Report and Support Services – Privacy Notice

Version 1: July 2025

# Report and Support Services – Privacy Notice

## About this privacy notice

Bloomsbury Institute (“we” “us”, or “our”) respects your privacy and is committed to protecting your personal data.  
  
Please read this Privacy Notice carefully. It describes why and how we collect and use personal data in the context of Report and Support Services and provides information about your rights.   
  
This Report and Support Services privacy notice applies to personal data provided to us by individuals themselves and/or by third parties. This privacy notice should be read in conjunction with our:

* [Privacy notice](https://www.bil.ac.uk/qem/section-3/)(for students)
* [Data Protection and Confidentiality Policy](https://www.bil.ac.uk/qem/section-3/) (for staff, students and other parties)

We keep this privacy notice under regular review.

# What is ‘personal data’?

'Personal data' means any information which identifies you as an individual. It may include your name, but it may also be other information such as your date of birth, nationality and gender which, when combined, could identify you.

It does not include information which does not relate to an identified or identifiable individual, or to personal data rendered anonymous in such a manner that the individual is not or is no longer ‘identifiable.‘

‘Sensitive personal data’ or 'special categories of personal data' such as information about racial or ethnic origin, political opinions, religious beliefs or other similar beliefs, trade union membership, physical or mental health and sexual life, are given a high level of protection under data protection law. Personal data relating to criminal convictions and offences are also given additional protections.

# Bloomsbury Institute’s data protection obligations

Under current data protection laws, Bloomsbury Institute is a *controller*, as we determine the purposes for which, and the manner in which, any personal data is, or is likely to be, processed. This means that we are legally responsible for the personal data we collect and hold about you.  
  
One of our responsibilities is to tell you about the different ways in which we use your personal data – what information we collect (and our legal basis for doing so), why we collect it, where we collect it from and whether (and with whom) we will share it. We also need to tell you about your rights in relation to the information. This notice provides further details about all of these issues in respect of our Report and Support Services.

# **About the Report and Support Services at Bloomsbury Institute**

The Report and Support Services provides staff and students with the means to report issues of bullying, harassment and sexual misconduct and also seek support where required.  
   
Reports can be made by Bloomsbury Institute staff and/or students and may be either:  
  
(a) **anonymous**, whereby no names or other information that could be used to identify the individual making the report are provided. Bloomsbury Institute encourages individuals making an anonymous report not to include names or other information in free text boxes that could be used to identify a third party. Nevertheless, we do acknowledge that there may be circumstances in which it is appropriate to make an anonymous report containing such information; or  
  
(b) **named**, whereby the names and contact details of the individual making the report are included. In addition to names or other information which could be used to identify third parties.   
  
Further detail on the data collected and how we will use that data in each of the above circumstances is set out below.  
  
**Please note that where you make a report through the Report and Support Services forms, Bloomsbury Institute will usually disclose information to its staff members on a need-to-know basis only.**

**We will not take actions such as investigating the complaint, initiating disciplinary or other formal proceedings (including litigation) or passing information on to third parties in order to take the report further unless: (a) you have made a named report; and (b) you agree to this action.**  
  
**There are certain circumstances in which Bloomsbury Institute may take action (such as those listed above) even where: (a) an anonymous report is received; or (b) you have made a named report but you do not wish to take your report further.** **This is usually where there are concerns for your/another person’s safety. Please see section 7 below and our separate** Duty of Care Guidance**and**Confidentiality Note **for further information on this point.**  
  
The Report and Support Services forms are not designed to be used when reporting potential safeguarding or other issues to Bloomsbury Institute which may relate to an individual's criminal convictions and offences. If you become aware of a safeguarding issue, please follow the procedures set out in Bloomsbury Institute’s Safeguarding Policy [*here*](https://www.bil.ac.uk/qem/section-3/)*.* Information relating to an individual's criminal convictions or offences must not be included in a report. **Any criminal convictions information included in a report will be removed before the report is processed.**

There are limited circumstances in which criminal convictions data included in a report would be passed to the relevant department within Bloomsbury Institute, as set out in our Duty of Care Guidance [link].

