

Student Trusted Contact Policy

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1 Introduction

1.1 Key Principles and Purpose of Policy

The University of Bath is committed to fostering a culture of care and to protecting student welfare. As part of this commitment, all students are required to provide up-to-date contact details for a trusted contact throughout their registration at the University.

This policy outlines the circumstances and process by which the University may:

- Contact a student's trusted contact
- Contact other individuals in a student's personal support network
- Share a student's trusted contact details with a third party
- Share sensitive personal information about a student with external professionals and statutory agencies

This policy has been developed in line with relevant UK legislation and current best practice and UUK guidance¹ about information sharing and suicide prevention. All decisions about information sharing due to welfare concerns in the absence of consent will be made on a case-by-case basis, in accordance with the individual circumstances of each situation, in line with the process detailed in this policy.

1.2 Scope

This policy applies to all students enrolled on any University of Bath course, including remote and online courses, except for validated/licenced/franchised. In applying this policy to students aged under 18, staff should refer to the University's Designated Safeguarding Lead.

This policy applies to decision-making about information sharing at all levels of concern about student welfare, except for medical emergencies which are addressed specifically in section 3.4 of this document.

The University's position regarding routine sharing of student information, for example as required by law (e.g. with the Higher Education Statistics Agency) is addressed in the University's [Data Protection Statement for student registration \(bath.ac.uk\)](#), and is outside the scope of this policy.

2 Roles & Responsibilities

2.1 Students

- Students must provide information for a trusted contact when registering for their course. The trusted contact may be any individual who is aged over 18; it does not need to be the student's next of kin

¹ Information Sharing and Suicide Prevention Consensus Statement (DHSC, 2021); practitioner guidance from the Zero Suicide Alliance (2021); the 2022 draft NICE guidance on supporting people who self-harm and the [Information Commissioner's Office Code of Practice for organisations](https://www.universitiesuk.ac.uk/sites/default/files/uploads/Reports/uuk-papyrus-suicide-safer-universities-sharing-information.pdf) <https://www.universitiesuk.ac.uk/sites/default/files/uploads/Reports/uuk-papyrus-suicide-safer-universities-sharing-information.pdf>

- We recommend that students obtain the trusted contact's permission and make them aware they have been nominated, what the role of trusted contact entails, and that their contact details will be shared with the University
- It is essential that students keep their trusted contact details up to date. Students can review and update these details at any time by logging into SAMIS. Students are also required to provide details of their registered GP on SAMIS at registration. As with the trusted contact, it is essential that these details are kept up to date by the student and can be updated via SAMIS at any time
- Any student who is worried about another student's welfare should contact Student Support via visiting the Roper Student Support Centre, email (studentsupport@bath.ac.uk) or phone 01225 383838

2.2 Student Support & Safeguarding Teams

- Sensitive personal information about students shared with Student Support and Safeguarding is kept confidential within the service and is not routinely shared with other University departments and personnel (e.g. academic departments, Admissions or Registry)
- At first contact with any Student Support & Safeguarding team, students are informed of the Student Support & Safeguarding confidentiality policy and asked for consent to share information with other professionals, either within or external to the University, for the purposes of providing support. Where consent is given, the student may withdraw this at any time, although the agreement states that information may still be shared under exceptional circumstances as described in this policy

2.3 University Mental Health, Wellbeing & Therapeutic Practitioners

- Practitioner staff who hold professional registration with a regulatory body (e.g. the Nursing and Midwifery Council; Social Care England) are responsible for ensuring that their practice is in accordance with the standards of their professional registration at all times
- Where a student presents with difficulties relating to their mental health or social circumstances which may increase their vulnerability to harm, practitioners work proactively with the student to identify trusted individuals within their support network, and explore collaboratively how these resources might be mobilised to help support the student
- When consent to share information is given and it is deemed prudent to do so, staff ensure that this is shared with relevant parties in an effective and timely manner
- Where consent is not given or unable to be given, a risk assessment will be carried out to inform a decision about whether to contact a third party

2.4 Other University Staff

- Unless specifically governed by a departmental policy, there are no restrictions on the ability of university staff to share relevant information with other University departments for the purpose of providing welfare and wellbeing support to a student, for example if academic staff wish to raise concerns about student welfare with Student Support & Safeguarding
- Absolute confidentiality must never be promised by any University staff member relating to information disclosed to them by a student

- If any staff member becomes aware that a student may be at risk they should seek advice from a line manager and from Student Support & Safeguarding at the earliest opportunity by calling the Staff Advice Line on (internal) 4321
- If a staff member believes it may be necessary to share information with a student's trusted contact without a student's consent, Student Support & Safeguarding must be contacted as soon as possible to discuss their concerns
- In non-emergency circumstances where a staff member is asked by an external agency to provide information about a student (e.g. if information is requested by the police), staff should [refer the requesting party to the Data Protection team](#)

