policy on Trusted Contacts for Students

Collection of Trusted Contact Details

The University includes collecting trusted contact details as part of the enrolment and registration process.

The University explains why the contact is required and when we involve contacts in the [Trusted Contact Privacy Notice](#). We undertook a Privacy Impact Assessment.

Students do not have to provide trusted contact details but are strongly advised to do so. They can change the trusted contact details at any time.

The University's Student Wellbeing Service has a supplementary trusted contact procedure as part of professional risk assessment and risk management protocols. Student Wellbeing Service practitioners

- routinely encourage students to use the support available from relevant trusted contacts and
- obtain consent from the student to contact these trusted supporters where applicable.

The practitioners draw on their expertise when making clinical assessments of risk, including considering the risks and benefits of contacting a trusted contact without consent.

Legal Basis for the Use of Trusted Contact Details

The underlying task, function or power must have a clear basis in law.

Public Interest Task

The University identified a public interest task as the legal basis for processing the contact information. We rely on a public task as a lawful basis if we need to process personal data 'in the exercise of official authority.' It covers:

- public functions and powers set out in law; or
- to perform a specific task in the public interest set out in law

The University determined there were grounds for using the trusted contact information as a public task in safeguarding situations. The purpose is to perform a public interest task or exercise official authority in safeguarding individuals.

When processing special category data, it is necessary for reasons of substantial public interest concerning safeguarding children and individuals at risk of harm, and essential to:

- (a) protect individuals from neglect or physical, mental or emotional harm, or
- (b) protect the physical, mental or emotional wellbeing of an individual.

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We explain how we use special category data in our [Policy Statement on the Use of Applicant and Student Special Category Personal Data and Criminal Records](#).

To help meet our accountability and transparency obligations, we will record our decision to engage with a trusted contact, including why it was necessary to perform a task in the public interest or exercise our official authority.

An individual has a right to object to using the public interest task, and we must take account of the objection. However, the right to object is not absolute. We will consider why individuals are opposed to the processing of their data. We can refuse to comply if:

- we can demonstrate compelling legitimate grounds for the processing, which override the interests, rights and freedoms of the individual; or
- the processing is for the establishment, exercise or defence of legal claims.

The Trusted Contacts [Privacy Notice](#) explains how the University uses trusted contact data.

Vital Interests

It is also necessary to protect the vital interests of the student or another person's vital interests in life-or-death situations.

We consider the student's preferences wherever possible before the University shares personal information, including special category data. However, it may be necessary to share without the student's consent where it is required to protect their vital interests or those of another person.

Importance of Confidentiality

Confidentiality is core to the delivery of our support services. Confidentiality will be respected other than in exceptional circumstances. Wherever possible, students should be at the centre of any decision about their care. Involving students in the decision-making processes will remain a fundamental premise. Any decision to engage wider networks without the specific consent of the at-risk student needs to be based on appropriate judgments.

The University addresses the need to respond to students in crisis in several ways, including a close partnership with the NHS and various external agencies and charities. A memorandum of understanding with the local NHS services for a student care pathway is in place. In addition, the University has a data-sharing agreement with the Police and local councils.

Sharing Information with Trusted Contacts

The UUK Guidance sets out what universities should consider when deciding when and how information should be shared with family and friends when there is a risk of serious self-harm or suicide.

The University regards an essential part of our proactive response as encouraging the involvement of families, carers and trusted contacts. To this end, we may include family and friends in their support where there is a genuine safeguarding concern for the student's safety.

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Wherever possible, students should be at the centre of any decision about their care. Any decision to involve wider networks without the specific consent of the student at risk needs to be based on appropriate clinical judgement.

Sharing information where the Student does not Provide Trusted Contact Details

Where obtaining agreement from the student about involving trusted contacts is impossible, the University will make a risk-based and appropriately recorded decision to include others.

In using special category data, we will follow the safeguarding provisions in the [Trusted Contact Privacy Notice](#).

Information Sharing

To further this Policy, the University will develop arrangements for

- the sharing of information internally to build a full picture of the risk to its students
- our information-sharing procedures, staff training, and student databases work to support staff in sharing concerns about a student and escalating those concerns appropriately
- designated, appropriately trained staff to decide whether to share information with trusted contacts
- provide supporting operational documents setting out the approach to sharing information with a trusted contact

The University will draw on the professional expertise of practitioners in Student Wellbeing Services when determining whether to use a student's trusted contact information.

Professional decisions will follow the practitioners' professional code of practice.

Document Information	Description of Document Information					
Document Title	Policy on Trusted Contacts for Students					
Department Owner	Directorate of Student Wellbeing, Community & Belonging					
Document Category	<table border="1"> <thead> <tr> <th>Category</th> <th>Description of category</th> </tr> </thead> <tbody> <tr> <td>Students</td> <td>Documents directly affecting student life at the University</td> </tr> </tbody> </table>		Category	Description of category	Students	Documents directly affecting student life at the University
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Students	Documents directly affecting student life at the University					
Document Owner	Deputy Vice-Chancellor					
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