Equality Analysis

Name of policy /process	Campus Security Code of Conduct
Owner of change	Mark Arnold Head of Security
Equality Analysis completed by	Mark Arnold / Becky Lamyman
Date of Equality Analysis	26.11.20

1. What is the purpose of the policy/process and the rationale for change?

Following representations made by students from 8 BME societies under the Statement of Solidarity and Call to Action to the University of Kent https://medium.com/@afrodiasporiclegalnetwork/bme-societies-submit-a-statement-of-solidarity-demands-to-the-university-of-kent-a353c351e9df, Campus Security consulted and published a Charter and a Code of Conduct.

The Campus Security Charter was a new document based upon the University of Kent Student Charter 2017 and will form part of this document when it is updated.

The Code of Conduct was a new document. This is an amalgam into one easy reference document of various legal responsibilities, current contractual duties, University policies, procedures, and Campus Security protocols that already apply to Campus Security.

Both documents can be found at:
https://www.kent.ac.uk/estates/services/security/charter_code_conduct.html

The Code of Conduct is not meant to be the totality of absolutely everything that applies to Campus Security staff but a guide to key expectations, which can easily be followed.

As part of the original representations and other comments raised in subsequent meetings, were concerns about students being disproportionately targeted to produce identification because of their ethnicity. There was also a request to re-examine the circumstances when students are required to prove identification.

In order to reassure all students about Campus Security requesting identification, the Head of Security researched best practice from a number of areas including Crown Prosecution Service, College of Policing and Association of University Chief Security Officers.

A number of exemplar operational situations were documented and a standardised protocol put in place with key points being:

- Any action must be lawful and legal.
- Abide by University policies and procedures and specifically stated are the Equality, Diversity and Inclusivity (EDI) policy and Dignity at Work Policy.
- Any request will be impartial.
- For a specific objective.
- Based on facts.
- Campus Security will not consciously use a request in an unfair or discriminatory way and will be mindful of the potential influence of unconscious (implicit) bias on their decision-making.
- People are more likely to be satisfied with a request when they believe there is a good and credible reason for the encounter and do not feel unfairly targeted.

If a Campus Security staff member decides that there is a genuine reason based upon information or facts and there is an immediate necessity to request identification they will:

1. Identify themselves as being Campus Security and their call sign.
2. Give a reason and the objective for the request. In simple terms why and what it will achieve.
3. Formally request identity of the person(s).
4. Make an entry into Pocket Note Book with any response(s).
5. Update ISARR incident record or have one created as an electronic record of the interaction.
6. Inform the person(s) that there will be a record made of the request for their identity on the Campus Security incident management system and they can apply for a redacted copy of the incident record containing the request for their identity via the University Data Protection Dept. dataprotection@kent.ac.uk . This will ensure an audit trail of any requests and of any disclosure.
7. Document perceived ethnicity of person(s) being requested as a general descriptor as part of the description of the person(s) involved using the 6+1 Visual Assessment Ethnicity Code:
   - IC1: White – Northern European.
   - IC2: White - South European e.g. Spanish, Italian, Greek.
   - IC3: Black - Afro-Caribbean, African or any other Black background.
   - IC4: Asian – Indian, Pakistani, Bangladeshi or any other Asian background.
   - IC5: Chinese, Japanese or other South East Asian.
   - IC6: Arabic or North African.
   - IC9: Unknown.
8. If the request for identification is declined, a decision will be made in conjunction with the Campus Security Duty Manager or Supervisor on the next course of action based upon the circumstances presented.
9. Consideration of the use of Body Worn Video will be in line with the existing Campus Security protocol.

