

Prevent Policy

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Document Version Control

Document Version	Committee	Committee Action	Date
v1.0	SMLT	Approved by Chair's Action	29 May 2016
		Date in force	1 June 2016
v2.0	SMLT	Approved	1 March 2017
		Date in force	1 March 2017
v3.0	SMLT	Approved	21 February 2018
		Date in force	21 February 2018

The Prevent Policy will be reviewed annually by our Senior Management and Leadership Team (SMLT). Any amendments require the approval of our Senior Management and Leadership Team.

1. Introduction

Under the Counter-Terrorism and Security Act 2015, we are required to 'have due regard to the need to prevent people from being drawn into terrorism'. The way in which we need to comply with the Counter-Terrorism and Security Act 2015 is set out in the *Prevent Duty Guidance for higher education institutions in England and Wales* which came into effect on 18 September 2015. Prevent works within a non-criminal space, using early engagement to encourage individuals and communities to challenge violent extremist ideologies and behaviours. We therefore view and would encourage our students and staff to view Prevent as a safeguarding exercise aimed at preserving the well-being of our academic community.

Prevent is part of a broader counter-extremism strategy known as Contest. Contest has the following four strands:

- **Pursue:** to stop terrorist attacks;
- **Prevent:** to stop people becoming terrorists or supporting terrorism;
- **Protect:** to strengthen our protection against a terrorist attack;
- **Prepare:** to mitigate the impact of a terrorist attack.

Our Prevent duties are currently shared in part with our partner institutions: the University of Northampton (our academic partner), Birkbeck College (our supplier of classroom, social space, and library facilities) and Student Central (which provides Student Union facilities to our students, but which is NOT a student union under the terms of the Prevent Duty Guidance operating instead as a Department of the University of London).

2. Definitions

The following definitions come from HM Government Prevent Strategy 2011.

Radicalisation is defined as the process by which people come to support terrorism and extremism and, in some cases, to then participate in terrorist activity.

Extremism is vocal or active opposition to fundamental British values including democracy, the rule of law, individual liberty and mutual respect and tolerance of different faiths and beliefs.

Terrorism is an act that endangers or causes serious violence to a person/people, causes serious damage to property, or seriously interferes or disrupts an electronic system. The use or threat must be designed to influence the government or to intimidate the public and is made for the purpose of advancing a political, religious or ideological cause. Terrorism is not confined simply to acts of violence, it extends also to non-violent acts. Non-violent terrorism takes the form of popularising views which terrorists exploit. Obvious terrorist groups include Islamist extremists and white supremacists.

3. Scope

Our Prevent Policy applies to all staff at the London School of Business and Management (LSBM) and (where relevant) all students.

4. Our approach

We believe that our obligations under the Prevent Guidance offer an opportunity to consolidate the duty of care we have already set out in our existing Safeguarding Policy and general welfare procedures. Our approach is very much determined by the focus we place on the safety and well-being of individuals and is in line with our Servant Leadership Philosophy. Safeguarding our students and staff from radicalisation or terrorism is no different from protecting them from any other forms of harm.

Guided by our commitment to the ethos of Servant Leadership and our Equality, Diversity and Inclusion Policy which explicitly recognises the importance of inclusion in order to mitigate the risk of radicalisation, we feel that we have created the community cohesion that lies at the heart of Prevent. Indeed, our Equality, Diversity and Inclusion Team (EDIT) plays a very active part in promoting and celebrating as many multicultural events as possible in order to foster a real sense of community. For example, major religious festivals are marked in our Student Success Hub and we periodically celebrate our diverse cultural backgrounds through the sharing of food, music and stories.

We believe that the more open and equal a society or environment we create, the less likely it is for students or staff to go down the radical path. We recognise that failure to include students and staff can marginalise them and lead to radicalisation. We also believe that we can develop resilience to extremism through education and debate. In the case of our students, helping them to develop critical thinking skills, we are able to provide them with an important tool against the risk of radicalisation and possible terrorism.

