



Procedure for police liaison

Version 1.0 (June 2023)

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1. Procedure for police liaison

The RVC aims to maintain a safe environment for all members of our community. It is RVC policy to provide a prompt, helpful and appropriate response when asked for assistance by police who come onto our campuses to attend or investigate an incident, while ensuring that all requests for information about individuals are supported by formal and appropriate documentation and subject to the approval processes set out in these procedures.

Whilst it is important for the RVC to cooperate with the police, all colleagues must also comply with our legal obligations under the General Data Protection Regulations, the Data Protection Act 2018 and duty of care towards staff and students.

When the RVC receives contact from the police or other external agency regarding a student welfare or safeguarding issue it is important that it is handled sensitively, efficiently and in-line with our obligations regarding data protection and student confidentiality. This contact may come through a variety of different channels, but the same principles apply in how we respond to all cases. This procedure outlines how the RVC will respond to contact from the police or other external agencies and sets out the responsibilities for staff (academic and professional services) about how they should respond if they receive such a contact so that it can be appropriately managed, and steps taken to protect the privacy, dignity and welfare of our students.

The RVC has regular contact with law enforcement authorities regarding student welfare, safeguarding or criminal activity. Some examples where the RVC might be contacted by, or be in contact with, the police include:

- When an RVC student or staff member has been a victim of crime
- When an RVC student or staff member is suspected of committing a crime
- When an RVC student or staff member is a potential witness to a crime
- Where there are concerns about the welfare of an RVC student or staff member.
- Where police are conducting an investigation in which they may request personal data or CCTV images relating to staff, students or visitors on the campus.
- Where police are conducting an investigation in which they may require to interview an individual (staff, student, visitor) on the campus.
- Where we receive a notification around a safeguarding issue following or as part of a police investigation
- Where there are concerns about criminal activity in the local area and to discuss wider security initiatives.
- If requested by RVC staff to attend an incident.
- Where the police need to be present on campus as part of an investigation or in regard to a student welfare issue;
- Where the RVC wishes to raise an issue with the police.
- To protect the vital interests of an individual e.g. to contact next of kin where a member of the RVC is involved in a medical emergency
- To attend meetings with managers on campus to support wider security initiatives within the community.

2. Key principles

Regardless of which type of contact, our response needs to be consistent, efficient and guided by our duty of care to the RVC community. Our response requires us to balance a number of potentially competing demands and is based on the following principles:

3. UK GDPR/Data Protection Act requirements

The RVC can share personal data where it is necessary and proportionate to do so. Unless the investigating officer presents a warrant or court order requiring the RVC to disclose personal information about staff or students, the RVC is not obliged to comply with such requests. The UK GDPR and Data Protection Act 2018, provide a framework to allow us to share personal data with law enforcement authorities that need to process personal data for law enforcement purposes, such as the prevention, investigation and detection of crime.

Section 29 of the UK Data Protection Act is an exemption to our legal obligation not to disclose personal data to third parties without the individual's consent. It gives the police the right to ask us to disclose personal data. However, to disclose personal data lawfully to the police, we have to satisfy a two-part test:

- **That disclosure is necessary for one or more of the following purposes:**

the prevention or detection of crime or the apprehension or prosecution of offenders;

and

- **That not disclosing the personal data would be likely to prejudice the purpose cited.**

These provisions do not force the RVC to disclose personal data, but they do allow the RVC to disclose personal data on a voluntary basis, provided that it is necessary and proportionate to do so. In some cases it will be clear why we need to share personal data, whereas in others we may need to carefully consider our reasons for sharing. Therefore all colleagues who receive requests for personal data from the police must follow these procedures to ensure that any disclosures of personal data are lawful, authorised, and auditable.

