

STUDENT EMERGENCY CONTACT POLICY

Version 2, May 2025

Royal Conservatoire of Scotland

Student Emergency Contact Policy

1. Introduction

As a higher education institution, the Royal Conservatoire of Scotland (RCS) 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 to process student data in line with data protection legislation. This includes the 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 under the age of 13).

2. Purpose

This procedure outlines how student emergency contact details are collected and updated, the circumstances under which RCS will use emergency contact details, how that decision is made, and who will be authorised to make contact. The purpose is to provide clarity to students, staff and emergency contacts, and to ensure that appropriately informed and timely action is taken in emergency circumstances and in situations in which serious concerns are raised regarding student wellbeing.

In line with emerging best practice and the prioritisation of student wellbeing, this procedure outlines our intention to offer every student the opportunity to give permission for a named and trusted person and/or Doctor to be contacted, in situations which are not 'life or death', but where there are serious concerns about the student's physical or mental health or wellbeing. Where permission is given, this will allow us to make an informed choice to initiate that contact, in exceptional circumstances, including where it is not possible to gain the student's consent at the time of the incident(s) or concern(s). This is in addition to our legal right to use the contact information without prior consent where it is in the student's vital ('life or death') interest to do so.

The following circumstance is not covered by this policy:

If a student directly requests a staff member to contact someone on their behalf (eg. a relative, or guardian or Doctor) on a particular issue, then in that instance, direct consent will have been given in the moment. Staff will keep a record of this request in an appropriate secure manner for later reference, and in line with the RCS record retention requirements.

The policy that is covered in this document applies to circumstances where opt-in consent has been supplied by the student and the institution deems it necessary to make contact with the nominated emergency contact and/or Doctor due to serious concerns for a student's wellbeing.

3. Circumstances when RCS may use emergency contact details

Emergency contacts are not given any information about academic progress or any other aspect of the student's life at the Conservatoire. Those nominated will only normally be contacted when there is a significant concern about the student's physical or mental health, wellbeing or safety.

There are two types of situation in which RCS may use a student's Emergency Contact Details:

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

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 Conservatoire 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 mental health crisis and was not engaging with the RCS or NHS support services.

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

The following are examples of circumstances that are considered a serious concern.

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 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.
- A student has an ongoing illness and they appear to be significantly deteriorating.
- A student appears to be approaching a significant mental health crisis.
- Serious physical or mental illness, or concerns about behaviour which might mean that someone is seriously unwell.

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

4. Providing emergency contact details to RCS

All students are required to provide details of an emergency contact through the matriculation processes in each year of their programme. This information is held securely on the RCS student record system, in accordance with the RCS Student Privacy Notice and current UK data protection legislation.

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. These details may only be accessed under specific conditions as outlined in relevant UK legislation and this policy and procedure.

At the same time RCS will request advance consent from the student to use emergency contact details where there is serious concern regarding their wellbeing (opt-in consent).

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.

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 RCS. Wherever possible, students should give multiple contact methods (a mobile phone number as well as a landline) so that contact can be made quickly.

Students are asked to keep these details up to date, and may change these and other personal details at any time by contacting aas@rcs.ac.uk. RCS 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.

5. Withdrawing consent for details to be used in a period of serious concern

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

To withdraw their consent, students must contact aas@rcs.ac.uk.

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

6. Considering using emergency contact details in circumstances that raise 'serious concern'

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 staff will be used in deciding whether to alert the emergency contact to a matter of serious concern.

The emergency contact details are for use in exceptional circumstances, as set out above. In such circumstances, the decision to use the emergency contact details during working hours will normally be made jointly by the School Director, Deputy Principal & Head of AAS (or their nominee). This group will arrange a case discussion at which they will consider the consent status of the student (whether they have opted-in) and the professional views of other RCS staff as appropriate (i.e. lecturers, counselling and wellbeing staff).

Where it is not possible for all three decision makers (or their nominees) to convene a case discussion within 24hrs 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 Director of HR in the absence of a third decision maker or where additional guidance would be beneficial.

In the discussion, agreement will be reached about who will contact a student's emergency contact. This will normally be the Head of Department/ Head of AAS (or their nominee).

If any member of staff considers that the student's emergency contact needs to be contacted because of a serious concern, they should discuss the case in the first

instance with their Head of Department as appropriate. The Head of Department should then escalate the case to the School Director/Deputy Principal/Head of AAS (or their nominee). RCS 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.

7. Record keeping

A central record will be kept by the Head of AAS (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.

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.

The record will be held securely and confidentially in line with the relevant retention requirements.

The RCS 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.

8. Information for Parents & Supporters

We understand that sometimes parents may want to contact the student but be unable to do so. We recognise our HE students as independent adults. Therefore we need their consent to talk to anyone outside the Conservatoire about them, including parents and guardians.

That is why we ask HE students (aged 18+) to opt in and give consent for us to contact a designated parent, guardian or friend in situations that are not emergencies, but in which we have serious concerns about their welfare.

Under data protection legislation, we may disclose personal information about a student without their consent only when it is in their vital interests to do so; this means in very serious or life and death situations.

9. What we are able to tell you

We cannot confirm to a third party including parents or guardians if someone is a student at RCS, or their whereabouts. But we will follow up on any concerns raised.

We require all students to provide the details of an emergency contact when they register for their programme of study. This may be a parent, guardian or other responsible individual.

We will use emergency contact details in very serious situations when it's in the student's vital interests that we do so (see above).

10. If a student chooses to opt-in

We also ask students to opt-in and give consent for us to contact a designated parent, guardian or supporter in situations that are not emergencies, but where we have serious concerns about their wellbeing.

11. If a student does not opt-in

If a student does not opt-in, or leaves the option blank, RCS does not have consent to contact emergency contacts in the event of any serious concerns. RCS can ask for opt-in consent directly at any point and will record that action. However, regardless of

whether a student has opted-in, RCS can contact their emergency contact in the event of a vital interest emergency.

12. The Opt-In

All students will be asked to opt-in each year at matriculation. The opt-in is as follows:

If we have serious concerns about your wellbeing, we would like contact a designated parent, guardian or supporter, but we need your consent to do so.

Please opt-in by choosing an option below. If you leave this blank, that means we do not have your consent, and we can't contact anyone on your behalf.

☐ **I consent** to my emergency contact being contacted if RCS have serious concerns about my health & wellbeing

☐ **I do not consent** to my emergency contact being contacted if RCS have serious concerns about my health & wellbeing

☐ I consent to my General Practitioner (Doctor) being contacted if RCS have serious concerns about my health & wellbeing

☐ I do not consent to my General Practitioner (Doctor) being contacted if RCS have serious concerns about my health & wellbeing

We take your privacy very seriously. Please find a copy of our Privacy Notice at https://www.rcs.ac.uk/policy/privacy/

You can opt out at any point, or change your designated contact by contacting aas@rcs.ac.uk

13. BSL Translation of Student Emergency Contact Policy and Procedure

Please click on the links below to view the BSL translation:

1. **Induction**
    - **https://youtu.be/DG7Im_vUocc**
    - **https://youtu.be/irlNrHR6Qx8**
2. **Purpose**
    - **https://youtu.be/sd0T4WnWLHg**
3. **Circumstances when RCS may use emergency contact details**
    - **https://youtu.be/nByNkfQwMNM**
4. **Providing emergency contact details to RCS**
    - **https://youtu.be/OTXoZ_Xfauk**
5. **Considering using emergency contact details in circumstances that raise 'serious concern'**
    - **https://youtu.be/9ZLphEJqRcU**