

University of Liverpool

Student Trusted Contacts Policy

Executive Summary	This Policy details the approach the University takes to recording the details of students' trusted contacts and how this information will be used. The term trusted contact replaces the term emergency contact recognising that there are a range of situations in which we may need to contact someone about a student's safety or wellbeing which may not constitute an emergency. The Policy sets out the requirements for using trusted contacts without a student's permission and confirms that this requires sign off by senior staff within Student Experience and Enhancement.		
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Responsible Department	Student Administration and Support, Director of Student Administration and Support		
Policy Author	Dr Paula Harrison, Paula.Harrison@liverpool.ac.uk		
Approval Route	Committee	Submission Date	Approved?
	Senior Leadership Team	30.5.3	Yes
	Education Committee	6.5.23	Yes
	Health and Safety Governance Committee	6.5.23	Yes
Linked Documents	Student Trusted Contact Statement		
Does this replace any previous policies?	This is a new Policy		
Consultation	Schools were consulted via the Heads of Education and Student Experience, Campus Support, Accommodation and Global Opportunities have also been consulted.		

Equality Impact Assessment	Completed and no equality impacts identified at this point although this will be kept under review.
Regulatory/ Compliance	The Policy complies with Universities UK good practice guidance and ensures compliance with GDPR.
Data Protection	The Policy provides clarity about how and when Trusted Contact information will be used. It also provides a clear governance route for decision making and oversight.
Communication	The updates will be included in Heads of Department emails. Student Services staff will attend Faculty Student Experience meetings to provide clarity and a news story will be used to highlight the importance of compliance with this Policy and referral routes available to staff as set out in When to Refer.

Quick Guide to the Student Trusted Contacts Policy

The following quick guide has been produced to direct staff to the relevant parts of the Policy. It is not a substitute for reading the whole document. If you are reading an electronic version of this document, press control and click on the section number to go directly to the relevant section.

- i) All students are required to provide details of at least one trusted contact to the University (this replaces emergency contact or next of kin details).
- ii) Staff should only contact a student's trusted contact with the student's explicit agreement. If a student does not or cannot provide consent then approval must be provided by two of the following: Director of Student Experience and Enhancement, Director of Student Administration and Support, Head of Student Services, Counselling and Wellbeing Service Manager or Mental Health and Disability Manager.
- iii) If a student is considered to be missing the appropriate protocol must be followed and advice sought from the Advice and Guidance Team Leader.
- iv) If there are concerns about the student and a staff member thinks the police should be informed they must discuss this with the Head of Student Services or Director of Student Administration and Support.

1. Background and Purpose

- 1.1. As part of our approach to support student safety and wellbeing, we require all our students to nominate and provide the University with details of at least one trusted contact as part of the annual registration process. We ask students to provide this information so that it is available in the unlikely event that a situation arises where we consider their health, wellbeing or welfare to be at risk. The University does not

require students to provide consent as part of the registration process. Consent to contact a trusted contact will be on a case-by-case basis in line with the Student Trusted Contact statement which all students are asked to read and acknowledge when completing registration.

- 1.2. Trusted contact details will be used rarely by the University. Wherever possible, the consent of the student will be sought prior to the University getting in touch with the trusted contact and sharing personal information, including sensitive information obtained in confidence. However, on occasion it may be necessary to share information in this way without the consent of the student where it is necessary to protect their vital interests or those of another person. This Policy applies to all students of the University.
- 1.3. Trusted contact details are held on the University's student record system, in accordance with the [University's Registered Students Privacy Notice](#). It is important that all students keep this mandatory information up to date and they can update it at any time by logging into My Liverpool.
- 1.4. The purpose of this procedure is to describe the process that must be followed where there is a requirement to contact a student's trusted contact.