In all cases requests for information must be passed to the appropriate Responsible Officer as follows:

**Director of Learning and Wellbeing (for requests regarding students) or
Director of Human Resources (for requests regarding staff)**

4. Working on a 'need to know' basis

Working on a need to know basis means that information is only shared when it's necessary and with people who need to know. As an RVC community we need to be aware and mindful of how we document personal data when communicating about ongoing issues as Freedom of Information (FOI) may be requested at a later stage. This reinforces the need to have designated Responsible Officers for responding to requests for personal data. The Responsible Officers will involve staff with the relevant expertise as needed in the response to requests for personal data and the handling of cases and their subsequent actions. This can help manage and contain any anxiety and concern in the RVC community and ensure that those with the appropriate expertise are able to manage enquiries effectively and in line with best practice.

In order to implement effective reputation management for staff, students and the organisation it is important to ensure that the responsible officers outlined in this procedure are kept informed so that they can act to support the best interests of those concerned. It is also worth noting that the management of potentially sensitive situations often rely on our ability to effectively demonstrate not only compassion and effective support of people, but also our operational efficiency and compliance in managing these situations. RVC student support services are best placed to understand the complexity of student welfare issues and work on a need to know basis.

5. Process for responding to requests for information regarding students from the police

Any requests should be passed on to the Director of Learning and Wellbeing and Deputy Director of Learning and Wellbeing/Head of the Advice Centre without delay so that a risk assessment can be conducted. As part of the risk assessment process the Director of Learning and Wellbeing, Deputy Director of Learning and Wellbeing/Head of the Advice Centre and Registrar (or nominee) will:

- Ensure that the request is appropriately responded to.
- Liaise with the police to ensure that a 'data request form' is received by the RVC where appropriate. All requests for personal data must be accompanied by the appropriate data protection form. Completed data protection forms and the decision to withhold or release the information will be sent to the Registrar (for requests involving students) or the Director of Human Resources (for requests involving staff) who will maintain a confidential record of all such requests on behalf of the RVC.
- Liaise with the Governance team/Data Protection Officer where additional advice on information sharing is needed.
- Act as an ongoing point of contact for the police or other external agencies
- Work with External Relations to respond to any media engagement
- Conduct a risk assessment based on the information received to ensure the RVC is assessing and managing any identified risks arising from the incident, is meeting our duty of care to our students and is establishing a co-ordinated approach to supporting the student(s) involved.

- Liaise with relevant colleagues to implement any identified precautionary measures/reasonable adjustments on a need to know basis.
- Review the risk assessment periodically to check precautionary measures remain appropriate or if additional information is received

Having a small dedicated group of people who know the details of these cases, are in the best position to carry out the risk assessment and can make decisions on what precautionary measures need to be in place to safeguard the students involved and the RVC community is essential to manage the situation sensitively and efficiently. It will also enable the RVC to react to changing circumstances in an agile manner and to update and escalate only when needed.

6. Process where the police attend campus as part of an investigation

6.1 During working hours

Irrespective of where the police may arrive on campus, they must be advised to report initially to Security/Reception. Security will then contact the following colleagues by phone and email until one of them responds and can meet with/talk to the police to find out more information:

- Director of Learning and Wellbeing
- Deputy Director of Learning and Wellbeing/Head of the Advice Centre
- Registrar

Once one of the above staff members has spoken with the police they will inform the other two so that a follow up risk assessment can be carried out if necessary. The Director of Learning and Wellbeing will inform the Chief Operating Officer in all cases where the police:

- (i) request access to IT accounts, hard drives, servers or to undertake covert surveillance of user accounts
- (ii) come on to campus to effect an arrest or interview an individual in the course of their investigations
- (iii) request information about or access to a large number of individuals
- (iv) request information about or access to current or former members of staff
- (v) are investigating concerns regarding vulnerable adults or children,

In ALL cases where the police attend the campus, Security must complete an incident report to capture the details of the police visit. The incident report should be sent to the Director of Learning and Wellbeing and Deputy Director of Learning and Wellbeing so that appropriate follow up action can be taken and support offered to anyone affected in line with our student support procedures.