# Personal data that we collect about you

***Anonymous reports***  
  
If an anonymous report is made, the Report and Support Services forms are set up so that we do not know who has made the report. In the anonymous report form, Bloomsbury Institute discourages the provision of names or other information that could be used to identify a third party. However, if any such information is shared, Bloomsbury Institute will use that information in order to review and process the report.   
  
***Named reports***  
   
If a named report is made, we may collect, use, store and transfer different kinds of personal data about the person making the report. This may include:

* Your name, contact details and other information about you such as your School (for example, if you study Law, the School of Law) or the department/division you work in (where applicable) and your age;
* ‘Special category’ personal data about you (this may include details about your race or ethnicity, religious or philosophical beliefs, sexual orientation, political opinions, trade union membership, information about your health etc.); and
* Detail regarding your experience of bullying, harassment and sexual misconduct.

We will also process the names and other details about third parties who are involved in the issues reported.

# Purposes for which we process your personal data and the legal bases for processing

The main purposes for which we process your personal data in respect of both named and anonymous reports are set out in further detail below.   
  
Data protection laws require us to meet certain conditions before we are allowed to use your data in the manner described in this notice, including having a "legal basis" for the processing. Where we process special category personal data, we are required to establish an additional legal basis for processing that data.  
  
We take our responsibilities under data protection laws extremely seriously, including meeting these conditions. The main legal bases on which your personal data are generally processed in relation to the Report and Support Services forms are also explained in the section below:  
   
**Purpose / Legitimate interest**

Reviewing and processing a report and, where appropriate, sharing your personal data with third party controllers (such as passing your data on to the police, if relevant) or passing it on to the appropriate department within Bloomsbury Institute.

Bloomsbury Institute only processes personal data for the specific purposes at the point of collection. In this case, for the purposes of reviewing and processing a report and, where appropriate, sharing your personal data with third party controllers (such as passing your data on to the police, if relevant) or passing it on to the appropriate department within Bloomsbury Institute.

Should the Institute need to use the data for a different and unrelated purpose, the data subject will be informed before any processing takes place. In some cases, consent of the data subject may be required."

**Legal Basis**

***Performance of a contract***

Where a report is made by or about a Bloomsbury Institute member of staff or student, we may process personal data in order to fulfil our obligations under our contract with that staff member or student.

**For special category data**

***Equality of opportunity or treatment***

We process certain types of special category data in order to monitor equality of opportunity/treatment and ensure that no one receives less favourable treatment on the basis of their protected characteristics, in line with the Equality Act 2010.

***Employment law obligations***

We process certain special category data so that we can meet our obligations in the field of employment law, where this is necessary.

***Statutory and government purposes***

We may process special category data in order to fulfil our duties under the Equality Act 2010.

***Safeguarding of children and of individuals at risk***

We may process special category data in order to safeguard children or individuals at risk.

***Preventing or detecting unlawful acts***

We may process special category data in order to prevent or detect an unlawful act.

***Establishment, exercise or defence of legal claims***

It may be necessary to process your special category personal data in relation to establishing, exercising or defending legal claims.

***Consent***

Where we are relying on a legal basis to process your special category personal data that is not listed in this section, we will inform you of the legal basis before we start processing your special category personal data based on that legal ground.

Where we cannot rely upon an appropriate legal basis, we will require your consent to the processing of your special category personal data when reviewing and processing that report and sharing your special category data with a member of staff or third party.

**For criminal convictions data**

This privacy notice makes it clear that criminal convictions data should not be included in reports. Nevertheless, if this guidance is not followed, there are circumstances in which criminal convictions data included in a report would be passed to the relevant department within Bloomsbury Institute. We may then rely on the legal bases set out below when reviewing and passing on such information.  

Where we are relying on a legal basis other than those set out below in processing your criminal convictions data, we will inform you of the legal basis before we start processing your criminal convictions data.

