

## Student Emergency Contact Policy and Procedure

### 1. Introduction

1.1 As a higher education institution, Imperial College London (“the College”) has a duty of care to all members of its community, which includes the responsibility to act reasonably to protect the health and safety of all its students and staff. Our duty of care must be finely balanced with our obligations under General Data Protection Regulation (GDPR) and other relevant legislation.

1.2 The College 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 or legal guardians (unless the student is a minor). Advice on the requirements and relevant exemptions on this can be sought from the College’s Data Protection officer.

1.3 The College collects ‘emergency contact details’ for its students which are held securely and confidentially. These may only be accessed under specific conditions as outlined in relevant UK legislation and this policy and procedure.

1.4 This policy 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 been given. The member of staff should ensure that they keep records in an appropriate secure manner for later reference, in line with the College retention requirements.

1.5 The College supports the aims of the [Information Sharing and Suicide Prevention Consensus Statement](#) coordinated by the Department of Health to improve information and support for families who are concerned about a relative who may be at risk of suicide. This policy and procedure forms part of the College’s commitment to this statement.

1.6 Additional guidance will be provided to all staff with regards to the implementation and ongoing use of this procedure, including specific detailed guidance for those staff members in roles that are part of the escalation and decision-making process.

1.7 This policy and procedure applies to the usual day-to-day study or living arrangements for students at College premises. Where students are required to study away from the College, 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 College procedures and in line with requirements of the hosting institution. Where there is concern raised about a student away from the College, advice can be sought from the Director of Student Services (or nominee) of the appropriate procedures to apply or by reviewing the information available on the [placements webpages](#).

1.8 During a referral under the Fitness to Study procedure if it is considered appropriate to also contact the student’s emergency contact, this policy will be followed.

## 2. Circumstances when the College may use emergency contact details

2.1 There are two types of instances in which the College may use the emergency contact details on the student record. These are:

- 1) in a student's 'vital interest' (life or death situations), or
- 2) where the College has a serious concern for their wellbeing.

2.2 **Vital interest:** Vital interest is a legal definition which relates to taking action where it is necessary to protect someone's life or that of another person. Under 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 emergency contact details, to a third party such as a member of the emergency services in the event of an accident or emergency medical admission. The College may also decide to contact a student's named emergency 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 College or NHS support services.

2.3 **Serious concerns:** A serious concern about a student under this policy means where a member of the College believes on the basis of the information available to them that a student is close to a crisis situation in their mental or physical health, or they have fears for the student's safety that do not meet the 'vital interest' criteria.

2.4 The following are examples of circumstances that are considered a serious concern. If a member of staff is concerned about a student and is unsure if this policy would apply additional guidance is available from the Director or Deputy Director of Student Services or a Senior Faculty Tutor. These examples are provided to give a benchmark of the seriousness of a concern that falls under this policy and is not exhaustive:

- A student has attended or been admitted to hospital for non-routine treatment.
- 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 [Missing Student Policy](#).
- A student has not recently been seen in their hall of residence and we have been unable to contact them, in line with the [Missing Student Policy](#).
- A student has an ongoing illness and they appear to be significantly deteriorating.
- A student appears to be approaching a significant mental health crisis.

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

## 3. Providing emergency contact details to the College

3.1 All students are required to provide details of an emergency contact through the registration and enrolment processes in each year of their programme. This information is held on the

University's student record system, in accordance with the College's [Privacy Notice for Students and Prospective Students](#) and current UK data protection legislation.

3.2 This is a mandatory requirement to ensure that if it is in the vital interest of the student, the information can be provided to the emergency services.

3.3 In addition to the mandatory requirement to provide these details, at the same time the College will request advance consent from the student to use emergency contact details where there is serious concern regarding their wellbeing.

3.4 Students should nominate a responsible adult of their choice to be their emergency contact. We expect that for the majority of our students, the emergency contact will be a parent, legal guardian or spouse but it does not have to be. When a student is considering who they wish to nominate they need to consider how the person that they nominate would be able to provide them support in the event of an emergency, or where serious concerns are raised about their wellbeing.

3.5 Students should ensure that the person that they have nominated as their emergency contact understands that this is the case and what this is for, has given their permission to be an emergency contact, and that their contact details will be given to the College. Wherever possible, students should give multiple contact methods (a mobile phone number as well as a landline) so that contact can be made quickly.

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 [My Imperial](#). The College 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 a student does not consider that they can provide details of an emergency contact for whatever reason they should raise this is the first instance with their Department Senior Tutor.

3.8 Students will be informed why the College requires their emergency contact details and requests advance permission to use these if a serious concern is raised. This will include the importance of maintaining the accuracy of the information when updating their details at registration and enrolment.

#### **Withdrawing consent for details to be used in a period of serious concern**

3.9 Students are free to withdraw their consent at any time for an emergency contact details to be used for **serious concerns**.

3.10 To withdraw their consent, students must log onto [My Imperial](#) and 'deselect' the advance consent option against their record.

3.11 A student cannot withdraw their consent for the College to use emergency contact details if we consider it in the student's vital interest (life or death situations).

#### **4. Considering using emergency contact details**

4.1 Every student is an individual and their personal circumstances at the time will be taken into consideration before using the emergency contact details provided. The professional judgement of our wellbeing staff will be used in deciding whether to alert the emergency contact to a wellbeing

concern. Wellbeing staff at the College include Faculty Senior Tutors, Senior Tutors, Wellbeing Advisors, and the Hall Wardens as part of their specific roles and 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 emergency 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 or Faculty Senior Tutor as appropriate, who will then contact Student Services to arrange a case conference.

4.3 The decision to contact a student's named emergency contact will be made jointly by the relevant Faculty Senior Tutor, Academic Registrar and Director of Student Services (or their nominees). This group will arrange a case discussion at which they will consider the professional views of other College wellbeing staff, for example the student's Departmental Senior Tutor and the Hall Warden, 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, the decision can be taken by two of the three parties if their views are unanimous. Cases may also be referred to the College Secretary 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 emergency contact. This will normally be the Departmental Senior Tutor, Faculty Senior Tutor or the Director/Deputy Director of Student Services.

4.6 The College would normally tell the student that we intend to notify their emergency contact unless it is not possible for us to do so, or to do so would cause a situation critical delay.

## 5. Out of hours

5.1 Where a member of staff needs advice in relation to matters referred to in this policy as 'out of hours' (5pm to 9am Monday to Friday, at weekends and during College Closure) they should contact the College's Security Team who will be able to provide support and guidance. In a vital interest situation, the Security team are authorised to provide a student's emergency contact details directly to the emergency services. Further details of emergency protocols are available on the [College website](#).

## 6. Death of a student

6.1 In the event of a suspected or confirmed death of a student, in line with the College's [Student Death Protocol](#), the College will pass the emergency contact details to the emergency services to support them in their role of contacting next of kin. It is not the role of the College to do this.

6.2 The Student Death Protocol outlines the actions the College will take where a death has occurred, including how the College will support the family of the deceased during this time, which falls outside of this procedure.

## **7. Record keeping**

7.1 A central record will be kept by the Director of Student Services (or their nominee) of all instances in which a case discussion is held about a student. This is so that there is an accurate record of all instances under this policy in which emergency 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.

7.4 The College may use anonymised data for internal reporting purposes in order to support the wellbeing of students. No individual will be able to be identified in such reports.