6.2 Outside of working hours

The police should be asked to report to Security. The Security Supervisor will seek as much information as possible about their reason for attendance on campus and will seek authorisation to take appropriate action from the on-call Duty Manager and Director of Learning and Wellbeing or Deputy Director of Learning and Wellbeing/Head

of the Advice Centre, or their nominees, in line with RVC out of hours procedures (see appendix 2).

Where the request is regarding issues outlined in i), iii), iv) or v) above it may be appropriate for the Director of Learning and Wellbeing to seek further advice from the Governance team or Chief Operating Officer the next working day and respond accordingly.

In ALL cases where the police attend the campus, Security must complete an incident report.

7. CCTV images

Requests for disclosure of images and CCTV recordings are subject to the RVC CCTV procedures.

8. Where police have information and wish to conduct an interview/effect an arrest

Where the RVC is made aware in advance of a police visit the information must be passed to the Director of Learning and Wellbeing or Deputy Director of Learning and Wellbeing who will work with the police and relevant RVC colleagues to identify how the situation can best be managed. This is to ensure any visits to campus to conduct interviews/effect an arrest are done with the appropriate level of discretion and that the matter is handled discretely and sensitivity, wherever possible taking steps to respect the privacy of the individual concerned.

However, it must be recognised that:

- The police have a right to go direct to the individual, wherever they are on the campus.
- There will be occasions when the police consider the matter to be the personal business of the member of staff or student and must maintain confidentiality in order to comply with the UK Data Protection Act. The police will not therefore inform the RVC in every case.

Any colleague who is aware of a direct police approach to a member of staff or student should inform the Director of Learning and Wellbeing and Deputy Director of Learning and Wellbeing/Head of the Advice Centre, in the case of students, or the Director of Human Resources, in the case of staff, so that follow up actions can be implemented and support offered to those involved and so that a central record of all police visits and requests can be maintained.

9. Responsible Officers

9.1 For requests relating to students

Director of Learning and Wellbeing, Michele Milner, mmilner@rvc.ac.uk - is responsible for liaison with police regarding requests for information about RVC

students and/or student welfare issues and co-ordinating any appropriate action or support including escalation to the Chief Operating Officer.

Deputy Director of Learning and Wellbeing/Head of the Advice Centre, Steve Short, sshort@rvc.ac.uk - is responsible for liaison with police regarding requests for information about RVC students and/or student welfare issues and co-ordinating any appropriate action or support in the absence of the Director or at the Directors request.

