



Prevent Policy

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1. Purpose

- 1.1. This Policy meets responsibilities placed on the College to meet current legislation in the national 'Prevent Strategy'. The College recognises its duty of care to students and staff and its legal responsibility to comply with this legislation introduced in Autumn 2015. The aim of the Prevent Strategy is to reduce the threat to the UK from terrorism by stopping people becoming terrorists or supporting terrorism. The legislation defines extremism as '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. We also include in our definition of extremism calls for death for members of the armed forces'. The College adopts this definition for purposes of implementing guidelines, recognising that these are values and concepts which are rightly the subject of debate and consideration in universities and Colleges.
- 1.2. As a 'Relevant Higher Education Body', the College has policies and procedures in place which are not directed at any specific religion, religious group or at the proponents of any other set of beliefs. The College's aim is to be able to monitor, manage and deal effectively with the Prevent Strategy in respect of any individual being drawn into violent extremism and eventually terrorism.

2. Principles

- 2.1. This Policy sets out the principles of the College's Prevent Risk Assessment and Action Plan, which is resourced by the Prevent Risk Register.
 - 2.1.1. It outlines the partnerships between the College and key partners in ensuring compliance and delivering of the Prevent Duty;
 - 2.1.2. It outlines guidance for training of the necessary staff and student in relation to the Prevent Duty;
 - 2.1.3. The policy sets out expectations of the student body and its connected activities in delivering the Prevent Duty and makes clear the need to challenge extremist ideas which risk drawing people into terrorism;
 - 2.1.4. It provides clear guidance of the referral procedure and establishes a single point of contact for operation of Prevent related activity.
 - 2.1.5. The policy sets out permissible activity on College sites and in the use of College IT equipment.

3. Risk Assessment

3.1. Risk Register

- 3.1.1. The College deploys a Corporate Risk Register and has created a separate specific risk relating to the Prevent Duty. The College's Corporate Risk Register includes as a specific element, the duties in preventing people drawn to terrorism and the risk of radicalisation. The Principal's Executive Group (PEG) monitors activities of the Prevent Risk Register and Corporate Risk Register and actions taken to mitigate risks described in the Risk



Assessment and Action Plan are considered on a regular basis and reported to the Board of Directors and College Oversight Board.

- 3.1.2. The College has completed a Prevent risk assessment to review where and how students/staff might be at risk or drawn into terrorism or extremist groups, identifying actions to be taken and measures already in place. The avenues of radicalisation include:

3.2. External Factors

- 3.2.1. Students / staff being exposed to extremist views whilst at College, or on College / HE related activities in London; Staff / students becoming radicalised through off-site methods.

3.3. College sites

- 3.3.1. Risk of students / staff producing materials or consuming materials of an inappropriate nature on or around College sites; involving space management practices, managing risk and external speakers to LCC sites.

3.4. ICT Factors

- 3.4.1. Students or staff accessing extreme material on College systems.

4. Action Plan

4.1. Prevent Steering Group

- 4.1.1. A Prevent Steering Group (PSG) has been established as an *ad hoc* group reporting to the Principal's Executive Group (PEG), to address all Prevent Duty related issues and ensure legal compliance. It is chaired by the Principal and includes the Head of Quality Assurance and Senior Quality Assurance Officer. It receives administrative support from the Registrar and the Executive Assistant. The group is responsible for overseeing the Risk Assessment and Action Plan to address threats and mitigate risks. The Risk Assessment and Action Plan is reviewed and monitored by the PSG with advice from the Prevent HE/FE Co-ordinator. Regular reporting of progress on the Risk Assessment and Action Plan is made to PEG by the Chair or nominated other.

5. Partnership

- 5.1. The College's PEG is also strengthening the College's links with the local FE/HE Prevent Co-ordinators (particularly Newham, Barking and Dagenham) and developing clear communication working with a partnership approach to Prevent and associated counter-terrorism issues in all campuses. Specifically:

- 5.1.1. In respect of student recruitment all brand ambassadors / agents are expected to follow the College's Prevent practices to meet the Prevent agenda and report any concerns to the College.



- 5.1.2. Placement and providers of work-related settings are expected to follow the governments' counter-terrorism strategy, 'CONTEST' and report any concerns to the College and relevant external bodies.
- 5.1.3. In engaging with professional bodies we anticipate that they have guidelines and duties in place with which they expect to adhere, but in addition they are expected to raise any concerns with the College.
- 5.2. The main point of contact, authorised officer and information sharing approaches in relation to Prevent, is determined within the PSG.

6. Staff Training and Referral Procedure

- 6.1. Staff training is provided to all College staff. Key College staff and stakeholders who will benefit most directly from Prevent training, are prioritised. The training will enable attendees to:
 - 6.1.1. Identify the risks and signals of extremism and potential affiliation with terrorism.
 - 6.1.2. Understanding their duties and responsibilities in relation to Prevent.
 - 6.1.3. Understand the referral procedure and what actions to take with the information they have.
 - 6.1.4. Gain extensive training in relation to Prevent duty to reflect the nature of their work and function in respect of addressing Prevent issues.

