

# King's College London

## Student Trusted Contact Procedure

### 1. Introduction

- 1.1 As a higher education institution, King's College London ("the university") has a duty of care to all members of our community. This includes the responsibility to take reasonable measures to protect the health and safety of all our students and staff. Our duty of care must be contextualised with our obligations under Data Protection and other relevant legislation.
- 1.2 The university is required to process student data in line with data protection legislation. This includes strict regulation of the information that we may share with a third party about a student, which includes parents, carers, family members, legal guardians, or other named contacts (unless the student is a minor). Advice on the requirements and relevant exemptions on this can be sought from the university's [Data Protection team](#).
- 1.3 The university collects 'trusted contact details' for each of our students, these details are held securely and confidentially by [Student Records](#). These details include a contact name, telephone contact, email contact and the nature of your relationship to this person e.g. legal guardian, parent etc. This information may only be accessed under specific conditions as outlined in relevant UK legislation and this procedure.
- 1.4 This procedure does not apply in any circumstances in which a student provides details of someone that they wish a member of staff to contact on their behalf i.e., direct consent has already been given.
- 1.5 Where direct consent has been given, the member of staff should ensure that they keep records in an appropriate secure manner for later reference, in line with the university [Retention Requirements](#).
- 1.6 The university supports the aims of the [Information Sharing and Suicide Prevention Consensus Statement](#) coordinated by the Department of Health. These guidelines aim to improve information and support for families who are concerned about a relative who may be at risk of suicide. This procedure forms part of the university's commitment to this statement.
- 1.7 Additional guidance will be provided to all staff about the implementation and ongoing use of this procedure. This will include specific detailed guidance for those staff members in roles that are part of the escalation and decision-making process.
- 1.8 This procedure applies to the usual day-to-day study or living arrangements for students at university. Where students are required to study away from the university, for example on field trips, work placements or study at another Higher Education Institution, there will need to be specific protocols put in place as is expected under other university procedures and in line with requirements of the hosting institution or field trip risk assessment. Where there is

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concern raised about a student away from the university, advice can be sought from the relevant faculty Safeguarding Lead, Senior Faculty Tutor and/or the [Student of Concern Team](#), regarding the appropriate procedures to apply.

- 1.9 Where it is considered appropriate to do so, this procedure may be applied under the [Support for Study](#) process, or under any other university process where consideration of contacting a student's trusted contact is taking place.

## 2. Circumstances when the University may use trusted contact details

- 2.1 There are two types of instances in which the university may use the trusted contact details held on Student Records. These are:

- 1) in a student's '[vital interest](#)' (life or death situations), or
- 2) where the university has a serious concern for the student and both the university and the student have a [legitimate interest](#) in ensuring that this serious concern is acted upon.

In either circumstance, the decision will be subject to a formalised review, which allows both for timely action to be taken, and appropriate scrutiny of the decision-making process.

As referenced in 1.4, this procedure does not apply in any circumstances in which a student provides details of someone that they wish a member of staff to contact on their behalf. In this instance direct consent has already been given.

- 2.2 Vital interest: Vital interest is a legal definition which relates to acting where it is necessary to protect someone's life or that of another person. Under UK 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, including their trusted contact details, to a third party. For example, 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, for example if a student was experiencing a prolonged mental health crisis and was not engaging with university or NHS support services.

- 2.3 The following are examples of circumstances that are considered of "vital interest". A student collapses during a lecture and is unconscious. The lecturer calls for an ambulance and gives the paramedics the student's name and address. A student in residences makes an attempt at suicide, there are concerns that they cannot keep themselves safe. An ambulance is called, and Residences staff disclose the student's name and address.

- 2.4 Serious concerns: A serious concern about a student under this procedure is when a member of the university believes, based on the information available to them, that a student is close to a crisis in their mental or physical health, or they have fears for the student's safety that do not meet the 'vital interest' criteria.

- 2.5 The following are examples of circumstances that are considered to meet the criteria of a "serious concern". These examples are provided to give a benchmark of the seriousness of a concern that falls under this procedure and is not exhaustive:

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- A student has suffered a serious physical injury, including an episode of high-risk self-harm, for example where this has resulted in needing significant medical intervention.
- A student ceases to engage with their studies and we have been unable to contact them, in line with the [Prolonged Lack of Contact Procedure](#)
- A student has not been seen in their halls of residence and it has not been possible to contact them, in line with the [Prolonged Lack of Contact Procedure](#)
- A student has an ongoing illness, and they appear to be significantly deteriorating
- A student appears to be approaching a significant mental health crisis.

If a member of staff is concerned about a student and is unsure if this procedure would apply, additional guidance is available from faculty Safeguarding Lead, Senior Faculty Tutor and/or the [Student of Concern Team](#). If in any doubt, then please submit a Student of Concern referral to enable rounded support for the student.

It is noted that many of the examples above may escalate to a 'vital interest' concern if intervention does not occur.

### 3. Providing trusted contact details to the university

- 3.1 All students are requested to provide details of a trusted contact through the registration and enrolment processes. This information is held on the King's College London's [Student Records](#) system, in accordance with the university's [Data Protection Policy](#).
- 3.2 On occasion, and only where appropriate, the university will endeavour to request advance consent from the student to use trusted contact details.
- 3.4 Students should nominate a responsible adult of their choice to be their trusted contact. We expect that for many of our students, the trusted contact will be a parent, carer, legal guardian, or spouse/partner, but it does not have to be. When a student is contemplating who they wish to nominate they need to consider how this person would be able to provide them support in the event of an emergency, or where serious concerns are raised about their wellbeing. It is helpful to think about nominating a trusted contact who either lives in the UK and/or is an English Speaker.
- 3.5 Students should ensure that:
- the person they have nominated as their trusted contact understands that this is the case
  - the person understands what it means to be a trusted contact
  - they have given their permission to be an trusted contact
  - they understand that their contact details will be given to the university
- 3.6 Students are asked to keep these details up to date and may change these and other personal details at any time by logging onto [Student Records](#). 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 their details regularly and update them, as necessary.
- 3.7 If, for whatever reason, a student does not feel able to provide details of a trusted contact, they should raise this with their Department Senior Tutor.