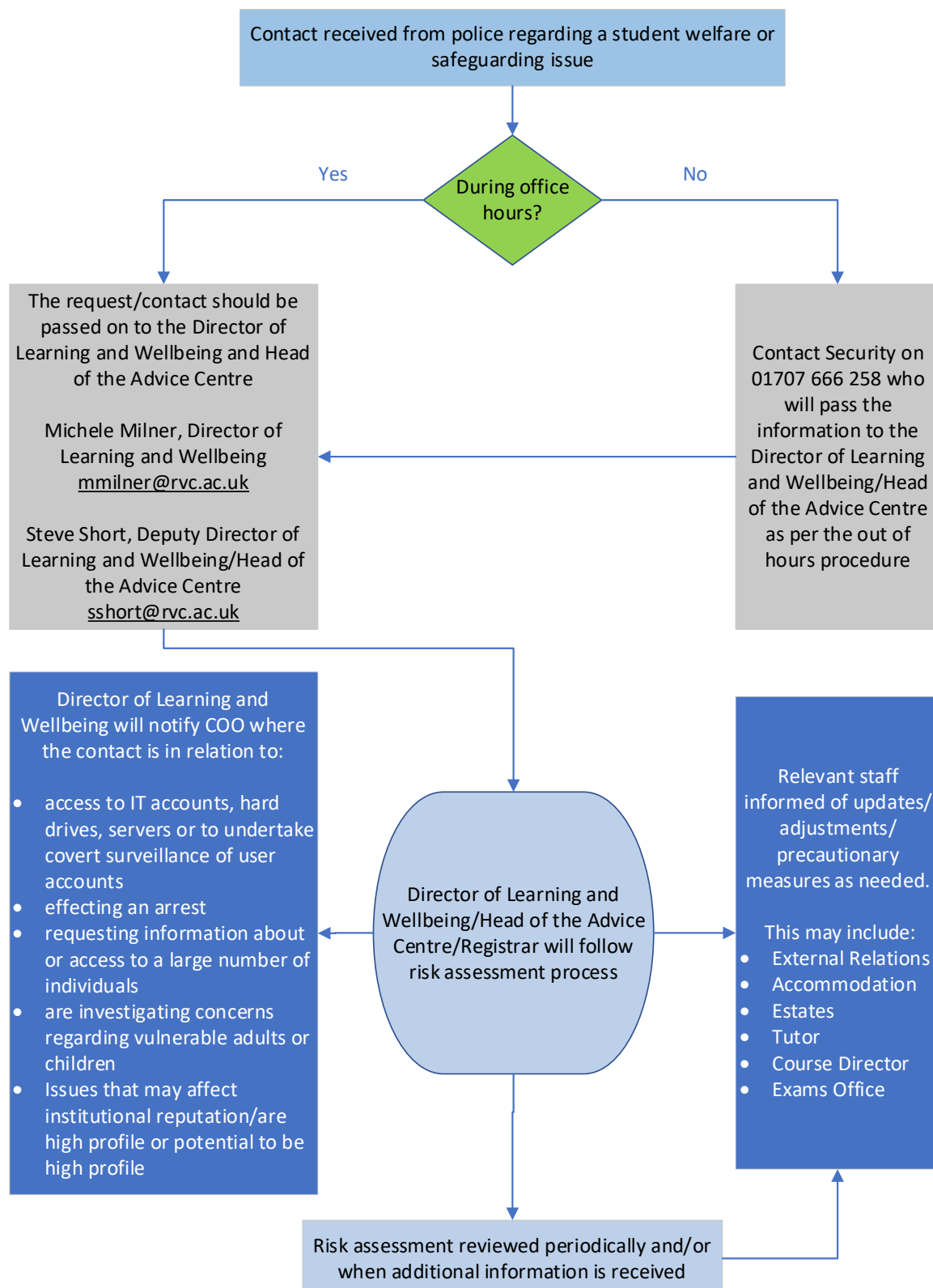
Registrar, Nerys Evans, nevans@rvc.ac.uk (or nominee in their absence) - is responsible for updating of student records and communication of any precautionary measures arising from police contact and subsequent risk assessment in conjunction with the Director of Learning and Wellbeing.

9.2 For requests related to staff

Director of Human Resources - is responsible for liaison with police regarding requests for information about RVC staff and/or staff welfare issues and co-ordinating any appropriate action or support.