***Regulatory requirements relating to unlawful acts and dishonesty***

We may process your criminal convictions data in order to assist a third party to comply with a regulatory requirement that requires the taking of steps to establish whether another person has: (i) committed an unlawful act, or (ii) been involved in dishonesty, malpractice or other seriously improper conduct do so. 

***Safeguarding of children and of individuals at risk***

We may process your criminal convictions data in order to safeguard children or individuals at risk. 

***Protecting the public against dishonesty***

We may process your criminal convictions data in order to protect the public against dishonesty, malpractice or other seriously improper conduct; and unfitness or incompetence.

***Employment law obligations***

We will only process criminal convictions information where this is necessary so that we can meet our obligations in the field of employment law.

# Third parties with whom we may share your personal data

***Third party service providers***  
In the context of the Report and Support Services disclosure forms, your data will be shared with Jisc which is a third-party service provider that enables us to provide our reporting forms. Please see Jisc’s Surveys security information [here](https://www.onlinesurveys.ac.uk/security/) for further information on the security measures adopted by Jisc, which are designed to help keep personal data secure.   
  
***The police/social care services/local authorities/other similar bodies***  
There are certain circumstances in which Bloomsbury Institute may provide information about the matters raised in a report, including personal data, to third parties such as the police and social care services. This may include providing personal data about you without your consent. Our Duty of Care Guidance sets out how personal data may be shared in the following circumstances:

* An allegation about behaviour by a staff member or student towards a student who is under the age of 18;
* An allegation about behaviour by a staff member or student towards an adult at risk; or
* An allegation about behaviour by a staff member or student towards another staff member or student over the age of 18.

***Our consultants and professional advisors***  
  
Depending on the circumstances, we may need to share details of reports made with our consultants and other professional advisors, such as solicitors.  
  
***Courts and tribunals***  
  
In the event that a report results in legal proceedings being issued, we may share personal data with the relevant courts and tribunals.  
  
***Data subject access requests***  
  
As outlined in the confidentiality note, personal data included in a report, including an anonymous report – and any subsequent documentation and correspondence – may be disclosed by Bloomsbury Institute in response to a 'subject access request' ("SAR"). This is where the individual to whom the personal data relates exercises their right under data protection law to request a copy of their personal data, in addition to information about how and why that personal data is being used. A SAR may be made by the person who submitted the report, the individual to whom the complaint relates, or by a third party who is referred to in the report.  
  
Bloomsbury Institute’s [Data Protection and Confidentiality Policy](https://www.bil.ac.uk/qem/section-3/) provides information as to how SARs are dealt with. Please note that when responding to a SAR relating to a report – whether named or anonymous – Bloomsbury Institute will uphold its confidentiality obligations in respect of the report, subject to certain limitations as set out in the Confidentiality Note.   
  
Under data protection law, Bloomsbury Institute is not obliged to comply with a SAR if this would mean disclosing information about another individual who can be identified from that information, unless either: (i) the other individual has consented to the disclosure; or (ii) it is reasonable to comply with the request without that individual's consent. When determining whether it is reasonable to disclose the information, we will take into account factors including: (i) the type of information that would be disclosed; (ii) any duty of confidentiality owed to the other individual; and (iii) any express refusal of consent by the other individual.  
  
Given the nature of a report made using the Report and Support Services forms and the confidentiality obligations owed to individuals in this context – including where an anonymous report has been made – we will endeavour to avoid disclosing personal information other than that of the individual who submitted the SAR, unless explicit consent to the disclosure is given by other relevant individuals.

Nevertheless, as outlined in the Confidentiality Note, even in the case of anonymous reports, there may be circumstances in which the disclosure of personal data from a report and/or associated documentation or correspondence in response to a SAR may enable the requester to determine the identity of the person who made the report, e.g. if a specific event or incident has been referred to. In such circumstances, we will consider our response carefully and will endeavour to balance the requester's right under data protection law to receive their information, against our confidentiality obligations.   
  
***Further information***  
  
Note that the list of third parties in this section is not exhaustive – data may also be shared in accordance with policies listed at section 1 above, as applicable.  
  
