



QAHE Limited Trusted Contact Policy

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1. Introduction

As part of our ongoing commitment to student wellbeing and safety, QAHE Limited (“QA Higer Education”) has established a Trusted Contact Policy. This policy allows students to designate a Trusted Contact Person, an individual QA Higer Education may reach out to in certain circumstances when there are serious concerns about the student’s health, safety, or wellbeing.

The Trusted Contact is not granted access to the student’s academic records or other confidential information, nor do they have decision-making authority. Instead, this person serves as an additional point of contact if QA Higer Education believes the student is in distress or may be at risk, and efforts to reach the student directly have not been successful or are deemed insufficient given the nature of the concern.

This policy reflects our proactive approach to student support and aligns with our mission to foster a safe, supportive, and responsive campus environment. It also complements existing protocols related to emergency response, mental health support, and student conduct.

2. Policy Ownership

The Trusted Contact Policy is owned and maintained by the Safeguarding Student Life and Wellbeing Services in collaboration with the Registry and Enrolment Teams. These offices are responsible for ensuring the policy remains current, complies with applicable laws and university regulations, and reflects best practices in student support and safety.

The Safeguarding, Student Life and Wellbeing Services are responsible for monitoring the implementation of the Trusted Contact Policy and ensuring compliance with university standards and applicable laws, including the UK General Data Protection Regulation (UK GDPR), the Data Protection Act 2018, and guidance from the Information Commissioner’s Office (ICO). In rare circumstances, when a student’s health, safety, or wellbeing is at serious risk, QA Higer Education may contact the Trusted Contact Person (TCP) without the student’s consent under the vital interests or safeguarding exceptions, consistent with UK GDPR / DPA 2018 and ICO guidance.

Revisions to this policy will be made as needed to address changes in university procedures, legal requirements, or emerging concerns related to student health, safety, and privacy.

3. Scope

This policy applies to all undergraduate, graduate, and postgraduate students enrolled at QA Higer Education. It also applies to staff and faculty who may be involved in student support, safety, and emergency response.

4. Definitions



- **Trusted Contact Person (TCP):** An individual identified by the student (such as a parent, guardian, relative, or close friend) whom QA Higer Education may contact in limited circumstances.
- **Emergency:** A situation in which QA Higer Education has a reasonable belief that a student's health, safety, or wellbeing is at serious and imminent risk.
- **Confidential Information:** Personal information protected under applicable privacy laws (e.g., GDPR).

5. Policy Statement

- Students are encouraged, though not required, to designate a Trusted Contact Person upon enrolment or at any point during their studies.
- A TCP designation is voluntary and can be updated or withdrawn by the student at any time through QA Higer Education's student information system. There can also be more than one TCP depending on the circumstances in which they may be contacted.
- The student must obtain the consent of the individual nominated as TCP to act in this capacity.
- QA Higer Education will only contact a TCP in rare and specific circumstances, such as:
 - When QA Higer Education reasonably believes a student poses a risk to themselves or others.
 - When a student is unresponsive, missing, or hospitalised.
 - When required by law or in compliance with an official investigation.
- Contacting a TCP does not replace notifying emergency services (e.g., police, ambulance) when appropriate.

6. Responsibilities

6.1. Student Responsibilities

- Provide accurate and current information for their TCP.
- Update TCP information as needed.
- Understand that designating a TCP does not grant the TCP general access to academic or health records.

6.2. QA Higher Education Responsibilities

- Maintain TCP information securely and separately from academic records.
- Limit access to TCP information to authorised personnel only.
- Notify the student, whenever possible, before contacting the TCP, unless doing so would increase risk.
- Ensure all communication with a TCP is limited to the information necessary to address the concern at hand.

7. Related Policies and Procedures

- Data Protection Policy
- Safeguarding Policy
- Student Code of Conduct
- Equality, Diversity and Inclusion Policy



8. Implementation Procedures

The following procedures outline how the Trusted Contact Policy will be implemented and maintained at QA Higer Education:

8.1. Designation of a Trusted Contact

- All students will be given the opportunity to designate a Trusted Contact Person during initial enrolment, registration, or through the student portal at any time.
- Students may choose any adult (e.g., parent, guardian, relative, mentor, or close family friend) as their Trusted Contact.
- Designating a Trusted Contact is voluntary, but strongly encouraged, particularly for students living away from home, international students, or those receiving health or mental health services.
- Students may update or revoke their Trusted Contact information at any time via the student information system or by submitting a written request to the Registry Team.

8.2. 2. Storage and Confidentiality

- Trusted Contact information will be securely stored within QA Higer Education Student Records System, Salesforce, and accessible only to authorised QA Higer Education personnel with a legitimate educational or safety-related interest.
- The Trusted Contact will not be given access to student records and will not have authority over academic, financial, or housing matters unless separately authorised by the student through other university processes.