Campus Security staff by:

1. Identifying themselves will facilitate dialogue with student(s) as well as allow the student to note who is dealing with them should they then wish to make a compliment or complaint.
2. Giving a reason and objective this will minimise misunderstanding about why the request has been made and allows student the opportunity to discuss or clarify any issues.
3. Making a formal request this removes any ambiguity over what is being requested.
4. Recording the response in their PNB will have an audit trail.
5. Recording the response on the incident record will have an audit trail.
6. Informing the student(s) of their right to request a redacted copy of the electronic incident record from the Data Protection Team will be reassured that this is being correctly and accurately recorded. Plus is available from a University Department not directly connected with Campus Security.
7. Recording the student(s) perceived ethnicity as part of the overall description of the student(s) involved, will avoid any inappropriate descriptors of a student(s) ethnicity or cultural heritage.
   This is **NOT** separately recorded on the incident record.
   However, any student identification number identified, will be recorded on the incident record so the University can carry out separate data monitoring of Campus Security interaction with students to identify any disproportionate activity, based upon the student(s) self-disclosed ethnicity and cultural heritage as well as any other relevant protected characteristic data
8. Referring back to the duty Campus Security Duty Manager or Supervisor if there is a dispute over identification can seek advice and any decision made again will be documented as part of the audit trail.
9. Considering the use of Body Worn Video can get a live-time recording of the interaction which can be sued in any investigation or resolution of complaints or for use in University student misconduct and complaint processes.

2. Is there likely to be any impact on staff and/or students relating to the protected characteristics:

Protected characteristic	Describe the nature of any impact (positive or negative) and how the impact of this has been addressed / considered
Age	There should be a positive impact as the considerations and explanations from points 1 to 9 are standardised throughout the Code of Conduct. The thought process is that this will more easily evidence Campus Security compliance or any non-compliance with University policy. This will also highlight any disproportionate targeting of student(s) from any of the protected characteristics groups including Age as there will be a record.

Disability	There should be a positive impact as the considerations and explanations from points 1 to 9 are standardised throughout the Code of Conduct. The thought process is that this will more easily evidence Campus Security compliance or any non-compliance with University policy. This will also highlight any disproportionate targeting of student(s) from any of the protected characteristics groups including Disability as there will be a record. Campus Security should be aware that students may have additional needs, both visible and invisible (e.g. physical needs including conditions relating to fatigue or mental health conditions) and consideration should be given to offering students the opportunity to complete their interaction in another environment, e.g. in privacy or with the option to sit down if it is anticipated that the interaction will take a longer time period than normal.
Gender reassignment	There should be a positive impact as the considerations and explanations from points 1 to 9 are standardised throughout the Code of Conduct. The thought process is that this will more easily evidence Campus Security compliance or any non-compliance with University policy. This will also highlight any disproportionate targeting of student(s) from any of the protected characteristics groups including Gender Reassignment as there will be a record. Campus Security should be aware that the name given by the student may not be the same as on the Student ID card. Students should be asked what their preferred name is that they should be addressed by in the interaction, and no assumptions should be made about the use of gendered pronouns or gender identity either in conversation or in the record kept by Campus Security. It is appropriate for Campus Security to ask the student what their preferred pronoun is and to use that.
Marriage and civil partnership	There should be a positive impact as the considerations and explanations from points 1 to 9 are standardised throughout the Code of Conduct. The thought process is that this will more easily evidence Campus Security compliance or any non-compliance with University policy. This will also highlight any disproportionate targeting of

	student(s) from any of the protected characteristics groups including Marriage and Civil Partnership as there will be a record.
Pregnancy and maternity	There should be a positive impact as the considerations and explanations from points 1 to 9 are standardised throughout the Code of Conduct. The thought process is that this will more easily evidence Campus Security compliance or any non-compliance with University policy. This will also highlight any disproportionate targeting of student(s) from any of the protected characteristics groups including Pregnancy and Maternity as there will be a record. Campus Security should be aware that any interactions with pregnant students should take into account any needs and requirements triggered by the pregnancy (including offering the student the option to sit down during the interaction). If a student has children with them, it may be necessary for the interaction to take place in an environment where the children can be monitored safely without the student being distracted by the interview.
Race	There should be a positive impact as the considerations and explanations from points 1 to 9 are standardised throughout the Code of Conduct. The thought process is that this will more easily evidence Campus Security compliance or any non-compliance with University policy. This will also highlight any disproportionate targeting of student(s) from any of the protected characteristics groups including Race as there will be a record. Campus Security should check the pronunciation of any names that they are unsure of with the student, and not make any assumptions about the racial identity based on appearance or name alone. Campus Security should be aware that students from BAME backgrounds are statistically more likely to be targeted by police and other authority figures in negative interactions and that can trigger feelings of cultural exhaustion which may impact an interaction.

