

Information Sharing with Student Emergency Contacts

Code of Practice

1. Providing the University with an Emergency Contact

As part of our approach to support student safety and wellbeing, we ask all students to nominate and provide the University with details of an Emergency Contact as part of the annual registration process. We will also ask students to check this information is up to date if they seek support from a University student support service. Emergency contact details are held on the University's student record system, and an explanation as to how the University processes that data is set out within the [University's Privacy Notice for Students](#).

We ask students to provide this information so that it is available in the unlikely event that a situation arises where we consider a student's health, safety or welfare is at risk.

Usually, an Emergency 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 a student's behalf in the event of a serious incident or emergency where we consider a student's health, wellbeing or welfare to be at risk. An Emergency Contact should be:

- aware that they have been nominated and that their contact details have been given to the University for this purpose
- readily contactable - wherever possible, please provide a mobile phone number as well as a landline so that contact can be made quickly

We understand that it is not always possible to provide the name of an Emergency Contact as every student's situation is different. In cases where students are not able to provide a contact, we may need to use a student's home address details in emergency situations when consent cannot be sought from the student (if available) (see section 2).

It is important that all students keep this information up to date. We will ask students to update their information annually through the enrolment process. It is a student's responsibility to ensure these details are kept up to date via the appropriate system (eVision).

2. Circumstances under which the University may use Emergency Contact details

Student information will be held securely and only shared where there is a lawful basis to do so. We will always balance these considerations with personal circumstances before contacting a third party, including an Emergency Contact. Further detail on how the University processes student information can be found in the [University's Privacy Notice for Students](#).

For most students, it is unlikely that we would ever need to contact an Emergency Contact. If we do need to make contact, we will seek to gain consent wherever possible, and we will work with students to gain consent when possible.

There may be circumstances, such as under Health and Safety and/or Safeguarding policies, where we may contact emergency services, or other external services, without consent where there is deemed to be an immediate threat to life or harm. Under current data protection legislation, personal information may be shared about a student without consent where we believe that this is necessary to protect vital (immediate) interests or those of another person and where it is not possible to obtain consent. This usually means that a student will have been involved in, or that there is a risk of, an incident or an emergency situation where we believe a student or others may come to serious or lasting harm.

The following table below provides a non-exhaustive list of examples of circumstances in which we might get in touch with an Emergency Contact without consent and share personal information, but each case is considered on its own merits.

Table 1. Examples of circumstances in which we may contact an Emergency Contact

Example	If consent provided	Process if there are concerns regarding lack of capacity and/or high levels of risk and no consent is provided
Exhibiting behaviour that may pose a serious risk to the safety and wellbeing to a student or others	Yes	Risk assessment via Regulation B1, or risk assessment via Student Services panel
Attended or been admitted to hospital in an emergency	Yes	In liaison with emergency services/NHS and/or via Student Services risk assessment panel
Suffered a serious physical injury, including significant self-harm	Yes	In liaison with emergency services/NHS and/or via Student Services risk assessment panel
Concern raised regarding lack of engagement with studies, and we have been unable to contact the student to confirm safety and wellbeing	Yes	Student Services risk assessment panel
Unable to contact a student within University accommodation and they are considered missing	Yes	Student Services risk assessment panel, or in liaison with the Police
An ongoing serious illness that appears to be deteriorating	Yes	Student Services risk assessment panel
Experiencing a mental health crisis	Yes	Student Services risk assessment panel
A third party has reported significant concerns regarding a student, and we are unable to contact the student to establish safety and wellbeing	Yes	Student Services risk assessment panel
Have been the victim of a serious crime	Yes	In liaison with emergency services/NHS and/or via Student Services risk assessment panel

3. How the University decides to contact an Emergency Contact

In the majority of cases, the decision to contact an Emergency Contact would be made in liaison with the student and a member of staff from Student Services. Any decision to get in touch with an Emergency Contact or to share personal information without a student’s consent would be taken by the Student Services Risk Assessment Panel and may be in consultation with Legal and Information Compliance Services (regarding Data Protection advice). We would inform a student in these circumstances, unless to do so would increase the risk of harm to a student or another person.

If a student does not provide consent for us to make contact, we will ensure this is appropriately recorded and make a risk-based decision regarding the circumstances and risk of harm. Whenever we share personal information about a student with their Emergency Contact, we will keep a record of the justification for this decision, the nature of the information shared, with whom, and the time and date of the disclosure.

There may be circumstances that are not considered an emergency, but where a student would like us to contact their Emergency Contact to help facilitate a decision around support for the student. We will ensure this is appropriately recorded and will not consider this as consent for future contact regarding other matters. Each contact with an Emergency Contact will require individual consent to be provided, so that boundaries regarding what information can be shared are clear.

