



Procedure for police liaison

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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

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 of

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.

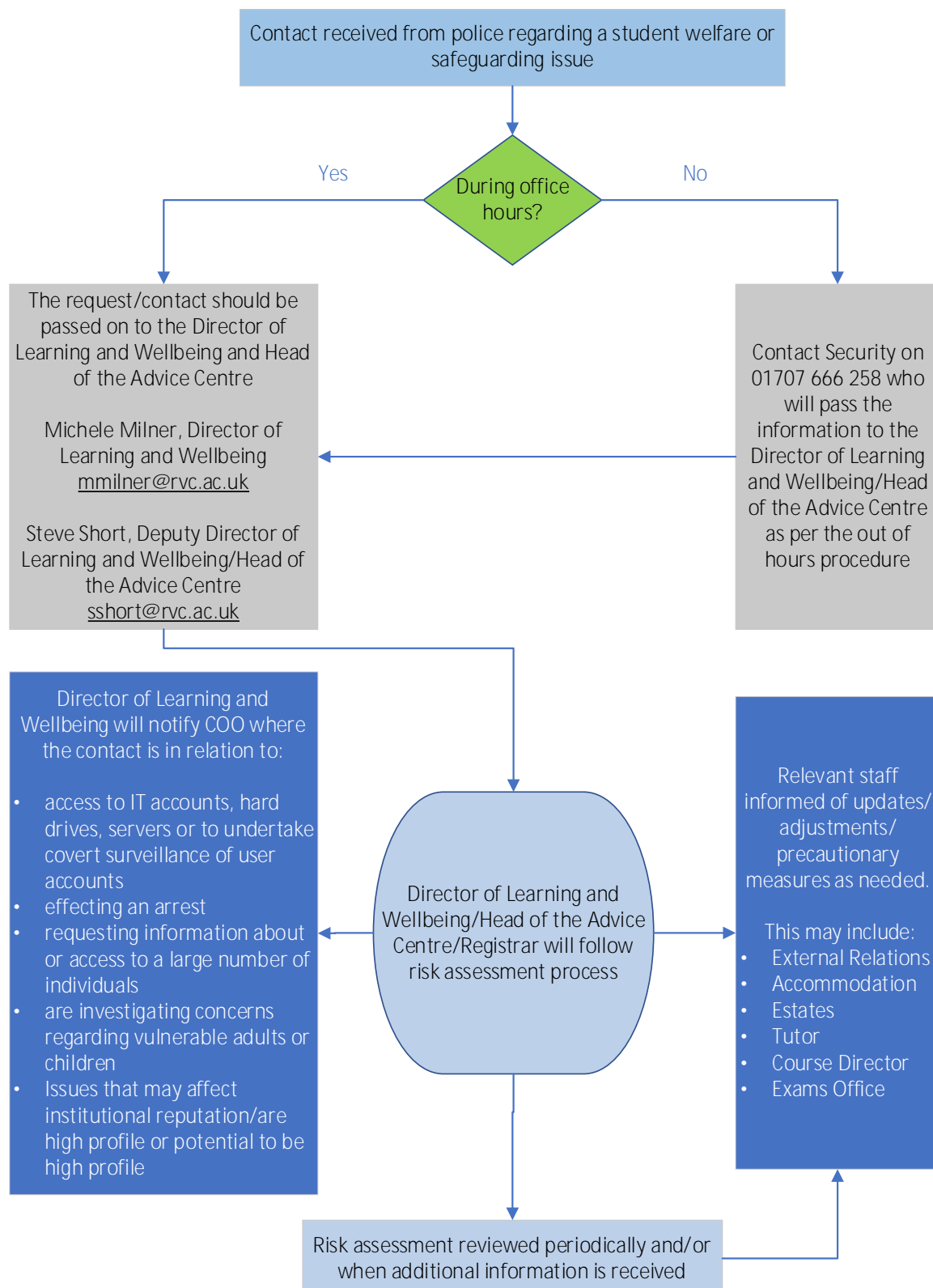
Registrar, Nerys Evans, nevans@rvc.ac.uk (or nominee in their absence) - is responsible for updating of student records and communication of any precautionary measures arising from police contact and subsequent risk assessment in conjunction with the Director of Learning and Wellbeing.