Religion or belief	There should be a positive impact as the considerations and explanations from points 1 to 9 are standardised throughout the Code of Conduct. The thought process is that this will more easily evidence Campus Security compliance or any non-compliance with University policy. This will also highlight any disproportionate targeting of student(s) from any of the protected characteristics groups including Religion or Belief as there will be a record. Campus Security should be aware that some religions, particularly Orthodox Jewish (law of Negiah), prohibit contact between male and females and care should be taken to minimise this risk, particularly when handling Student ID cards (e.g. asking the student to show it rather than taking it from them would minimise the risk of contact).
Sex	There should be a positive impact as the considerations and explanations from points 1 to 9 are standardised throughout the Code of Conduct. The thought process is that this will more easily evidence Campus Security compliance or any non-compliance with University policy. This will also highlight any disproportionate targeting of student(s) from any of the protected characteristics groups including Sex as there will be a record.
Sexual Orientation	There should be a positive impact as the considerations and explanations from points 1 to 9 are standardised throughout the Code of Conduct. The thought process is that this will more easily evidence Campus Security compliance or any non-compliance with University policy. This will also highlight any disproportionate targeting of student(s) from any of the protected characteristics groups including Sexual Orientation as there will be a record.

Additional notes:

When students join the University of Kent, personal information is collected from the student that includes 'special category data' e.g. racial or ethnic origin, sexual orientation, religious belief etc. This ensures compliance monitoring under the Equality Act 2010 and by the Higher Education Statistics Agency (HESA).

The University's Planning & Business Information Office (PBIO) produces an annual report for review, which includes review by the Equality Diversity Inclusivity Group and the Safety & Conduct Group. This document is produced by also processing data based upon the students self-defined protected characteristic, ethnicity, cultural heritage etc. This then enables comparisons of data sets e.g. graduation outcomes for particular student groups including those of protected characteristics ethnicity, cultural heritage etc.

The Code of Conduct sets out to ensure that Campus Security actions are Lawful, Proportionate, Audited, Necessary and Ethical and is cognisant of the 'protected characteristics' under the Equality Act 2010.

In order to provide data for the PBIO on Campus Security interactions with students, including when identity is requested, Campus Security will record the students identity number on its incident record. This will enable data to be independently obtained, reviewed and produced as part of the University's annual report.

This will therefore highlight any trends, patterns, clusters, series or repeats of interactions etc. that would need further analysing, investigating, discussions and acting upon especially as it applies to any of the protected characteristic groups. This will allow the University to:

- Ensure it discharges its lawful duties under the Equalities Act.
- Equal opportunities monitoring.
- Facilitate review of security interactions with different protected characteristic groups.
- Compliance with its own policies including EDI.
- Help make reasonable adjustments for any disability.
- Compile statistics and conduct research for statutory reporting purposes.
- Enable the University's own research and statistical purposes.

It is acknowledged despite it being a requirement for a student to provide their identity when requested by a University staff member, that not all students currently or going forward, will give their identity number but this will always be best endeavour by the Campus Security to record the identity number to aid the PBIO data analysis and report.

Access to data contained within the Campus Security ISARR incident system is subject of GDPR and the incident system Privacy Notice.

If Body Worn Video cameras are used as part of the Code of Conduct procedures, the use; retention; processing and disposal of data is governed by the University CCTV policy and Privacy Notice.

Note: we have staff networks representing disability, BAME, women and LGBT+ available for consultation