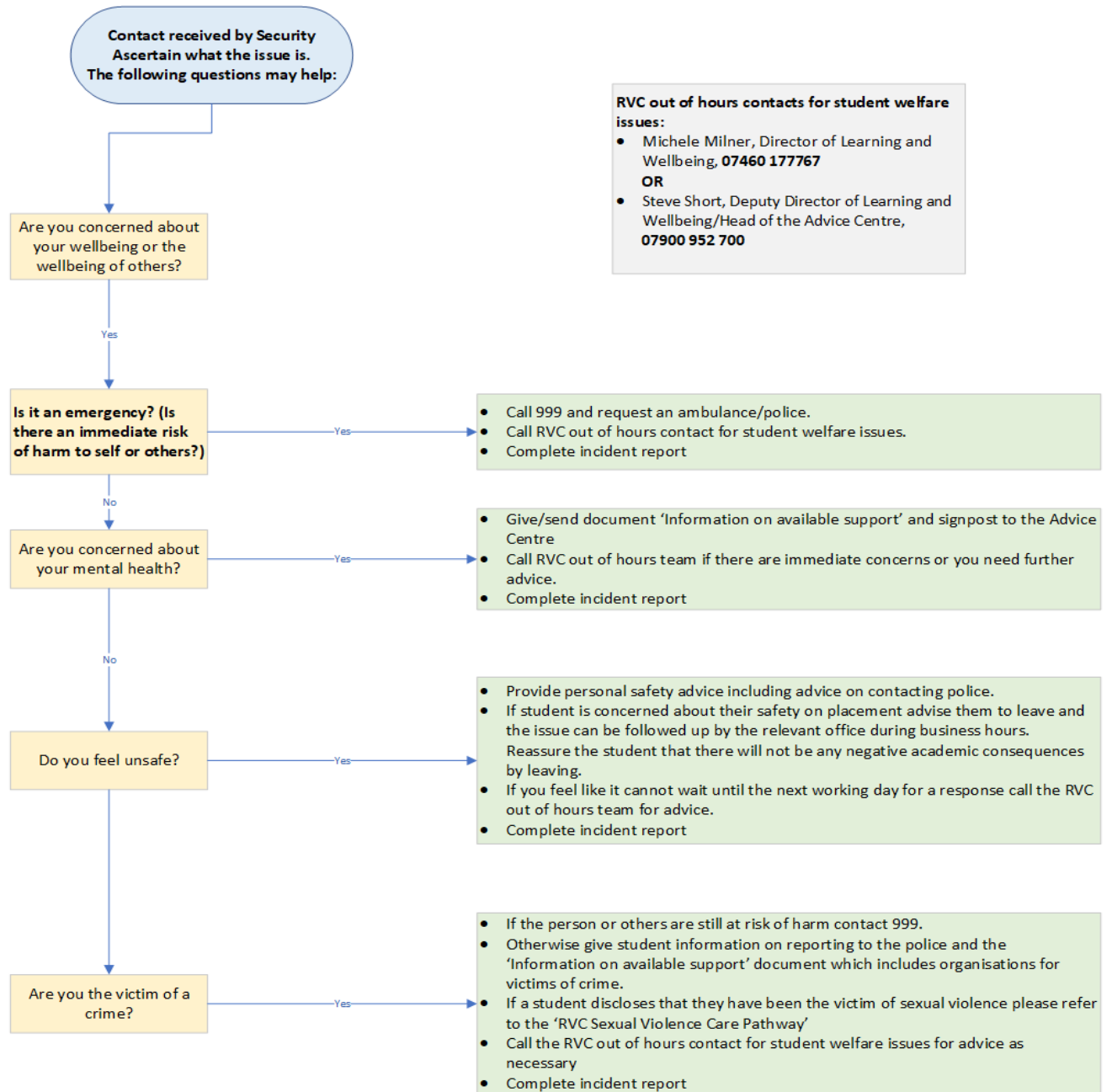
Appendix 1 – Process for responding to police contact regarding student welfare or safeguarding issue

Process for responding to police contact regarding student welfare or safeguarding issue



Appendix 2 – Process for out of hours student welfare concerns

Process for out of hours contact with Security – welfare concerns



Security will record all contacts and send reports to:

- Michele Milner, mmilner@rvc.ac.uk
- Steve Short, sshort@rvc.ac.uk
- Advice Centre, advice@rvc.ac.uk

for follow up during working hours. Reports must include what happened, the name and contact details of the person making contact, name and contact details of anyone else affected and what actions have been taken and by whom.

Appendix 3 - RVC Student Safety Risk Management Tool

Where necessary, following a disclosure of misconduct or contact from external agencies regarding a student welfare or safeguarding issue, a case management meeting will be convened and Chaired by the Director of Learning and Wellbeing and attended by the Registrar (or nominee), Head of the Advice Centre and any other identified members from appropriate teams as needed, to review the current situation, conduct a risk assessment and identify and agree actions that the College will take to mitigate any identified risks. This will ensure the College is assessing and managing identified risks arising from the incident, is meeting our duty of care to our students and is establishing a co-ordinated approach to supporting the student(s) involved.

