

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. Advice on the requirements and relevant exemptions on this can be sought from the University's [Information Compliance 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 [Records Management Policy](#).
- 1.6 The University supports the aims of the [Information Sharing and Suicide Prevention Consensus Statement](#) co-ordinated 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 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 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 Policy](#), 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.

- 2.2 Wherever possible, the decision will be subject to a review, which allows both for timely action to be taken, and appropriate scrutiny of the decision-making process. There will be circumstances when this procedure should not be applied. Please refer to 4.2 of this procedure for further guidance.

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.

- 2.3 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 will consider reaching out to a Trusted Contact if we become aware of a vital interest situation for example, if a student is experiencing a prolonged mental health crisis and not engaging with University or NHS support services.

- 2.4 In an emergency, the Emergency Services should be the first point of call. Once that support has been provided, a decision can then be made with regards to speaking with Trusted Contact.

- 2.5 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.

- 2.6 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.

- 2.7 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:
- 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 Guidance](#)
 - A student aged under 18, who lives in King's residences fails to comply with the Under 18 Safeguarding Protocol in line with the [Under 18's Students in Residences Policy](#)
 - 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 Guidance](#)
 - A student has an ongoing illness, and they appear to be significantly deteriorating
 - A student has been using drugs/and or alcohol in a manner which is putting themselves/others at risk of serious-harm
 - 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 [Designated Safeguarding Officer](#), Senior Faculty Tutor and/or the Student of Concern Management Group/Chairs. 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 Governance 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.
- 3.3 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.
- 3.4 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 a Trusted Contact
 - they understand that their contact details will be given to the University
- 3.5 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.

- 3.6 If, for whatever reason, a student does not feel able to provide details of a Trusted Contact, they should raise this with their faculty [Designated Safeguarding Officer](#) .

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 Management Group 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
 - Student Support Managers
 - Faculty Safeguarding Leads and University Safeguarding leads
 - Wellbeing Advisers
 - Student of Concern Mental Health and Welfare Team
 - Counselling & Mental Health Support Service
 - Disability Support and Inclusion
 - 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 because of a "serious concern", they should discuss the case with their Department Senior Tutor, Faculty Senior Tutor or [Faculty Designated Safeguarding Officer](#) . 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 In the following circumstances, it is **not** necessary to seek oversight per this procedure and staff should speak with Trusted Contact:
- The situation meets the threshold of "vital interests" i.e. life or death situation **and**
 - The student is outside of the UK, and it is not possible to refer to Emergency Services
- Please ensure that you share details of the incident via a referral to [Student of Concern](#). Refer to the [Student of Concern Procedure](#) for further details on how the University responds to situations such as these.
- 4.4 The decision to contact a student's Trusted Contact will be made jointly by the relevant staff and senior members of the Student of Concern Management Group (or their nominees) e.g.
- Associate Directors for Advice, Wellbeing & Welfare
 - Associate Director for Counselling & Mental Health
 - Director of Student Support & Wellbeing Services
 - Head of Mental Health Support

- Head of SOC Welfare
- Head of Support for Study

This discussion could take place via a case conference, discussion in a SOC Management Group or, depending on the nature and urgency of the concern via telephone or email.

Cases may also be referred to the University [Safeguarding Lead](#) in the absence of the above colleagues or where additional guidance would be beneficial.

- 4.5 In the discussion, agreement will be made 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 other staff members deemed appropriate.
- 4.6 The following members of the Student of Concern Management Group can be called upon to speak with a Trusted Contact:
 - Director of Student Support & Wellbeing Services
 - Associate Director Advice, Wellbeing & Welfare
 - Associate Director Counselling and Mental Health
 - Associate Director Disability Support & Inclusion
 - Head of Mental Health Support
 - Head of Disability Support and Inclusion Mental Health
 - Head of Support for Study

- 4.7 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.

Unfortunately, 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.

Appendix A outlines this process.

5. Record keeping

- 5.1 Please complete the [Outreach to Trusted Contact Record](#). This record will be kept by the Student of Concern Team (or their nominee) and will ensure an accurate record of all instances under this procedure, in which Trusted Contact details are used, in line with GDPR legislation.
- 5.2 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 Management Policy](#)
- 5.3 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.
- 5.4 You can find out more about the University's management of personal data in the King's College London [Core Privacy Notice](#).

6. Out of hours

- 6.1 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. Please ask to speak to the Head of Security.
- 6.2 Where there are concerns pertaining to a student residing in University halls, contact can be made with the Residences On-Call Manager (mobile number 0207 848 5850). This team will only have access to information about students residing in halls.
- 6.3. If you believe this is an emergency situation and a student is in need of emergency support, please refer to [Crisis Support](#).

7. Death of a student

- 7.1 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.
- 7.2 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.

Appendix A:
Student Trusted Contact Procedure

