

UCFB

Information Governance Statement:

Transparency and Confidentiality for Harassment & Sexual Misconduct Reporting

This statement outlines the principles of information governance for data related to harassment and sexual misconduct reports within the institution, specifically addressing the unique requirements of anonymous reporting. The institution is committed to fostering a safe environment, and integral to this commitment is ensuring that individuals feel secure in reporting incidents, whether confidentially or anonymously.

1. Purpose and Scope

This statement applies to all data collected, processed, and stored in relation to reports of harassment and sexual misconduct made to the institution. It is designed to provide clarity on how such sensitive information will be handled, prioritising both the safety of individuals and compliance with legal obligations. Given the sensitive nature of these reports, this policy outlines additional safeguards beyond standard data protection measures, particularly concerning the right to anonymity for reporters.

2. Principles of Data Handling

- **Confidentiality:** All reports of harassment and sexual misconduct will be treated with the utmost confidentiality. Information will only be shared on a strict "need-to-know" basis with individuals directly involved in the assessment, investigation, or support processes.
- **Anonymity:** The institution is committed to enabling anonymous reporting wherever possible. When a report is made anonymously, all reasonable measures will be taken to ensure the identity of the reporter is not revealed. This data will be handled distinctly from other confidential data, with the specific condition that it **must not be used or disclosed for any other purpose, including external reporting, if doing so would compromise the anonymity of the reporter.**
- **Transparency:** While upholding confidentiality and anonymity, the institution aims to be transparent about its processes for handling reports and the types of data collected. This statement forms part of that commitment to transparency.
- **Security:** Robust technical and organisational measures will be implemented to protect all data related to harassment and sexual misconduct reports from unauthorised access, disclosure, alteration, or destruction.

3. Data Collection and Storage

To ensure the integrity of our information governance, the following areas require specific confirmation and detailed planning:

- **Methods of Data Collection:** Online reports will be captured via the [Anonymous Reporting Form](#) or the [Reporting Form with Contact Details](#). Reports in person will be added to the Reporting Form spreadsheet alongside the online reports.

- **Data Storage:** All information related to reports is handled sensitively and stored in compliance with data protection legislation.
- **Access to Data:** Data will be accessed by Head of Student Support (or nominee), Director of Academic and Student Services, Human Resources and the Academic Quality Team (Resolutions). Access is strictly limited to a defined group of authorised personnel who require it for their duties.
- **Data Access Requests:** Data access requests are handled in compliance with data protection legislation

4. Disclosure and Legal Obligations

The institution acknowledges that there may be exceptional circumstances where information, even from an anonymous report, may need to be disclosed to a third party.

- **Legal or Legitimate Reasons:** In rare cases where there is a legal obligation or other compelling legitimate reason to disclose information (e.g., to prevent serious harm, comply with a court order, or meet statutory reporting requirements), the institution will act in accordance with applicable laws and regulations.
- **Protecting Anonymity:** In such circumstances, every effort will be made to protect the identity of the reporting individual. If the identity is known, it will be redacted unless legal obligations explicitly require its disclosure to authorities. The primary aim will always be to maintain the anonymity of the reporter if the report was made on that basis.
- **Internal and External Reporting:** While the anonymous report itself must remain confidential, the actual nature of the report may necessitate internal or external reporting (e.g., to law enforcement in cases of criminal activity). In these instances, the focus will be on the incident itself, ensuring that the anonymity of the reporter is preserved unless legally impossible.

5. Review and Oversight

This statement will be regularly reviewed annually on behalf of the Board of Directors. An **annual report** will be presented to the Board of Directors, as outlined in the institution's Schedule of Business, to ensure continued accountability and progress.