Our *Encourage* programme celebrates and promotes the role of critical thinking in human relations. *Encourage* exposes both students and staff to the history of critical engagement in the world, from Plato to the present day. Critical thinking is an important aspect of our Servant Leadership corporate ethos and it is our stated aim to present the art of critical thinking as a compelling narrative to our students, highlighting its ability to change society and deliver justice and equity in our world. The content of our Encourage programme has been put together by our Centre for Student Engagement, Wellbeing and Success, and, following the launch of a pilot programme in February and March 2017, has been rolled out across our Foundation Year programme in academic year 2017-18.

In view of the above, we welcome the recognition given in the Prevent Duty Guidance to the importance of individual institutions taking a proportionate and risk-based approach to meeting their Prevent obligations.

5. Leadership

Our Academic Principal and our Head of Quality (who acts as our Prevent Lead) have ultimate responsibility for compliance with the Duty to prevent people from being drawn into terrorism. They are supported, however, by our Senior Management and Leadership Team (SMLT) who provide oversight of Prevent duties in terms of approving and amending Prevent policy and procedural documents, and receiving risk assessments.

Our Board of Directors has ultimate responsibility for ensuring compliance with the Prevent duty. These responsibilities are set out in our Corporate and Academic Governance Framework (CAGF) which is reviewed on an annual basis, and included also in our Directors' Induction Programme.

6. Risk assessment

The risk of radicalisation or extremism is one of the risks included within our Corporate Risk Register. This register is maintained by the Academic Principal and is reviewed and approved by our Senior Management and Leadership Team (SMLT) on a three-monthly basis - March, June, September and December - prior to approval by our Board of Directors who have responsibility for approving, amending and monitoring the Register. However, ad hoc reviews can be conducted by the SMLT at any time in the event of organisational change or a likely or specific threat occurring.¹

The Head of Quality is responsible for carrying out Prevent-related risk assessments which are considered for approval by the SMLT and Board of Directors.

¹ The Senior Management and Leadership Team meets on a monthly basis, but extraordinary meetings can be called at any time.

7. Responsibilities

Primary responsibility for student welfare or pastoral support lies with our Centre for Student Engagement, Wellbeing and Success (SEWS) in the form of our Student Success Advisors and our Disability and Wellbeing Advisor as well as with our staff Success Champions who front our Personal Advice Network. Given that we firmly believe that Prevent is an extension of our Safeguarding Policy and procedures, it is appropriate that our Centre for Student Engagement, Wellbeing and Success and our Success Champions assume front-line ownership of our Prevent obligations. It is also appropriate that the Director SEWS is the point of contact for any safeguarding referrals raised by his SEWS team, Success Champions or other third parties. Upon investigation, if the Director of SEWS decides that the concern is Prevent-related, he will refer the matter to the Head of Quality. The Head of Quality will investigate further (if need be) and make a decision regarding appropriate actions.

8. Training

Compulsory Prevent awareness training covering the following areas is incorporated within our Continuing Professional Development Programme for all staff:

- institutional and individual responsibilities
- how to recognise vulnerability to being drawn into terrorism
- understanding what draws people to terrorist ideologies or terrorist-related activities
- how to respond to any concerns in terms of knowing where to get advice and support
- knowing when to make referrals to the Channel Programme or, in more serious cases, to the Police.

Staff with leadership and “front-line” responsibilities (i.e. the Student Engagement, Wellbeing and Success team, and Success Champions) are given priority access to training. Coverage of our institutional Prevent obligations is included in all Staff Inductions and our Staff Handbook. In addition, this policy document is available from Part D of our online Quality and Enhancement Manual which is flagged to all staff and students at Induction.

9. Causes for concern

We have a duty of care to identify, protect and support a student or staff member who may be at risk of radicalisation or who may, indeed, have already been radicalised. This duty of care extends both to the individual concerned and to the wider community. It is crucial therefore that when addressing any concerns that you or a third party might have, you bear in mind the need for factual evidence: either your own observations of what an individual might have said or how an individual might be behaving, or information disclosed to you by a third party e.g. an individual’s friends, peers or tutors. Assumptions should not be made.