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.

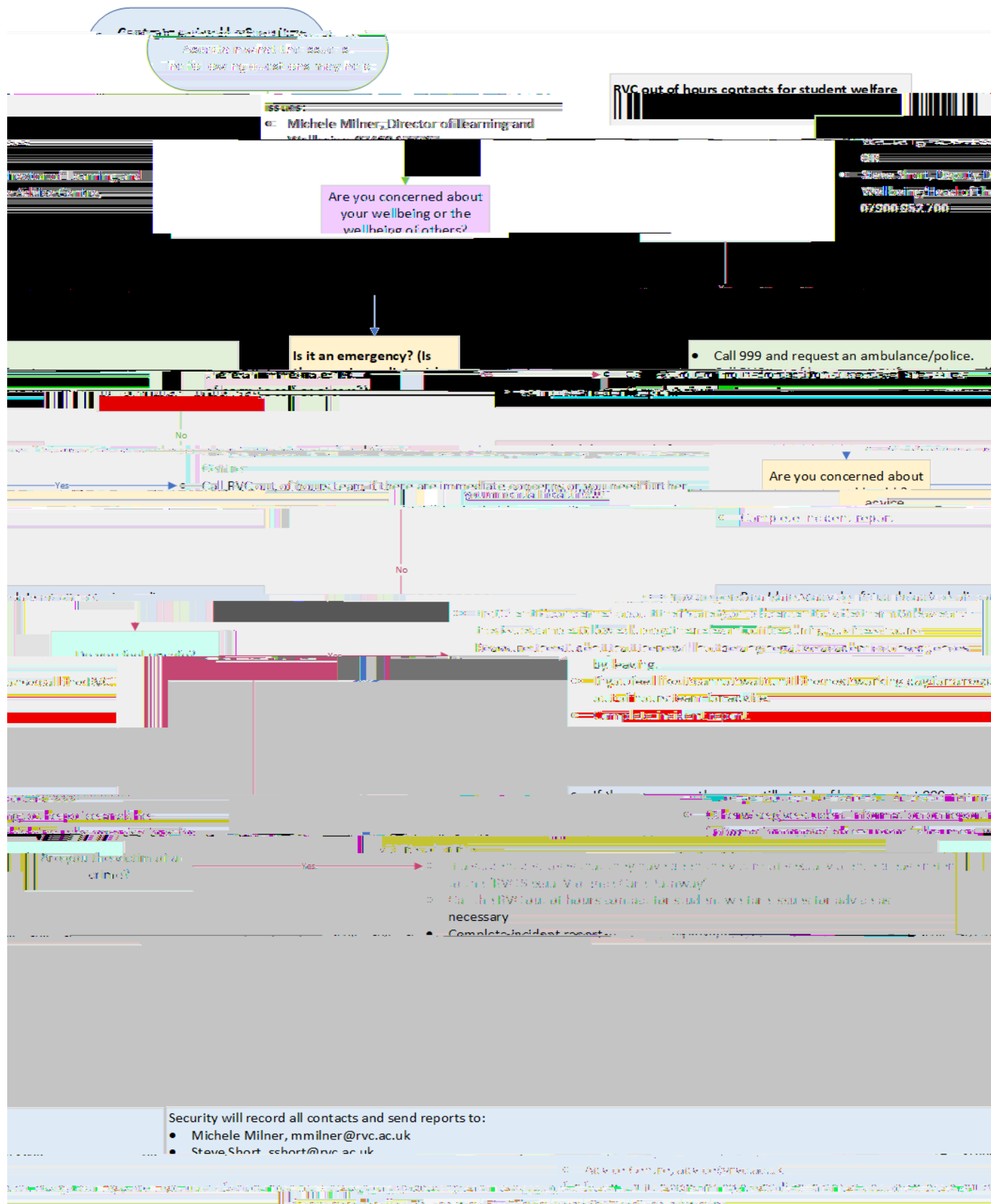
Appendix 1 – Process for responding to police contact regarding student welfare or safeguarding issue

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



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

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.