This form should be completed so that agreed actions are clearly assigned, documented and can be appropriately stored.

Case details

Date incident report/disclosure received:

Date of risk assessment meeting:

Risk assessment completed by:

Reporting student(s)/staff member:

Reported student(s)/staff member:

Date of risk assessment review meeting:

Ahead of any investigation, whether it is a criminal investigation or an investigation under an RVC procedure, the RVC will put in place any precautionary actions necessary, without any presumption of guilt, in order to best support the students/staff involved pending the outcome of police/RVC investigations. These precautionary actions may include:

- Considering measures to seek to prevent the accused student from coming into contact with the reporting student.

- imposing conditions on the accused student (for example, requiring the accused student not to contact the reporting student and/or certain witnesses and/or requiring the accused student to move accommodation)
- Suspending the accused student from his/her studies (such a step will only be taken where the risk level is high and where there are no alternative measures that could be put in place to mitigate that risk). Further, any suspension should be fixed for a specified period of time and subject to review at regular intervals. The suspension will be neutral and does not imply any presumption of guilt.
- Excluding the accused student from identified activities (for example, prohibiting the accused student from going to certain accommodation blocks or using the sports facilities or from attending a placement).
- Alternative teaching arrangements being implemented for a temporary period until the investigation has been completed and a decision on possible action taken.
- Ensuring appropriate support has been offered to all students involved in or affected by the incident
- If any of the students affected by the incident require time away from the RVC making the necessary administrative arrangements for this to happen and ensure no inappropriate communication is sent from the RVC in regards to attendance.
- If the alleged perpetrator is a fellow student at RVC or there are concerns about the alleged perpetrator trying to contact the alleged victim on campus, Security can draw up a safety plan with the alleged victim.
- Agreeing a timescale for regular follow up with the student(s) if they express a need for support and ensure all parties are aware of the actions they need to take and are responsible for.
- The Registrar and/or the Director of Learning and Wellbeing (or their nominees) meeting with the alleged perpetrator (if they are an RVC student) to discuss support/bail conditions/practical arrangements to manage the situation

Reporting student		
Risk area	Risk level	Action to mitigate
Risk from others – points to consider ↓ <ul style="list-style-type: none"> - Reported person - Someone connected with reported person - Staff/students (e.g. cohort, flatmates) - Threats made - Domestic violence - Pattern of abuse 		
Risk to others – points to consider ↓ <ul style="list-style-type: none"> - Reported person - Someone connected with reported person - Staff/students (including disruption of study, demands on staff) - Threats made - Risky behaviour that impacts others' safety 		
Risk to self – points to consider ↓ <ul style="list-style-type: none"> - Self-harm - Suicide (thoughts/behaviour) - Risky behaviour that impacts own safety - Drugs/alcohol 		
Accommodation – points to consider ↓ <ul style="list-style-type: none"> - Does student reside in College Halls of Residence? - In same accommodation as reported person? - Did sexual violence take place in current accommodation? - Safety concerns for others in shared accommodation? 		

<ul style="list-style-type: none"> - Is accommodation currently secure? 		
<p>Education – points to consider ↓</p> <ul style="list-style-type: none"> - On same course as reported person? - Course content - Placement (including safety of self and others on placement) - Deadlines (exams/assessments) - Extenuating circumstances - Graduation 		
<p>Mental health and wellbeing – points to consider ↓</p> <ul style="list-style-type: none"> - Is student already known to student support services? - Mental health history - Current mental health condition - Self-harm/suicide (see risk to self above) - Concern about personal safety - Family/friends/support network - Coping strategies - Access to emotional support 		
<p>Safeguarding – points to consider ↓</p> <ul style="list-style-type: none"> - Children involved? - Adults at risk of harm involved? 		