There is no definitive checklist of signs of radicalisation. However, some typical indicators of an individual who may be a cause for concern in the context of radicalisation or, indeed, any number of other scenarios (e.g. mental health issues, domestic abuse, alcohol or drug abuse) include significant changes in:

- Levels of engagement. The individual may go missing without notice or begin to attend erratically.
- Performance. Standards or patterns of work may deteriorate significantly. The individual might start to miss deadlines or meetings in contrast to previous performance.
- Appearance. The individual may begin to dress in a significantly different manner.

- The way an individual sounds or speaks. The individual may suddenly become very quiet or very loud, or become very agitated.
- Mood. The individual's mood may differ from what is usual for them.
- Behaviour. The individual may begin to behave in a very unusual, hostile or aggressive manner.
- Interests and views. The individual may take an interest in and express radical views or express sympathy for those who uphold radical views.

Other possible contextual indicators include

- Family tensions resulting in a sense of isolation.
- A sense of isolation as a result of feeling or being treated differently.
- Migration. Living and studying or working in a different country.
- Distance from cultural heritage. Not feeling comfortable in their surroundings resulting in an identity crisis.
- Experience of racism or discrimination resulting in a sense of grievance.
- Feeling of failure. Unmet aspirations.
- Criminality. A time in prison. Previous involvement with criminal groups.

Although you may feel that the concern you have is relatively small and possibly isolated, you are encouraged to share it with the Director of SEWS because others may have already shared similar concerns and when considered together, these multiple concerns could present a very compelling argument for either safeguarding intervention of a general nature or intervention by the Head of Quality if there is a suggestion that it is a Prevent-related matter. The Director of SEWS will record any concerns and action taken in our Safeguarding Referral Form, as will the Head of Quality if any issues are referred on to her by the Director of SEWS. See *Appendix B*. The completed forms and any accompanying evidential documents will be stored by the owners in a secure site (be it in electronic or hard copy format).

10. Referral of concerns regarding radicalisation

We, as an institution, have a duty to refer anyone suspected of being engaged in illegal terrorist activity to the Channel Programme or, in more serious cases, to the Police, and to prevent people being drawn into terrorism. We also have the option of discussing any concerns we might have with a number of experts in this area. See Section 12 on Channel. However, we have to balance our duty here with a commitment to freedom of speech and the requirements of legislation such as the Data Protection Act and the Equality Act 2010. See *Appendix A* for details of the legislative framework within which we are required to operate. The Head of Quality, in her role as Prevent Lead, is ultimately responsible for making the above judgement.

The Head of Quality is also responsible for determining whether any concerns raised are serious enough to warrant a referral and, if they are, the body or agency to which the referral should be made. The Head of Quality will make the decision based on evidence gathered following any safeguarding referral of a Prevent nature by the Director of SEWS.

It is important to remember that any concerns regarding a student or staff member should be treated with discretion. Information about the individual concerned should only be shared on a "need to know" basis with due regard to the Data Protection Act.

See *Appendix C* for summary details of the referral process.

11. Partnerships

Our Local Authority - Camden Council - has a Home Office funded Prevent Co-ordinator whose role is to manage the existing local programme of preventing extremism activities with access to Home Office local delivery funding for specific projects. Camden's Prevent Delivery Plan, including an annual work programme for preventing extremism, is governed by the Camden Community Safety Partnership. Existing priorities include raising awareness of Prevent and Channel through briefings and training; supporting vulnerable individuals through multi-agency support provided through Channel; and specific community projects to build community resilience.

We also have a Regional Prevent Co-ordinator and Prevent contacts within our partner institutions, namely Birkbeck College and the University of Northampton. These contact details are maintained by the Head of Quality.