2. Who is a Trusted Contact?

- 2.1. Students can choose who to name as a trusted contact. Usually their trusted contact will be a parent, family member or guardian. Most importantly, they must be in a position to be able and willing to act on the student's behalf in the event of a serious incident or emergency where we consider their health, wellbeing or welfare to be at risk. Students who are under 18 at the commencement of their programme must provide a trusted contact who complies with the University's requirements for [guardians for under 18s](#).
- 2.2. Students are asked to ensure that their trusted contact is:
 - aware that they have been nominated and that their contact details have been given to the University for this purpose;
 - readily contactable - wherever possible, students are asked to provide a mobile phone number as well as a landline so that contact can be made quickly;
 - if possible, able to speak English.

3. Responsibilities

- 3.1. All staff who have access to or become aware of sensitive information about a student have a responsibility to maintain the confidentiality and security of that data and to not share it with a third party, including a student's designated trusted

contact, unless absolutely necessary and having sought the necessary approvals as set out in section 5 below.

4. Sharing information with trusted contacts with student consent

- 4.1. Where a member of staff believes there is a requirement to share information with a student's trusted contact, consent should ordinarily be sought from the student before any further action is taken. Students should provide this consent in writing wherever possible, for example through an email from their University email account or by completing a confidentiality form. Staff should document that consent has been obtained for information sharing and confirm what information the student has consented to share. Where it is not possible to obtain written consent verbal consent can be sought and the reason for this should be documented and should be discussed with a member of Student Services staff.
- 4.2. Staff should not respond to enquiries from third parties about a student without the student's consent. This includes enquiries about whether or not an individual is a student at the University. Advice should be sought from the Head of Student Services or Director of Student Administration and Support before responding to any such enquiry.

5. Sharing information with trusted contacts without prior consent

- 5.1. If it is not possible for consent to be obtained from the student (e.g. because the student is incapacitated) or because consent is refused, or if there is concern that seeking consent from the student would increase risk to the student or others, then in very exceptional circumstances, the University may still proceed and make use of trusted contact details. This is likely to be when there are serious concerns for the student's health, wellbeing or welfare.
- 5.2. In order to satisfy data protection requirements, sharing in these circumstances must be in the vital interests of the student or another person.
- 5.3. The following are examples of circumstances in which we might get in touch with a student's trusted contact and share personal information, but each case is considered on its own merits. These examples include but are not limited to:
 - a student is exhibiting behaviour that may pose a serious risk to their safety and wellbeing or that of others;
 - a student has attended or been admitted to hospital in an emergency;
 - a student has suffered a serious physical injury, including significant self-harm;
 - a student ceases to engage with their studies and we have been unable to contact them to confirm their safety and wellbeing;
 - a student has not recently been seen in their accommodation, we have been unable to contact them and they are considered missing;
 - a student has an ongoing serious illness and they appear to be deteriorating;
 - a student is experiencing a mental health crisis;

- a third party has reported significant concerns about a student and we are not able to contact them to establish their safety and wellbeing.
- 5.4. Where the consent of the student has not been obtained, a decision to get in touch with the trusted contact will usually be taken by two of the following: Director of Student Experience and Enhancement, Director of Student Administration and Support, Head of Student Services, Counselling and Wellbeing Service Manager or Mental Health and Disability Manager informed, where required, by advice from the Data Protection Officer. If a decision is taken to share personal information without consent for a vital interests reason, the student should be informed of the decision, where they are contactable, unless it is determined that to do so would increase the risk of harm to the student or another person.
- 5.5. **If any other member of staff considers that there is a need to get in touch with a student's trusted contact (and the individual student has not given permission) they must, in the first instance, discuss the case with the Head of Student Services or Director of Student Administration. Out of hours they should contact the on call staff member for Student Services who are contactable 24 hours a day via Campus Support. The out of hours contact may try to contact another senior colleague to discuss the decision or may make the decision without further consultation documenting their reasons.**
- 5.6. In the event that there are concerns about the health, wellbeing or welfare of a student who is under 18 years old, the University will normally contact the student's parent or guardian. This must still be discussed with the Senior Student Services staff named above.