Reported student		
Risk area	Risk level	Action to mitigate
Risk from others – points to consider ↓ <ul style="list-style-type: none"> - Reporting person - Someone connected with reporting person - Staff/students (e.g. cohort, flatmates) - Threats made - Domestic violence - Pattern of abuse 		
Risk to others – points to consider ↓ <ul style="list-style-type: none"> - Reporting person - Someone connected with reporting person - Staff/students (including disruption of study, demands on staff) - Threats made - Risky behaviour that impacts others' safety 		
Risk to self – points to consider ↓ <ul style="list-style-type: none"> - Self-harm - Suicide (thoughts/behaviour) - Risky behaviour that impacts own safety - Drugs/alcohol 		
Accommodation – points to consider ↓ <ul style="list-style-type: none"> - Does student reside in College Halls of Residence? - In same accommodation as reporting person? - Did sexual violence take place in current accommodation? 		

<ul style="list-style-type: none"> - Safety concerns for others in shared accommodation? - Is accommodation currently secure? 		
<p>Education – points to consider ↓</p> <ul style="list-style-type: none"> - On same course as reporting person? - Course content - Placement (including safety of self and others on placement) - Deadlines (exams/assessments) - Extenuating circumstances - Graduation 		
<p>Mental health and wellbeing – points to consider ↓</p> <ul style="list-style-type: none"> - Is student already known to student support services? - Current mental health condition - Mental health history - Self-harm/suicide (see risk to self above) - Concern about personal safety - Family/friends/support network - Coping strategies - Access to emotional support 		
<p>Safeguarding – points to consider ↓</p> <ul style="list-style-type: none"> - Children involved? - Adults at risk of harm involved? 		

Internal investigation + criminal justice process		
Risk area	Risk level	Action to mitigate
Criminal justice process – points to consider ↓ <ul style="list-style-type: none"> - Reported to police? - Police investigation/court case? - Key dates impacting risk - College action affecting e.g. evidence, contact with witnesses? - College holding first report? 		
Internal investigation – points to consider ↓ <ul style="list-style-type: none"> - Reported to relevant disciplinary procedure? - Timeline of disciplinary process - College action affecting e.g. police investigation, evidence, contact with witnesses? - Internal staff with expertise to carry out interview/investigation? - Safely able to gather evidence? 		

Where a report has been made to the police and they are investigating the incident as a criminal matter the RVC will normally defer its own internal procedure until the police investigation is concluded so as not to compromise the investigation. The RVC will follow the advice given by the police on this on a case by case basis. The RVC is limited as to the investigations it can carry out in respect of serious offences. The RVC may commence disciplinary action in relation to any matter which was not part of the criminal investigation e.g. in a case where a student acted abusively to another student after taking drugs, the police may be prosecuting the student for the supply of drugs but not the abusive behaviour. In that situation, the RVC reserves the right to undertake disciplinary proceedings in relation to the abusive behaviour but any action in relation to the drug use would have to be suspended until the outcome of the criminal process was known.

If there is an ongoing police investigation the Director of Learning and Wellbeing will take the lead on liaising with police and updating senior colleagues to ensure all relevant parties are aware of the progress of the investigation. The RVC should endeavour to keep updated about the progress of the criminal investigation and review the position at regular intervals (or any time that there is a material change or development). The review should include consideration of whether any changes need to be made to the initial risk assessment and, consequently, whether any changes need to be made to the support/assistance given to both students and/or to any precautionary measures that have been put in place (this could include new measures being put in place or current measures being amended or removed). For example, if the accused student is failing to comply with the precautionary measures that have been put in place then more restrictions may have to be placed on that student (this may lead to temporary suspension).

The RVC reserves the right to implement its own disciplinary investigation once a criminal investigation is complete regardless of the outcome of that criminal investigation. The RVC also reserves the right to complete its investigation in the event of students withdrawing from their studies during the investigation process.

Risk Management

To be used to identify level of risk and to review current level of risk

Very High	High	Medium	Low
High risk of harm to self, others, or justice process. Likely to require immediate action and/or joint working with external agencies.	Risks identified and require action to mitigate. Has potential to become more risky if actions not taken.	Some risks identified but being appropriately managed – no further action required at this time.	No risks identified.