#### 4. Considering using trusted contact details

- 4.1 Every student is an individual and their personal circumstances, at the time, will be taken into consideration before using the trusted contact details provided. The professional judgement of our Student of Concern Team will be used, in conjunction with other members of staff with a knowledge of the student, in deciding whether to alert the trusted contact to a welfare concern. Other staff who may be included in this decision making includes:
- Faculty Senior Tutors
  - Senior Tutors
  - Student Experience Managers
  - Faculty Safeguarding Leads and university Safeguarding leads
  - Wellbeing and Welfare Advisers
  - Student of Concern Team
  - Counselling Services
  - Disability Team
  - the Residences team, as part of their specific roles
  - may also include other staff that are trained in Mental Health First Aid
- 4.2 If any member of staff considers that the student's trusted contact needs to be contacted, either in a student's "vital interest" or because of a "serious concern", they should discuss the case with their Department Senior Tutor, Faculty Senior Tutor or Faculty Safeguarding Lead as appropriate. These parties will contact the [Student of Concern Team](#) for further guidance. Depending on the nature and or immediacy of the concern, staff members can make a direct referral via the [Student of Concern](#) referral form.
- 4.3 The decision to contact a student's named trusted contact will be made jointly by the relevant staff and the Student of Concern Team (or their nominees). This group will arrange a case discussion at which they will consider the professional views of other relevant members of staff, for example the student's Departmental Senior Tutor and the residences team, etc. as appropriate.
- 4.4 Where it is not possible for all three decision makers (or their nominees) to convene a case discussion within 48hrs of the concern being raised, or if a decision is needed more rapidly, the decision can be taken by two of the three parties if their views are unanimous. Cases may also be referred to the university [Safeguarding Lead](#) in the absence of a third decision maker or where additional guidance would be beneficial.
- 4.5 In the discussion, agreement will be reached about who will reach out to a student's trusted contact. This could be the Departmental Senior Tutor, Faculty Senior Tutor, Designated Safeguarding Officer or a member of the Student of Concern Team.
- 4.6 On occasion, and where it is appropriate to do so, the university will endeavour to advise the student of our intention to notify their trusted contact. An example of such a circumstance is where a student has been raised under the Prolonged Lack of Contact Procedure and the student has failed to respond to communications sent in line with this procedure. However, it may not always be possible to advise students of our intention to contact trusted contact, particularly if doing so would cause a situation critical delay.

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## 5. Out of hours

- 5.1 Where a member of staff needs advice in relation to matters referred to in this policy 'out of hours' (5pm to 9am Monday to Friday, at weekends and during university closure) they should contact the university's [Security Team](#) who will be able to provide support and guidance.
- 5.2 Where there are concerns pertaining to a student residing in university halls, contact can be made with the Residences On-Call Manager (mobile number 07775227286). This team will only have access to information about students residing in halls.

## 6. Death of a student

- 6.1 In the event of a suspected or confirmed death of a student, the university [Death of a Current Student Procedure](#) will apply. In these circumstances, the university may pass the trusted contact details to the emergency services to support them in their role of contacting next of kin, for example if the death occurs on campus or in Residences.
- 6.2 This procedure outlines the actions the university will take where a death has occurred, including how the university will support the family of the deceased following such a death.

## 7. Record keeping

- 7.1 Complete the "Case Conference Record for Student Trusted Contact" (Appendix A). This record will be kept by the Student of Concern Team (or their nominee), of all instances in which a case discussion is held about a student. This will ensure an accurate record of all instances under this procedure, in which trusted contact details are used, in line with GDPR legislation.
- 7.2 The record will give sufficient detail of the discussion and agreed actions, including the final decision and, if necessary, who is authorised to make contact.
- 7.3 The record will be held securely and confidentially in line with the relevant retention requirements as detailed in [KCL Student Data Collection Notice](#) and [KCL Records Retention Schedule](#)
- 7.4 The university may use anonymised data for internal reporting purposes to support the wellbeing of students. No individual will be able to be identified in such reports
- 7.5 You can find out more about the university's management of personal data in the King's College London [Core Privacy Notice](#)

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**Appendix A****Case Conference Record for Student Trusted Contact***This record, and related files, should be stored securely in line with GDPR legislation*

Date of case conference	
Name of student	
Student Number	
Faculty /Department	
Level & year of study at time of conference (e.g. UG year 1)	
Home or international student?	
Case conference attendees	<b>Attending:</b>  <b>Apologies</b>
Overview of initial activity and facts known	
Confirmed Trusted Contact liaison (name & job title)	
<b>AGREED ACTIONS</b> (Detail the action, who owns the action, the date the action has been completed and any reference e.g. to a file or other pertinent information)	
Agreed actions for contacting Trusted Contact	<b>Action:</b> <b>Owner:</b> <b>Date completed:</b>

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Agreed date for review of progress	<b>Action:</b> <b>Owner:</b> <b>Date to be completed:</b>
Outcome of student case <i>(e.g.) was contact made with Trusted Contact, update on student's circumstances (re-engagement with study/interruption/Support for Study?)</i>	<b>Action:</b> <b>Owner:</b> <b>Date to be completed:</b>