6. Record keeping

- 6.1. Where a decision is made to contact a trusted contact and share confidential information about a student, a record will be kept by those taking the decision and recorded on the Case Recording System, stating the justification for the decision, the nature of the information shared, with whom and the time and date of the disclosure.

7. Major incidents overseas

- 7.1. In the case of an ongoing large-scale emergency, the position on receiving no response from the student(s) would be to consult with the Head of Student Services or Director of Student Administration and Support before contacting their trusted contacts. For undergraduate students who are abroad this action would normally be undertaken by, or in conjunction with, the organisers of the time abroad for example the Global Opportunities Team or the Academic Department. Sharing information in these circumstances will satisfy data protection requirements.

8. In the event of a student's death

- 8.1. In the UK, it is always the responsibility of the police to contact the student's next of kin in the event of their death (see Guidance for staff responding to the death of a student). In accordance with data protection law, the University may provide the police with trusted contact details on receipt of the appropriate form from the

police, but would not normally be involved in the initial, direct contact with the next of kin.

- 8.2. In other countries, different protocols may exist. These protocols will need to be considered on a case-by-case basis. In the event of a student death, no action should be taken until the Head of Student Services or Director of Student Administration and Support has confirmed that the news is correct and next of kin have been informed.

9. Students considered as ‘missing’

- 9.1. From time to time students are reported as missing from the University and concerns are raised about their wellbeing. In such instances there may be:
- unusual or unexplained persistent absences from classes or lectures;
 - reports of non-attendance from placement supervisors;
 - non-response to important communications from the University;
 - non-response to attempts to make contact by fellow students;
 - absences from University of Liverpool or private residences noted by the Warden, Hall Manager and/or flatmates; and/or
 - concerns raised by people external to the University (family, friends, landlords).
- 9.2. In most cases it has been found that students who have been reported ‘missing’ have failed to notify (and gain permission from) their Department or School that they intend to be absent for a few days. Reasons for this may include:
- physical illness or being involved in an accident;
 - mental health problems, including persistent depression;
 - a quarrel with a partner, friend, flatmate or family member;
 - victimisation or undue pressure exerted by others (including family members);
 - being the victim of a crime; and/or
 - being arrested by the police or other law-enforcement agency.
- 9.3. Regardless of the reason, the University takes unreported absence very seriously and may, if appropriate, make use of trusted contacts to satisfy concerns about a student’s safety.
- 9.4. University staff that have concerns about a potential missing student, or who receive a report that a student is missing, must in the first instance contact the Advice and Guidance Team Leader.
- 9.5. When reporting a missing student staff must provide as much information as possible, for example:
- the name of the person who reported the missing student;
 - the date when the student was last seen;
 - whether there have been any previous concerns about the student’s behaviour or health;
 - whether there have been previous concerns raised about the student’s attendance or academic performance;

- details about the attempts made to establish contact with the student (dates and times of telephone calls and emails sent, etc.);
- details of any known social media activity by the student;
- names and contact details of staff involved; and/or
- the student's course details and University ID number.

9.6. The Advice and Guidance Team Leader will make a decision about the risk level that the situation presents, based on the potential vulnerability of the missing student¹. Where appropriate they will consult with the Counselling and Wellbeing Service Manager or the Head of Student Services. They will investigate:

- when the student was last recorded as being at the University and if applicable, in University accommodation;
- the student's attendance record;
- the student's academic performance;
- any previous history of contact with University support services;
- recent contact with the student's academic School or Faculty;
- taking additional actions such as gaining permission to access student email accounts, following the appropriate procedure, to check the date of recent email activity and investigating swipe card access records.

9.7. If considered appropriate, the Advice and Guidance Team Leader will ask a team member to seek to contact the student by telephone, SMS text and/or email. The Advice and Guidance Team Leader must be informed about any previous attempts to contact a missing student.

9.8. For undergraduate students on international placements, staff should consult with the Head of Student Services and/or Head of Global Opportunities.