2.5 Receiving Information from Third Parties

- Whilst information must not be disclosed to third parties in the absence of student consent, unless in line with university policy, staff may receive information from third parties such as family members, friends, or external professionals, in relation to a student
- The receipt of such information can be essential where welfare concerns exist to allow staff to gather a fuller picture of the nature of any risks and inform appropriate responses and offers of support. If contacted by a third party, staff should explain that although we cannot normally share information without consent, the caller is welcome to share as much information as they deem appropriate and that this will be received and acted on appropriately

3 Information Sharing

3.1 Key Principles

- Students have the right for their sensitive personal information to be kept confidential unless there is reason to believe that doing so may create or exacerbate a risk of serious or lasting harm to themselves or another person. If a student or another party is believed to be at risk of serious or lasting harm, the university will take prompt action and will endeavour to explore all available avenues for supporting the student and reducing the identified risks
- Discussions about information sharing will be dynamic and ongoing throughout a student's support, maximising student autonomy whilst seeking to engage all possible resources in supporting a student who may be at risk of harm
- All decisions are made on a case-by-case basis, based wherever possible upon a robust and evidence-based assessment and considering the student's current and previously expressed wishes and other relevant contextual factors
- Where students do not wish to involve family members in their care, staff will seek to understand, in a compassionate and non-judgemental way, the reasons for this. The student's decision will be respected unless appropriately qualified and trained staff perceive that to do so would place them or another party at risk of serious harm. The student will be encouraged to consider alternative sources of support and to identify at least one supportive individual they might feel able to involve in their care

3.2 Information Sharing with Consent

- **With** the student’s consent, Student Support and Safeguarding staff will share information with external third parties (e.g. emergency/trusted contact(s); external professionals) in line with the student’s consent and wishes. This may include, for example, instances where one-off consent has been given to share specific information, or collaborative advance agreements where the student has given prior or ‘blanket’ consent for information to be shared with certain parties. Any such agreement will be regularly reviewed with the student and relevant parties informed. Consent can be withdrawn by a student at any time.

3.3 Information Sharing without Consent

- Where there are concerns for a student’s welfare, personal information may be shared with parties outside the University **in the absence of** a student’s consent only in exceptional circumstances (e.g. to prevent serious or lasting harm, or where required by law), following an appropriate risk assessment by qualified and trained Student Support & Safeguarding staff. In the absence of current consent, historical consent will not normally be relied upon in its entirety; however, details of previous consent discussions will inform the decision-making and risk assessment process
- In line with the DHSC’s Information Sharing and Suicide Prevention Consensus Statement (2021), information sharing for this purpose without consent be limited to that which is considered **necessary and proportionate to reduce the risk of serious harm**. Similarly, the university may need to share the details of a student’s trusted contact with an external agency where consent cannot be obtained, (e.g. in the event of a student being admitted to hospital, being identified as a missing person, or in the event of a student death). In such situations, the University will also notify the agency of the nature of the student’s relationship to the trusted contact, noting that this may differ from their next of kin or from the Nearest Relative as defined by the Mental Health Act
- In the event the University is considering sharing information due to welfare concerns in the absence of consent, this decision will include consideration of who is best placed to receive this information to mitigate the identified risk most effectively. As such, the decision may be made to contact a party other than, or in addition to, the trusted contact (e.g. the student’s GP or statutory mental health services)

