Report and Support Services – Confidentiality Note

Version 1

# Report and Support Services - Confidentiality Note

When using the Report and Support Services form that includes your personal details, Bloomsbury Institute will aim to keep your information confidential which means that only people dealing with your report would usually see a copy. There are, however, circumstances when we may be required to share your information with others. The purpose of this guidance is to provide more information on how we keep your information confidential and how/when we might share it with others. If you have any questions on confidentiality and your report, please contact Antony Charles, Head of People and Development at antony.charles@bil.ac.uk.

**Anonymous reporting**

If you choose to report anonymously, the report will not ask for information that is identifiable to you. In addition, Bloomsbury Institute encourages individuals making an anonymous report not to include names or other information that could be used to identify a third party. Nevertheless, we acknowledge that there may be circumstances in which it is appropriate to make an anonymous report containing such information. Such information will be used for statistical purposes and inform prevention work. For further information, please see the Report and Support Services Privacy Notice.

**Named reporting**

If you choose to use the form ‘Tell us with contact details’ which means you are making a named report, then there are certain circumstances when a copy of all or part of the report will be shared with others. For example, where there is an allegation about behaviour by a staff member or student towards an adult at risk (for example, if an adult is in immediate danger or is at risk of harm, a crime is in progress, has occurred or may occur, or the adult’s life is at risk). For further information on this point, please see the Report and Support Services Privacy Notice and our separate Duty of Care Guidance.

Bloomsbury Institute’s intention is that the reports made on the forms provided are not routinely used in investigations and disciplinary processes. If you want your complaint to be investigated, then we ask you to follow the formal procedures for staff and students to initiate this process. When disclosure of the initial report is made to an investigator or as part of a disciplinary process then we will ordinarily notify you and you can discuss the reasons for the disclosure as well as raise any objections. Bloomsbury Institute understands the importance of keeping your information confidential where we are able to do so. We also take a strict position in respect of retaliation against someone for raising a complaint.

**Subject access requests**

Under data protection laws, individuals are able to make a subject access request (SAR) to obtain data held by Bloomsbury Institute about them. If you make a SAR that includes a request that covers your report, then you will receive a copy of your personal data in your report. If the subject of your complaint makes a SAR and the scope of their request covers their personal data in your report, then we are legally required to share this. They would not be entitled to receive details of your name although it is possible that they may be able identify you when we provide their data. An example of when this might be likely is if a specific event or incident is named in the report and the individual requesting the SAR is able to guess your identity from this information.

Our Data Protection Officer will try to balance our aim of protecting your confidentiality with the other person’s right to receive their personal data. When your personal data is inextricably linked with the personal data of the subject of the complaint then Bloomsbury Institute will apply the rules around mixed data[[1]](#footnote-1). These rules can be helpful in allowing us to protect your confidentiality, but they do not provide an absolute guarantee we can keep your report confidential.

In addition to being able to request the personal data in the report, both you and the subject of the complaint can request your personal data in any correspondence and documents (whether electronic or hard copy) created following your initial report that is held by Bloomsbury Institute. The mixed data rules apply in the same way to any correspondence or other document created following your initial report.

**Meeting with a member of the Student Engagement, Wellbeing and Success (SEWS) team**

For students, our SEWS team are trained in providing initial advice to you on the various support options available, with a focus on informal resolution. If you want to take a matter further, a member of the SEWS team will connect you with the Director of SEWS who can provide detailed guidance on formal procedures. In addition, the Director of SEWS has been trained as a Sexual Violence Liaison Officer to support reports relating to sexual harassment and misconduct. In the event the matter proceeds to a disciplinary hearing then it is possible that your meeting may be disclosed to the disciplinary panel, the People and Development staff supporting the process (if a staff member is the subject of your complaint), the subject of the complaint and their adviser or representative.

**Meeting with the Deputy Chief Operating Officer (DCOO)**

For staff and relative to sexual harassment or misconduct reports, our DCOO is a trained Sexual Violence Liaison Officer and is able to provide specialist initial support advice. If you meet with the DCOO and want to take your report further, the DCOO will connect you with the Head of People and Development.

**Meeting with the Head of People and Development**

For staff, the Head of People and Development is able to provide detailed guidance on the options available to you in respect of your report. Notes taken are usually retained as a record and may be included as part of a disciplinary process, although this is not routinely the case.

**Duty of Care: Escalation circumstances**

When you have made a report, even if you decide not to take it any further, there are certain circumstances when Bloomsbury Institute may share the report with third parties. This is usually because there are concerns for your safety or another person’s safety. More information is provided in the Duty of Care Guidance.

**Investigation**

If you make a named report, you will ordinarily have control over whether or not the matter is investigated by Bloomsbury Institute. There are certain limited circumstances when we would investigate even if you do not want us to. The key reasons are set out here [link to Duty of Care Guidance].

If you want your complaint to be investigated, then you will be asked to provide a more detailed written account of your complaint. It is this account that would be given to an investigator and may be included in the bundle of documents for any subsequent disciplinary hearing.

**Disciplinary or other formal hearing**

If an investigation takes place, one of the possible outcomes is that the matter is referred to a disciplinary hearing. A copy of the initial report made on the submitted report form will not routinely be included in the disciplinary hearing bundle, to the disciplinary panel, to the subject of the complaint or to his or her advisors. This is because you will have been asked to provide a more detailed complaint in writing. There may be limited occasions when the original report you have made by the submission of a reporting form is disclosed as part of a disciplinary process. An example might be if the subject of the complaint or their advisers has managed to obtain part of your initial report (e.g. through a SAR) and has identified information in the initial report that is inconsistent or otherwise conflicts with what you have included in your formal report.

**Litigation**

Bloomsbury Institute tries to resolve complaints internally using its own processes such as the staff disciplinary process. Sometimes individuals are unhappy with the internal process and/or its outcome. An example is if the subject of your complaint is disciplined or dismissed and considers that the process followed was unfair. Some individuals consider that the appropriate next step is to bring legal action against Bloomsbury Institute and on rare occasions, certain claims can be brought against Bloomsbury Institute employees personally. Individuals who make a complaint against another person in good faith are protected against retaliation and Bloomsbury Institute takes retaliation very seriously.

If a claim is brought against Bloomsbury Institute or (on rare occasions) against any of its employees, then there are specific rules Bloomsbury Institute must follow concerning the documents it needs to provide to the individual who has started the litigation. This process of providing documents is called disclosure. A copy of the initial report you have made may be disclosed to the person bringing the claim, also referred to as the claimant. Bloomsbury Institute aims to protect your confidentiality when making a report using the information you provide on a report form. A copy of the report you make will not ordinarily be used in any formal investigation or disciplinary process but as outlined above there are instances when all or part of the report may be shared with others. If you have any questions about confidentiality, please contact Antony Charles, Head of People and Development at antony.charles@bil.ac.uk.

**Review**

This is Version 1 of the Report and Support Services Confidentiality Note. Last updated 2 July 2025. This document will be reviewed annually.

1. Mixed data refers to datasets containing personal information about multiple individuals. Examples include customer records, employee files, or research data where information about different people is intertwined. The UK GDPR and Data Protection Act 2018 govern how this data is handled. [↑](#footnote-ref-1)