9.9. Where a student does not respond to the efforts made to contact them, two of the following: Director of Student Experience and Enhancement, Director of Student Administration and Support, Head of Student Services, Counselling and Wellbeing Service Manager and Mental Health and Disability Manager, informed by advice from the Data Protection Officer, will consider whether it is appropriate to contact the trusted contact and/or to report the student as missing to the police.

10. Notifying the police

10.1. Liaison with the police will be managed by the Head of Student Services, or Director of Student Administration and Support or their delegates. Requests by the police for the personal details of students who they regard as missing should be dealt with by Director of Student Administration and Support or Head of Student

¹ Risk will not be assessed purely on the basis of the length of time a student has been missing. A student who has disappeared over a weekend with an overnight bag and no other problematic signs would not be seen immediately as being at risk. However, a student forgetting essential medication in bad weather with inappropriate clothing for as little as two hours may appropriately be identified as being at risk.

Services as a data protection enquiry. If the Head of Student Services or Director of Student Administration and Support make the decision to pass on responsibility for the investigation to the police, then they will normally inform the student's trusted contact prior to doing so, although there may be circumstances when this is not appropriate. If a student is found to have been harmed or is seriously ill, contact with next of kin is normally made by the police or hospital staff.

- 10.2. The Head of Student Services or Director of Student Administration and Support will keep senior University colleagues updated on developments as appropriate and in line with data protection and immigration legislation, and confidentiality obligations.

11. Out of hours contact

- 11.1. Where a situation arises out of normal working hours that requires the use of a student's trusted contact details this must be managed by Campus Support if a disclosure of information is required before the next working day. Where this relates to a police enquiry for contact details of students, including those of trusted contacts, trained Campus Support staff will release this information on a controlled basis. Where the situation is more complex or exceptional Campus Support will discuss with the Student Services out of hours contact. Campus Support will record the information which has been released and the reason for doing so and will inform Student Services as part of the incident report.

12. Managing information once a missing student is located

- 12.1. When a student considered to be missing is located, the student will be offered support by the University's support services to address any underlying difficulties. It may also be appropriate to remind the student of the University's Attendance Policy requirements.
- 12.2. If the student is an international student with a Tier 4 visa, they must be advised to speak to International Advice and Guidance as soon as possible as they may be in breach of their visa conditions.
- 12.3. Care must be taken in respect of disclosure of information, both within the University community, and in particular, to those external to the University. This includes those who are, or claim to be, close personal friends, or family members, recruitment agents, employers, landlords or even the police or other government employees. Information should only be shared if it is relevant to the situation.
- 12.4. Once a missing student has been located, the University will encourage the student to respond to concerned friends and family, if they are in a position to do so. If the University has previously informed the trusted contact that the student is missing and the student is unwilling or unable to contact their trusted contact, then the Head of Student Services or nominee will normally update the trusted contact.
- 12.5. If the student was reported as missing by staff outside of Student Services, Student Services staff will inform those staff that the student has been located and may provide other appropriate information. The Head of Student Services or

Director of Student Administration and Support will update senior colleagues as appropriate.

13. Consequences for non-compliance with this procedure

13.1. Staff must note that any breaches of this procedure, such as contact being made with a trusted contact or other person without the required permission, may be treated as misconduct under the University’s relevant disciplinary procedures and could lead to disciplinary action. Serious breaches of this procedure may constitute gross misconduct and lead to dismissal.

14. Monitoring compliance with this procedure

14.1. Heads of School, Directors or equivalent are accountable for ensuring that all staff within their area act in accordance with this Procedure.

14.2. Evidence of staff awareness of this procedure will be audited periodically.

14.3. The Director of Student Administration and Support will report on this Procedure annually to the Information Governance Committee (IGC), Wellbeing and Mental Health Board and Senior Leadership Team. A summary report will be provided comprising:

- the number of occasions where the decision was taken to release information to the trusted contact without the student’s consent and the key reasons for these decisions;
- the number of occasions where this Procedure has not been followed; and
- any lessons learned to improve the Procedure.

Contact Details

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Head of Student Services	Julia Purvis	Julia.Purvis@liverpool.ac.uk 07973247957
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