

# Information Sharing Policy

This document has been informed by the Data Protection Act (DPA) 1998, the Human Rights Act (HRA) 1998 and the Information Commissioner's Office Code of Practice on Data Sharing. This guidance should be read with in conjunction with the Institute's Data Protection Notice to students and the Student Code of Conduct and with HR policies on Bullying and Harassment and Dignity at Work.

1. Occasionally it may be necessary to share personal and /or sensitive information about individuals who have been identified as vulnerable both internally and with external agencies in order to put in place appropriate support mechanisms.

In these cases the Institute will consider very carefully whether this information should or can be shared based on the following criteria:

- Is it necessary and proportionate to share this information
  - Are there serious concerns about the individual's welfare and safety
  - Is there a legal or statutory obligation for sharing this information
  - Has the individual been consulted and have they consented to sharing this information
2. The purpose of this paper is to provide staff and students transparent guidance on what to do and who to contact in such an eventuality.

This guidance covers the receipt of and passing on of personal or sensitive information, both:

- Within the Courtauld
- By the institution to the Police
- By the institution to other external agencies

### 3. Information that could be shared

- Issues related to an individual's welfare and well being
- Harassment/intimidation/cyber bullying
- Issues to related to the security of individuals or to the Courtauld's property or estates
- Issues related to national security including issues related to the PREVENT strategy.

All information received will be acknowledged, documented, recorded and kept.

4. If an individual feels that they have a concern about either the well-being of another individual or about a security issue either related to an individual or to the Institute's property or estate, in the first instance, such information may be passed on in person, by telephone or by e-mail to:

Head of Student and Academic Services (Students): Shefa Jahan

HR Manager (Staff): Anjum Saad

Facilities Manager (Security and Estates): Anthony Tyrrell

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These staff members have responsibility for assessing the information received and for deciding if this should be escalated to a member of the Courtauld's Senior Management Team. These staff members will use the criteria outlined in section 1 and refer to the following linked policies in making this judgement:

- Data Protection Policy: <https://vle.courtauld.ac.uk/course/view.php?id=995>
- Grievance and Bullying Policy: <https://vle.courtauld.ac.uk/course/view.php?id=995>
- Student Code of Discipline:  
[https://vle.courtauld.ac.uk/pluginfile.php/18836/mod\\_resource/content/1/Code%20of%20Student%20Discipline.pdf](https://vle.courtauld.ac.uk/pluginfile.php/18836/mod_resource/content/1/Code%20of%20Student%20Discipline.pdf)
- Protection of vulnerable adults and children policy:  
<http://courtauld.ac.uk/about/policies/protection-children-vulnerable-adults-policy>
- Guidelines for students on discrimination :  
[https://vle.courtauld.ac.uk/pluginfile.php/21719/mod\\_resource/content/2/Guidelines%20for%20students%20on%20Discrimination.pdf](https://vle.courtauld.ac.uk/pluginfile.php/21719/mod_resource/content/2/Guidelines%20for%20students%20on%20Discrimination.pdf)
- Health and Safety Policy:  
[https://vle.courtauld.ac.uk/pluginfile.php/33472/mod\\_resource/content/0/Health%20and%20Safety%20Policy%20May%202015.pdf](https://vle.courtauld.ac.uk/pluginfile.php/33472/mod_resource/content/0/Health%20and%20Safety%20Policy%20May%202015.pdf)
- PREVENT Referral Process

## **Process**

- a) Receipt of information will be acknowledged to the person who makes the disclosure
- b) Possible actions could be:
  - No action as the risk is low
  - Internal procedures are enacted
  - Security procedures are reviewed
  - Referral of the issue to SMT
  - If there is a breach of the law or it a matter of national security the police or another external agency may be contacted. If the issue is related to PREVENT the PREVENT referral process should be followed.
- c) Any decision to share information internally will be within the Courtauld's internal policies and procedures.
- d) Appendix 1 sets out the internal mechanisms for sharing information internally and externally.