12. Channel

Channel is an early intervention process designed to safeguard vulnerable people from being drawn into violent extremist or terrorist behaviour. Involved in the process are a range of multi-agency partners² which form part of a Panel chaired by the relevant local authority. Each Channel Panel is tasked with assessing the risk an individual might pose together with the support package needed for that individual. Each support package is tailored to the individual and his/her particular vulnerabilities. These may be in relation to health, education, employment, housing or faith guidance, for example.

Engagement with Channel is voluntary and so the consent of the individual concerned is required. The Head of Quality can seek advice around Channel from the Senior Policy Officer at Camden Council, the Channel Police Practitioner for North West London, the local Policing Team, and the London Regional Prevent Co-ordinator. Contact details for these have been included in our Prevent Referral Process document.

13. Ways of mitigating risks

There are a number of ways of mitigating risks which enhance and augment our work of creating an equal, inclusive and supportive environment, ensuring staff awareness and establishing information sharing mechanisms both internal and external. These include the following:

13.1 Management of External Speakers and Events

Our risk-based approach to complying with our Prevent duties can be seen in the way in which we balance the need for freedom of speech and academic freedom with our obligation to ensure the welfare of our staff and students. This approach is set out in our External Speaker Policy which outlines the procedures we have in place for assessing risk in order to ensure that we do not unwittingly provide a platform for radicalisation and terrorism.

We have a formal procedure in place for seeking approval of an event at which an external speaker is to be invited. This involves completion of an External Speaker Request Form³ by the event organiser and due diligence checks by the Head of Quality. In addition, the external speaker is required to abide by our policies in this area and, where appropriate, sign our External Speaker Assent Form. If the Head of Quality has any doubt about potential risks or where the Head of Quality deems any potential risks as being medium or high, the Head of Quality will discuss the Request Form with the Academic Principal and Managing Director. If they judge that (a) there is a risk of the speaker expressing extremist views

² Social Care, Police, Health, Education, Probation, Housing, Youth Offending Service.

³ Available from the Head of Quality.

that risk drawing people into terrorism and that (b) we are unable to mitigate that risk⁴ by ensuring that opposing views are expressed, we would cancel the event. We would also cancel the event if we were in any doubt about whether or not we could fully mitigate the risk.

13.2 IT policies

Staff and students using LSBM PCs are subject to our institutional ICT policies which include an Email Acceptable Use Policy and an Internet Acceptable Use Policy. These policies address both Prevent and equality, diversity and inclusion issues.

13.3 Social media

Our Information Control Procedures set out the internal procedures we have in place to ensure that all our institutional communications are accurate and (where applicable) that there is compliance with relevant legislative provisions. The Information Control Procedures also cover the use of online content and the regular audit of such content. These areas are also explored and regulated in our Social Media Communications Policy.

Our Content Management Relationship Executive (CRM Executive) is responsible for posting information to students and prospective students on social media sites and is able to authorise other staff to post information. Social media communications are subject to a periodic audit by our Head of Student Recruitment and Marketing.

Our CRM Executive is also responsible for monitoring our social media accounts on a regular basis. In line with our Prevent duties, if one of our students or external stakeholders were to post a comment on one of our social media accounts that could be deemed to be offensive or have the potential to “radicalise” others, then the comment would be removed and the contact would be blocked. The CRM Executive is responsible for reporting any such incidents to our Head of Quality.

13.4 Branding

LSBM is currently engaged in a rebranding project which will lead to the launch of a new brand, website and name in late 2018.

However, as it stands, our Information Control Procedures make it clear that there are only a limited number of personnel who have authority to publish or change content available to the general public. It is, therefore, easy for us to control brand consistency.

We appointed a Graphic Designer in late 2017, and also have a Media and Content Manager, who manages written content in our website and external publications.

We do very little work now with any marketing agencies and thus have greater control to keep our branding and messaging consistent.