8.3. Use of Trusted Contact Information

QA Higer Education personnel may contact the designated Trusted Contact Person only under specific circumstances, including but not limited to:

- Concerns about the student's physical or mental health, especially if the student is unresponsive or unreachable.
- Observations or reports of behaviours suggesting the student may be in distress, at risk of self-harm, or experiencing a crisis.
- Situations involving hospitalisation, medical emergencies, or other serious incidents where the university deems it necessary to involve a supportive adult.
- When there are concerns about potential harm to others, or the safety of the campus community, and the Trusted Contact may assist in outreach or resolution.

The decision to contact a Trusted Contact will be made on a case-by-case basis, guided by professional judgment and in accordance with applicable privacy laws.

8.4. Staff Training and Awareness

- Relevant QA Higher Education staff, including those in student facing, and campus safety roles, will receive periodic training on the Trusted Contact Policy and its procedures.

Staff will be instructed on when and how to use Trusted Contact information appropriately and ethically.



9. Monitoring and Compliance

The Safeguarding, Student Life and Wellbeing Services are responsible for monitoring the implementation of the Trusted Contact Policy and ensuring compliance with university standards and applicable laws, including the UK General Data Protection Regulation (UK GDPR), the Data Protection Act 2018, and guidance from the Information Commissioner’s Office (ICO).

9.1. Monitoring

Periodic reviews will be conducted in collaboration with the Registry Team to ensure:

- Trusted Contact information is accurate, securely stored, and accessed only by authorised staff.
- Use of Trusted Contact information is appropriate and documented.

9.2. Compliance

All staff must follow QA Higher Education privacy policies and legal requirements when handling Trusted Contact information.

Misuse or unauthorised access may result in disciplinary action.

10. Equality Impact Assessment

10.1. Purpose of the Policy

The Trusted Contact Policy allows students to voluntarily designate a trusted individual who the university may contact in limited circumstances related to student well-being, safety, or emergency situations.

10.2. Aims of the Assessment

To ensure the policy is fair, inclusive, and does not negatively impact any group protected under the Equality Act 2010 (or equivalent legislation), including age, disability, gender, race, religion or belief, sexual orientation, and gender reassignment.

10.3. Assessment of Impact

Protected Characteristic	Potential Impact	Risk	Action to Reduce Risk / Improve Impact
Age	Different understanding by older or younger students/staff.	Some groups may feel excluded or misunderstood.	Use clear, simple language; ensure all age groups are informed.



Disability	Harder for people with disabilities to understand or use policy.	Could be excluded if info isn't accessible.	Provide info in accessible formats (large print, easy-read); train staff.
Race / Ethnicity	Language/cultural differences affect understanding or trust.	May avoid policy due to language or cultural concerns.	Offer materials in multiple languages; cultural awareness training for staff.
Sex / Gender	Gender assumptions affect who is offered/trusts contact chosen.	People might be pressured or excluded based on gender.	Ensure policy is offered equally; avoid gender assumptions.
Gender Reassignment	Privacy or discrimination concerns for transgender people.	Hesitance to nominate a trusted contact.	Respect confidentiality; promote an inclusive environment.
Sexual Orientation	LGBTQ+ individuals may fear bias or discrimination.	Reduced uptake due to fear of discrimination.	Clearly state inclusivity of all relationships.
Religion or Belief	Religious/cultural beliefs influence trusted contact choice.	Discomfort nominating outside cultural group.	Allow flexibility; respect cultural differences.
Pregnancy and Maternity	Pregnant individuals may need extra support.	Needs might be overlooked.	Raise awareness; explain how policy can help.
Marriage and Civil Partnership	May not want to nominate spouse/partner.	Assuming partner is default contact may breach privacy.	Make nominations voluntary and flexible.
Socioeconomic Status	Less access to info may reduce awareness.	Some may be excluded due to communication methods.	Use simple language; provide info in various formats; avoid online-on

10.4. Monitoring and Review

The policy will be reviewed annually. Any concerns or patterns relating to equality or discrimination will be addressed as part of that review.

10.5. Conclusion

No significant adverse impacts were identified. The policy is designed to support all students equally and includes appropriate measures to ensure accessibility and inclusion.



11. Data Protection

All personal data collected and used under this policy will be handled in accordance with applicable data protection laws, including the UK General Data Protection Regulation (UK GDPR) and the Data Protection Act 2018. Trusted contact information will be stored securely and accessed only by authorised staff when there is a serious concern for a student's wellbeing or safety. The University will ensure that any disclosure to a trusted contact is necessary, proportionate, and in the vital interests of the student. Students have the right to access, update, or withdraw their trusted contact information at any time.

12. Further Information

For queries, please contact the Head of Safeguarding and Student Wellbeing: qahe.welfare@qa.com / 0203 921 0163

13. Review

The Trusted Contact Policy will be reviewed annually by the Student Life and Wellbeing Services in consultation with the Registry and Enrolment Teams.

Updates or changes to the policy will be communicated to students via official university communication channels, and updates will be reflected in the student handbook and university website.