## **Decision to pass information to the Police**

Any decision to pass information to the Police will be within the framework of the Data Protection Act, section 29.

Schedule 4 of the Data Protection Act makes it clear that information may only be disclosed if "transfer is necessary for reason of substantial public interest". Therefore any decision to pass information to the Police will be made under exceptional circumstances, such as in the interest of national security and can only be taken by members of the Senior Management Team

However, in all cases the Courtauld will only release such data if:

- There is a perceived security threat ( Please also see the PREVENT Referral Policy)
- The Courtauld is in receipt of a court order referring to section 29 of the Data Protection Act from the police requesting the lawful release of specific confidential personal data.

Schedule 29(3) of the Act enables the Data Controller to disclose this information if they wish to do so lawfully, however in all cases police must complete a form and send it to the Courtauld.

**Decision to pass information to a third party**

Any decisions to pass personal information to a third party will only be taken in exceptional circumstances and where this poses a significant risk to the individual or to others.

Student Health and welfare	First point of contact	Other points of contact	Possible outcomes	Records kept?
concerns relating to a student's health and welfare (urgent)	Call Emergency Services 2688	Personal Tutor Associate Dean Students Affairs Head of Student and Academic Services	Emergency services may take action Immediate Fitness to Study review may be required with possible immediate suspension if imminent risk to health & safety of self or others Referral to Counselling Please also refer to the Courtauld's *Children and Vulnerable Adults Policy & **PREVENT Referral Policy	Centrally
Ongoing concerns relating student's health and welfare non –urgent including where these conditions may affect the student's learning and assessment.	Personal Tutor ( Personal Tutors may be the individuals who raise the concern)	Associate Dean student Affairs Student and Academic Services Relevant teaching staff where the issues affects the student's learning and assessment	Student advised to contact GP/Gower St/ Counselling Support mechanisms put in place for assessments Possible review of fitness to study. *Please also refer to the Courtauld's Children and Vulnerable Adults Policy & ** PREVENT Referral Policy	Centrally
Report of first aid/other medical intervention on campus (non urgent: low to moderate)	Normal first aid/incident reporting route	Student and Academic Services Student's GP	Ext Circs may be applicable	Centrally

Staff Health and welfare	First point of contact	Other points of contact	Possible outcomes	Records kept?
Concerns relating to staff health and welfare (urgent)	Emergency Services/Line Manager	Head of HR Relevant member of SMT	Referral to Occupational Health Support mechanisms put in place subject to fitness to return to work Please also refer to the Courtauld's *Children and Vulnerable Adults Policy & **PREVENT Referral Policy	Centrally
Ongoing concerns relating staff health and welfare non-urgent	Line Manager ( Line Manager may be the individual who raises the concern)	Head of HR	Line Manager make a Referral to Occupational Health support mechanisms agreed and put in place Please also refer to the Courtauld's *Children and Vulnerable Adults Policy & **PREVENT Referral Policy	Centrally

Protection of children and vulnerable adults	First point of contact	Other points of contact	Possible outcomes	Records kept?
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Refer to the detailed process in the Children and Vulnerable Adults policy	The Courtauld' designated Safeguarding Officer	HR Manager ( staff ) Head of Student and Academic Services ( Students) Facilities Manager Head of Public Programmes ( Summer School and Summer University)	Referral by Safeguarding Officer to external agencies such as Social Services or the Police Please also refer to the Courtauld's *Children and Vulnerable Adults Policy & **PREVENT Referral Policy	Centrally
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Safety and Security	First point of contact	Other points of contact	Possible outcomes	Records kept?
Accidents and Security Issues (urgent) on site	Call Emergency Services 2688	Facilities Manager Relevant member of SMT	Calls to emergency services e.g. Fire, Ambulance or Police	Centrally
Concerns about safety or security issues ( non-urgent)	Security Officers	Facilities Manager Relevant member of SMT	Investigation and action taken address issue possible advice from external agencies.	Centrally

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