The following table provides examples of when we would not ordinarily contact an Emergency contact, unless a student specifically asks us to and there is a need to support the student with this. It is important to be aware that these are examples and this is not an exhaustive list.

Table 2. Examples of situation in which the University would not make contact with an Emergency Contact

Missed teaching session
Missed assessment
Submission of Exceptional Circumstances
Academic Misconduct Offence
Student Discipline Offence
Support to Study level 1/2
Accessing a support service, e.g. Counselling
Accessing financial support

Please note that if concerns escalate (e.g. multiple missed teaching sessions and being unable to make contact with a student), we may then consider this as requiring action under section 2.

4. Process to contact an Emergency Contact.

Contact with an Emergency Contact will always be made by Student Services. Staff at the University should not share individual student information with a third party (within the scope of this Code of Practice), unless specifically advised to do so via Student Services, or if emergency services are required, even if consent by the student is granted. Any concerns regarding a student should be raised with Student Services who can be contacted via 01782 734481 or at

student.services@keele.ac.uk. If a member of staff becomes aware of an immediate risk to life, they should contact 999 immediately, then the Campus Safety team when appropriate.

If a situation arises outside of normal working hours, staff should contact the Campus Safety team on 01782 733999. Throughout term time, Student Services has Residence Life Managers who work on campus throughout the night-time and alongside our Resident Advisers and Campus Safety Team. Outside of term time, Student Services provides out of hours support through an on call rota. During this period, the Campus Safety team triage incidents accordingly and there is an escalation process for cases of serious concern. Staff supporting students and responding to incidents should refer to the University Incident Management and Business Continuity Protocol for more information regarding escalation protocol.

5. Roles and Responsibilities

The table below outlines roles and responsibilities across the university in relation to the Emergency Contact Code of Practice.

Table 3. Roles and Responsibilities

Role	Responsibility
Director of Student Services and Success, Head of Student Welfare, Head of Residence Life, Head of Student Accessibility and Inclusion	<ul style="list-style-type: none"> Oversee Code of Practice and implementation Decision making regarding contact with an Emergency Contact without consent via panel
Student Services Managers (including within Student Experience and Support, Residence Life, Counselling and Mental Health and Disability Support)	<ul style="list-style-type: none"> Ensuring Code of Practice is embedded within services Ensure accurate record keeping Responding to escalated concerns regarding a student Making contact with an Emergency Contact in serious situations (via panel)
Staff in specialist roles (e.g., Mental Health Advisers, Health and Safety, Legal and Information Compliance, Counsellors)	<ul style="list-style-type: none"> Support decision making by providing specialist advice/risk assessment-based advice
Student Experience and Support Officers, Counsellors, Mental Health Advisers, Disability Advisors. Financial Support Team	<ul style="list-style-type: none"> Work with students to ensure accurate records are kept regarding student interactions Referral/escalate concerns regarding a student Make contact with an emergency contact if advised to do so/only with student consent.
Campus Safety	<ul style="list-style-type: none"> Respond to any urgent student concerns when appropriate Refer student welfare concerns to Student Services Work in conjunction with Student Services on a 24/7 basis to assess risk and ensure student safety, referring to emergency services when required.
All other staff (Professional Services, Academic and Operational)	<ul style="list-style-type: none"> Refer concerns regarding individual students to Student Services Work with Student Services to best support students

Students	<ul style="list-style-type: none"> • Keep their contact details and Emergency contact details up to date • To seek support (internally or externally) when required and if able to do so
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6. RELATED POLICIES AND PROCEDURES

Other policies that should be read in conjunction with this Code of Practice include:

- University Privacy Notice for Students
- University Incident and Business Continuity Management Policy
- University Safeguarding Policy
- Support to Study Code of Practice
- Academic Mentoring Code of Practice
- Student Attendance and Engagement Policy
- Attendance Monitoring Policy
- Data Protection Policy
- Records Management Policy
- Health and Conduct
- Fitness to Study
- Accidents, Dangerous Occurrences and Diseases Code of Practice

7. DOCUMENT CONTROL INFORMATION

Document Name	Information Sharing Code of Practice
Owner	Director of Student Support and Success
Version Number	1.1
Equality Analysis Form Submission Date	06/09/2023
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Approved By	University Executive Committee
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Date of Last Review	12 December 2023
Date for Next Review	12 December 2025
Related University Policy Documents	See Section 6
<i>For Office Use – Keywords for search function</i>	

