



## Information Sharing Protocol (London Campus)

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## Purpose and objectives

This document aims to set the procedures which will permit the secure, lawful and confidential sharing of sensitive information between students, appropriate organisations and ESCP Business School, to enable the safeguarding of vulnerable adults and/or adults at risk in accordance with national policy, Prevent Duty and other legislative requirements.

The objective is to inform staff members and students of ESCP Business School why information about them may need to be shared under the circumstances above, and to outline how the sharing of sensitive information will be managed by the School.

## Information Sharing Protocol

Human Resources has taken measures to ensure all staff with student interaction are fully informed on the Data Protection Act 1998 and the General Data Protection Regulation 2016/679, GDPR. As such, staff members such as Programme Managers /Student Services staff and teaching staff who may be the first observers of vulnerable individuals, fully understand the implications of their obligations under the DPA and GDPR and their duty of confidentiality.

The School understands that as a higher education institution, it is necessary to strike a balance maintaining the trust of students and encouraging them to be open to seeking appropriate support, and not guaranteeing absolute confidentiality in the event of safeguarding the School where there may be risk to others.

### Stage One

The Prevent Officer is available for all staff with concerns to report to in confidence. Staff members should gather information and contact the Prevent Officer by emailing prevent@camden.gov.uk or calling 02079742010. The Prevent Officer will contact emergency services if they judge that there is an immediate risk of danger.

Should a staff member have concerns regarding a vulnerable person who may be at risk, they should consider if data sharing and individual consent is necessary and lawful by Channel Duty exemption - and consult the Data Protection Act 1998, Human Rights Act 1998, General Data Protection Regulation 2016/679, Prevent Duty and School policies

If there is no immediate threat following evaluation of the gathered information, staff should liaise with the Prevent Officer.

### Stage Two

The Prevent Officer will evaluate the concern on a case by case basis with the staff member, with adherence to the School's Data Protection Policy, Prevent Duty, Data Protection Act 1998 and Human Rights Act 1998. If concerned by a vulnerable individual's behaviour and potential risk, the School will share these concerns with the appropriate external agencies.

Should there be a valid concern, the Prevent Officer will contact ESCP Business School's external Regional Prevent Contact and/or Police with either:

- The evidence and information, with the individual's consent / consultation,
- Anonymised, encrypted and securely shared data (if the case can be analysed anonymously)



- Encrypted and securely shared data **without** the individual's consent (with justifiable and lawful reasons). Wherever possible the consent of the person concerned must be obtained before sharing any information about them.

Following consultation, it may be that internal ESCP Business School welfare support is all that is needed. The Police may also recommend a Channel support package is necessary (See <https://www.gov.uk/government/publications/channel-guidance> for details on Channel)

In all options, only the sufficient amount of information relevant in order for the concern to be appropriately evaluated, in judgement of the risks to an individual or the public will be shared. In keeping with the Common Law Duty of Confidentiality, the School should maintain awareness of their own responsibilities under the Data Protection Act and any confidentiality obligations that exist in their judgement. The exchange of information between police and partner agencies, including HEIs is covered by sections 17A and 115 of the Crime and Disorder Act 1998. Information exchanged between police and partners must remain confidential.