14. Ethics Committee

Our teaching is currently largely curriculum-based and so opportunities for research are relatively limited. However, any student or staff member wishing to embark on a research project would need to follow the Ethics Procedures of our academic partner, the University of Northampton, and complete our own Research Ethics Approval Form. The latter reflects our Prevent duties by including reference to students and staff who have a *legitimate* need to access groups or materials that may be construed as terrorist or extremist. In this way, we are able to provide students and staff with a safe space in which to pursue their legitimate research interests.

⁴ The ways in which we are able to mitigate risks are set out fully in our External Speaker Policy.

15. Gender segregation

We are committed to promoting a general culture of equality, diversity and inclusion throughout our staff and student community. Our responsibilities in this respect are set out in our Equality, Diversity and Inclusion Policy which, in turn, is determined by our obligations under the Equality Act 2010. In line with these obligations, we will not allow organised segregation of any form at lectures, seminars, meetings or events of any kind. The only exception we would make to this ruling would be in the case of collective religious worship or observance. Instead we support the right of people to sit or stand in any particular groupings that they choose to form.

16. Review of the Prevent Policy

Our Prevent Policy will be subject to formal review by the Head of Quality on an annual basis unless risk factors change or a situation presents itself that warrants an immediate review. In the case of the latter any amended documents will be submitted at an emergency meeting of our Senior Management and Leadership Team.

17. Related regulations, policies and procedures

London School of Business and Management

- Safeguarding Policy
 - Safeguarding Referral Form
 - Safeguarding Referral Process
- Equality, Diversity and Inclusion Policy
- External Speaker Policy
 - External Speaker Request Form
 - External Speaker Assent Form
- Internet: Acceptable Use Policy
- Email: Acceptable Use Policy
- Social Media Communications Policy

Appendix A: The Legislative Framework for our Prevent Policy

The following list is not exhaustive.

- Computer Misuse Act (1990)
- Communications Act 2003
- Copyright, Designs and Patents Act 1988
- Counter-Terrorism and Security Act 2015
- Criminal Justice and Immigration Act 2008
- Criminal Justice and Public Order Act 1994
- Data Protection Act (1998)
- Education [No 2] Act 1986
- Equality Act 2010
- Freedom of Information Act (2000)
- Higher Education Act 2004 covering Academic Freedom
- Human Rights Act (1998)
- Malicious Communications Act 1988
- Obscene Publications Act 1959
- Offences against the Person Act 1861
- PREVENT Duty Guidance for Higher Education Institutions in England and Wales (2015)
- Protection from Harassment Act 1997
- Public Meeting Act 1908
- Public Order Act 1986
- Regulation of Investigatory Powers Act (2000)
- Terrorism Acts 2000 and 2006

Appendix B: Safeguarding Referral Form

CONFIDENTIAL

Safeguarding Referral Form

Section A: Personal details of the person about whom there is a safeguarding concern

Name	
Date of Birth	
Job Role or Student Number (if relevant)	
Address	
Telephone Number	
Email Address	

Section B: Person reporting the incident/concern

Name	
Job role or student number as applicable	
Telephone Number	
Email Address	
Relationship to student or staff member	

Section C: Reasons for Referral

Outline the reasons for the referral

Section D: Action Taken

Outline any action taken (and by whom) prior to referral of the incident or concern

Detail any conversations that have taken place with the individual concerned regarding the above, indicating who has been involved in those discussions.

