

Information Sharing Principles

These have been developed following the Suicide
Safer Universities Guidance

September 2025

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1. Identifying Trusted Contacts

- A trusted contact is somebody that the student is comfortable with being contacted if they are experiencing a mental health crisis or there are serious concerns about their safety or mental health. The trusted contact should not be another student at the Centre, must be at least over 18 years of age, and they must be able to understand English.
- Trusted contacts do not replace emergency contacts or the parents or education guardians of 17-year-olds, for accidents, serious illness, arrests or other emergency situations.
- Where there is a risk to life, both the trusted and emergency contact and parents (if different) may be contacted following this guidance.

During Welcome Week we need to explain what a trusted contact is which can be the same as the emergency contacts provided or someone else. If different, students should tell us about their relationship with the trusted contact and provide their contact details.

Encourage all students to opt-in on the Student Support Form so that they give consent to share information in their vital interest (matter of life and death) or serious concern of wellbeing.

Remind students to ask the trusted contact that they are happy to act in this capacity.

Tell students upfront when we may reach out to a trusted contact and why ie “in their vital interests”.

When a student comes for support, use it as an opportunity to check if the trusted contact has changed any details.

Always encourage the student to talk to their trusted contact about any issues impacting their health and wellbeing.

Always try to gain the consent of the student to share information and agreement on what details are shared (if any) prior to contacting the trusted contact.

Record occasions when consent was given and any limitations on CPOMS – it will help make decisions in an emergency.

Trusted contact information should be recorded on the Student Information System.

2. When Can Trusted Contacts be Contacted

General Data Protection Regulation (GDPR) allows sensitive information about a student to be shared if there is a concern the student is at risk of serious harm and in their vital interest i.e. to prevent loss of life or serious physical, emotional or mental harm because of a mental health crisis.

Making a decision to share information:

2.1. Risk Assess this by Considering

- History of trauma and other information to build a broader picture of the student's situation;

- Whether it would impact on future engagement and trust with the Centre and trusted contact and whether they have previously given consent;
- How likely the trusted contact is willing and, in a position, to support e.g. their relationship, location, time difference.

2.2. Does it Fit the Defense to Breach Confidentiality

- Student lacks capacity at that moment in time to understand their vital interests and keep themselves safe;
- Sharing the information is in the public interest to keep others safe.

2.3. Who Can Do This

Designated Safeguarding Lead/Deputy (DSL/DDSL) or delegate.

Anyone else must escalate immediately to DSL or DDSL as an urgent safeguarding concern.

Examples of when they can do this (note this list is non-exhaustive):

- Admitted to hospital – accident or non-routine procedure;
- Serious physical injury – includes serious self-harm;
- Not been seen or been able to contact them as per the *Student Whereabouts Procedure*;
- Experiencing a mental health crisis;
- Long term illness or condition which is deteriorating.

2.4. Recording Information Sharing Decisions

- What was shared;
- Who shared it;
- Who with;
- The rationale.

3. Ongoing Inclusion of Trusted Contacts

Students should be consulted about how they wish their trusted contacts to be involved following an event.

4. Sharing Information with Emergency Contacts / Parents

GDPR allows information to be shared with emergency contacts / parents in times when it would prevent physical harm or loss of life, protect the public, safeguard a child or vulnerable adult (legal definition), or in response to an emergency, such as an accident, civil unrest.

The information shared must only be what is essential and factual. It should not provide details of potentially sensitive information such as health.

5. Data Sharing Agreements with 3rd Party Providers

This will be dependent on individual partner university contracts.

Sharing of information, if it is in a student's vital interests, is written into generic contracts with accommodation providers, *Bright World*, and *Howden Student Assistance Programme*. Individual Centres can contact providers about individual students as appropriate.

6. General Information Sharing Principles

Where students are 17 years old, for safeguarding reasons we have a legitimate reason to share information on attendance, academic performance, terminations and Fitness to Study processes, but personal details would not be shared about terminations and Fitness to Study.

Where a 17-year-old student's study plan has been terminated, parents must be informed in writing.

Where students are aged 18 or over, we cannot share personal data with third parties (including parents) unless:

- We have the student's explicit consent; or
- There is another lawful basis under UK GDPR;
- It's a safeguarding issue as Section 2 above.

Consent must be:

- Freely given, specific, informed and unambiguous;
- Documented appropriately; and
- Capable of being withdrawn at any time.

6.1. Sharing of Attendance and Academic Performance

Sharing of attendance and academic performance data with parents, agents and sponsors (only where this is necessary and proportionate to support student welfare or performance) is allowed under Article 6(1)(f) of UK GDPR.

- All agents have a contract with us containing appropriate data protection clauses;
- All students have been made aware, via privacy notices, that their data may be shared in this way with agents, sponsors or parents.

6.2. Sharing of Other Information

Specific, case-by-case consent should be obtained where we wish to share more detailed or sensitive information with a named third party, including sponsors.

If there is doubt on whether data can be shared with agents, parents or other third parties, contact privacy@studygroup.com mailbox, or with sponsors contact Central Sponsor Team.



Title	Information Sharing Principles
Version	1.1
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