Please see our separate Duty of Care Guidance for further information on the third parties with whom information may be shared in the above circumstances, including the police and/or social care services (as appropriate).  
  
Please also see the Confidentiality Note for further information on the circumstances in which Bloomsbury Institute may be required to share your information with third parties.

# Transfers outside the European Economic Area

We do not transfer your personal data outside the European Economic Area (**EEA**) in relation to the Report and Support Services forms.

# Information security

We have put in place appropriate security measures to prevent your personal data from being accidentally lost, used or accessed in an unauthorised way, altered or disclosed. We have established procedures to deal with any suspected personal data breach and will notify you and any applicable regulator of a breach where we are legally required to do so.

# Retention periods

We will only retain your personal data for as long as necessary to fulfil the purposes we collected it for, including for the purposes of satisfying any legal, accounting, or reporting requirements.  
   
We will keep records of all reports, both anonymous and named, for one year from case closure within our own secure network system. All personal data will be kept according to our Records Retention Schedule within our [Records Management Policy](https://www.bil.ac.uk/qem/section-3/).  
  
We may retain some anonymised information in order to monitor our work in this area but you will not be identifiable from this information.

# Your rights

You have the following rights in relation to your personal data:

* **Right 1:** A right to access personal data held by us about you.
* **Right 2:**A right to require us to rectify any inaccurate personal data held by us about you.
* **Right 3:** A right to require us to erase personal data held by us about you.  This right will only apply where, for example, we no longer need to use the personal data to achieve the purpose we collected it for; or where you withdraw your consent if we are using your personal data based on your consent; or where you object to the way we process your data (in line with Right 6 below).
* **Right 4:** A right to restrict our processing of personal data held by us about you.  This right will only apply where, for example, you dispute the accuracy of the personal data held by us; or where you would have the right to require us to erase the personal data but would prefer that our processing is restricted instead; or where we no longer need to use the personal data to achieve the purpose we collected it for, but we require the data for the purposes of dealing with legal claims.
* **Right 5:** A right to receive personal data, which you have provided to us, in a structured, commonly used and machine-readable format. You also have the right to require us to transfer this personal data to another organisation.
* **Right 6:**A right to object to our processing of personal data held by us about you.
* **Right 7:** A right to withdraw your consent, where we are relying on it to use your personal data. Note that a withdrawal of consent will not affect the lawfulness of processing based on consent before its withdrawal. However, a withdrawal of consent may prevent us from reviewing and processing a report, and/or from taking further action based upon that report.
* **Right 8:** A right to ask us not to use information about you in a way that allows computers to make decisions about you and ask us to stop.

In certain circumstances, we may need to restrict your rights in order to safeguard the public interest (e.g. the prevention or detection of crime) and our interests (e.g. the maintenance of legal privilege).  
  
If you wish to exercise any of the above rights, please contact us using the details set out at section 14 below.

# Automated processing

In the context of Report and Support Services disclosures, Bloomsbury Institute does not use automated processing and decision making without manual intervention in relation to data received.

# Who regulates the use of my personal information?

Bloomsbury Institute maintains a data protection registration with the Information Commissioner's Office, the independent authority which oversees compliance with the data protection laws. Our registration number is Z1082474 and this registration sets out, in very general terms, the full range of purposes for which we use student, staff and all other personal information. Please see the Information Commissioner's Office [website](https://ico.org.uk/) for details.

# Who do I contact with questions?

If you have any questions about your personal data and Bloomsbury Institute that are not answered by this privacy notice, then please consult our [Data Protection and Confidentiality Policy](https://www.bil.ac.uk/qem/section-3/).  
  
If you need further assistance, please contact our Data Protection Officer: dpo@bil.ac.uk.   
  
If we are unable to adequately address any concerns you may have about the way in which we use your personal data, you have the right to lodge a formal complaint with the UK Information Commissioner's Office. Full details may be accessed on the complaints section of the Information Commissioner's Office website - <https://ico.org.uk/make-a-complaint/>.

# Review

This is Version 1 of the Report and Support Services - Privacy Notice: last updated 2 July 2025. This document will be reviewed annually.