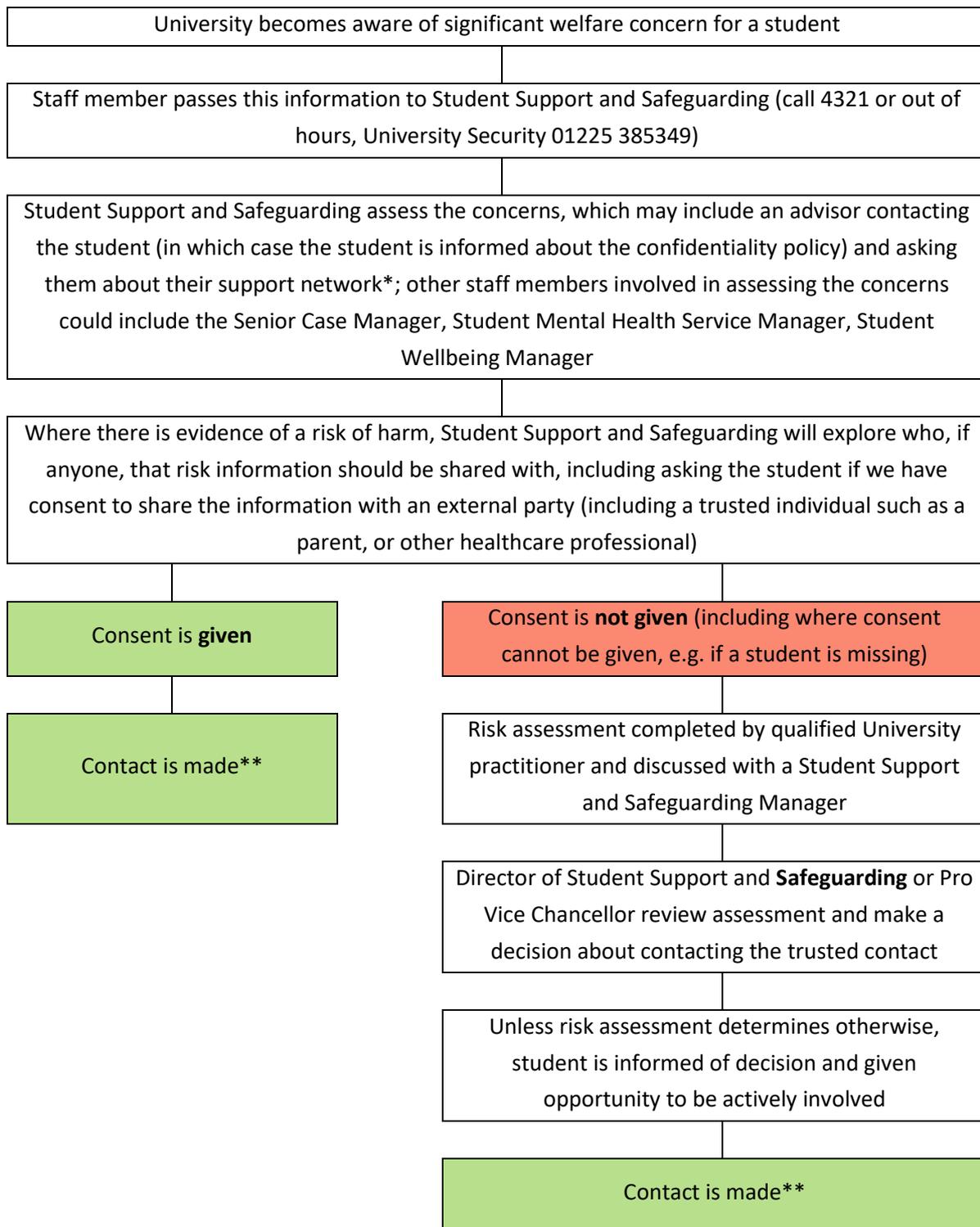
The final decision about sharing information in the absence of consent will be taken by either the Director of Student Support & Safeguarding, the Pro Vice-Chancellor for Student Experience, or nominated alternates, and clearly recorded.

In such circumstances where information is shared in the absence of a student’s consent, Student Support and Safeguarding staff will, wherever possible, make every effort to engage the student in a collaborative dialogue about how and when further information may be shared moving forward.

3.4 Information Sharing in Medical Emergencies

In situations such as medical emergencies, all staff may share information with relevant third parties (e.g. emergency services staff) where this is deemed necessary for the immediate preservation of the student’s vital interests. For example, if a student collapses and is unresponsive, staff must inform Campus Security and attending medical staff of a known medical condition.

3.5 Procedure



**In cases of immediate risk of serious injury or concerns arising out of hours (overnight), contact will normally be made immediately with the appropriate emergency service; the Student Support and Safeguarding On-call Manager may be contacted by Security in such instances*

***Normally the trusted contact will be contacted over telephone, with only the information they 'need to know' being shared, as well as inviting them to provide the university with additional information that might assist in the management of risk*

4 Safeguarding

Individuals do not retain the right to confidentiality when it is believed that a situation may pose an unacceptable risk of harm to others. Information may be shared without consent where this is considered to be in the public interest, i.e. where there is a risk of serious harm to either an identified individual(s), a group of people or a community. Examples of circumstances which may meet the definition of public interest include, but are not limited to:

- Where there is believed to be a risk of harm to a child (a person under the age of 18)
- Where a serious crime has occurred or is planned
- Contagion of infectious disease
- Risk of suicide where the suicide plan may involve a public location or public transport
- Risk of psychological harm or trauma in relation to others witnessing self-harm or suicide
- Where the student is on a professional practice course and their ability to practise safely and effectively may be compromised

Please see the [University Safeguarding Policy](#) for more information, including how to contact the University's Designated Safeguarding Lead.

5 Related Policies and Procedures

[regulations-for-students-2021-22-1-registration.pdf \(bath.ac.uk\)](#)

[regulations-for-students-2021-22-Appendix-2-fitness-to-study.pdf \(bath.ac.uk\)](#)

[Supporting students in distress \(bath.ac.uk\)](#)

[Responding to a report of a missing student \(bath.ac.uk\)](#)

[Responding to the death or serious injury of a student \(bath.ac.uk\)](#)

[Prevent policy \(bath.ac.uk\)](#)

[student-confidentiality-responding-to-calls-from-third-parties.pdf \(bath.ac.uk\)](#)

[Data Protection Guidance \(bath.ac.uk\)](#)

[university-of-bath-uk-gdpr-compliance-statement.pdf](#)

[admission-support-for-students-under18.pdf \(bath.ac.uk\)](#)

[University of Bath Safeguarding Policy](#)

[University of Bath Data Protection Statement for Student Registration](#)

6 Document Control Information

Owner	Student Support & Safeguarding
Version number	1
Approval Date	
Approved By	University Executive Board
Date of last review	October 2022
Date of next review	12 months from above