Section E: Other staff informed

Name(s)	
Position	

Name(s)	
Position	

Name(s)	
Position	

Section F: External partners informed

Name	
Position/Organisation	
Contact details	

Section G: Form completed by

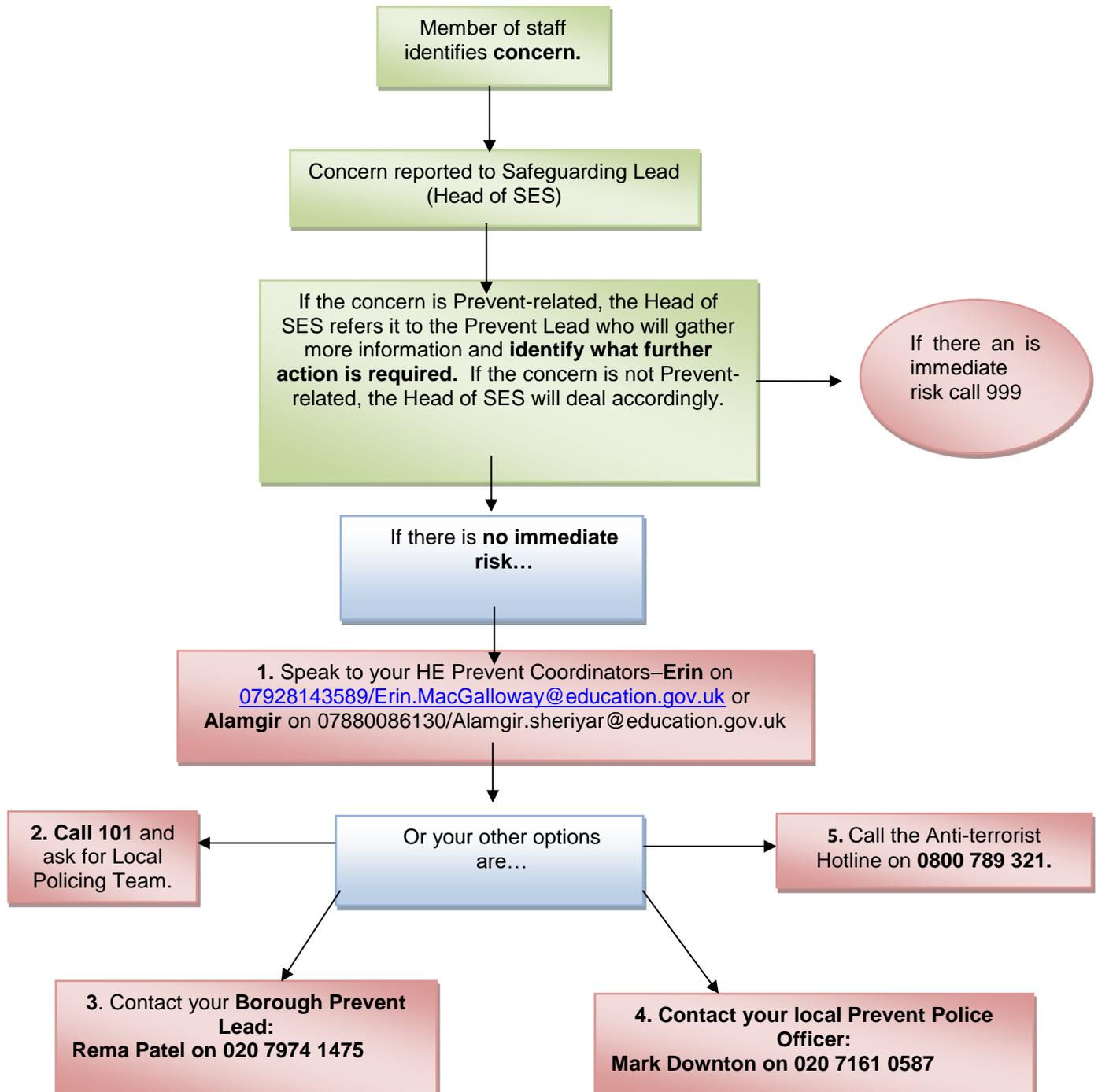
Name	
Signed	
Date	

CARE: This information is confidential and should only be shared on a “need to know basis” if it will protect the individual about whom the safeguarding concern has been expressed or if it will protect those around the aforementioned individual.

Appendix C: Prevent and Channel Referral Process

Process map for reporting a concern of a vulnerable individual

It is important for you as a member of staff to know where to go if you have a concern that someone may be on the route to radicalisation. Below is a flow chart which aims to show the process to be followed:



Once a referral has been made and enters the Channel process, the below process map illustrates what happens next...