6.2. Referral Procedure

- 6.2.1. If any staff or students are concerned about a staff member or student, they must contact the Quality Assurance Department at prevent@lcc.ac.uk or nominated other. The HoQA will liaise with relevant internal contacts and also liaise with appropriate external agencies. This might include: the local Prevent Co-ordinator and Metropolitan Police. Specific concerns about staff may be referred by the PSG to Human Resource Officer.
- 6.2.2. In cases of doubt or concern referrals should be made without delay and directly to the Chair or member of the PSG.

7. The Use of the Internet and other Electronic Communication Platforms

- 7.1. It is not permitted for any member staff, students or third party to use the College's Student Management System (SMS), IT and social media or other elements of the information management systems or processes for the instigation, promotion or planning or execution of violent or non-violent extremism, radicalisation or terrorism in the name of ideology or belief. The College's Information Security Policy clearly states expectation of use, transmission or receipt of obscene, unlawful or indecent images or material, and makes specific mention of the Prevent duty. The information Security Policy advises staff and students of consequences of accessing inappropriate material and the steps the College may take to monitor and/or intercept communications. This information is provided to students in the Student Handbook.
- 7.2. Staff or students who seek to research sensitive or extremism-related materials, must refer proposed activity to the PSG for advice.



- 7.3. The College reserves the right to ask students or members of staff to remove from the College's sites, all or any electronic or physical material encouraging engagement with violent or non-violent extremism, radicalisation or terrorism related activities.
- 7.4. The Student Code of Conduct and Disciplinary Procedure and the Staff Code of Conduct in the Staff Handbook advise on appropriate behaviours and expectations of behaviour from both students and staff.

8. Events

- 8.1. The College is committed to principles of free intellectual enquiry, free expression and freedom of speech within the law and seeks to ensure its principles and practices are safeguarded within the context of preventing people from being drawn into terrorism. External speakers and events, including academic guest lectures, Student body activity, commercial external visitors and/or religious events are subject to the External Speakers and Events Policy which clearly outlines the process for booking such events and speakers and also the procedures for referral / escalation.
- 8.2. Religious and community contacts can offer advice in relation to religious events, and work with students and staff to counter extremism and promote good relations between people of different faiths and beliefs.
- 8.3. Events held off-site which are College or Student body branded are subject to the same criteria outlined in the External Speakers and Events Policy.
- 8.4. The Student Code of Conduct and Disciplinary Policy describes the conduct expected and required by the College and use disciplinary processes as appropriate in event of actions of protest or systematic activity, which are aimed at preventing the freedom of speech. Additionally, the Freedom of Speech Policy describes the code of practice to be followed by students.
- 8.5. The College ensures that it upholds equality legislation considering that gender segregation, such as holding meetings which are open to both genders, or seating men and women separately at an event, is not permitted. These events include academic meetings, speaking events, lectures or meetings organised for and attended by students, members of the public or employees of the College, whether or not held on College premises.

9. Welfare and pastoral care/chaplaincy support

- 9.1. The College provides pastoral support and publishes the Management of Prayer and Faith Facilities Policy for use of the prayer rooms provided.
- 9.2. Further information on the Welfare available to students in relation to Prevent can be found in the College's Student Welfare Policy.

10. Confidentiality and Information Sharing and Record Keeping

- 10.1. The College provides a number of support services to staff and students which offer a secure environment for individuals to discuss sensitive issues in confidence. The College is committed to the Information Security Policy, which includes maintaining strict confidentiality when delivering these services.



- 10.2. This policy recognises that the nature of the work undertaken by some College support services, may result in the disclosure of specific information about an individual or a group of individuals engaged in lawful activity. In accordance with the law, such information can be disclosed to bodies within or outside the College, including the Prevent Co-ordinator, 'Channel', the police or social services.

11. Student Body and Societies

- 11.1. The College's Student body plays an active and positive role in ensuring and maintaining cohesion amongst the College site(s) and the College and its students. College students are expected to adhere to the Prevent Policy and other policies whether on or off-site. The Student Code of Conduct and Disciplinary Policy and Privacy Notice for Students clearly enunciate behaviour expectation and activities which are permitted on College sites.
- 11.2. The College provides Prevent awareness training for the Student Representatives and all Prevent-related policies and procedures are made available to all students through the VLE.

12. Terms and References

- 12.1. Terms can be checked at the site: <https://www.gov.uk/government/publications/prevent-duty-guidance>
- 12.2. Terrorism: Section 1 of the Terrorism Act (2000) defines terrorism as the use or threat of action where the action involves violence against a person, property, endangers a person's life, creates a serious risk to the health or safety of the public or aims to seriously interfere with or disrupt an electronic system. The use or threat must be designed to influence the government, intimidate the public and must be made for the purposes of advancing a political, religious, racial or ideological cause.
- 12.3. Extremism: the Prevent strategy (2011) defines extremism as 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. It also includes the call for the death of members of our armed forces, whether in this country or overseas.
- 12.4. Non-violent extremism is extremism, which is not accompanied by violence.
- 12.5. Radicalisation refers to the process by which a person comes to support terrorism and extremist ideologies associated with terrorist groups.
- 12.6. Prevention in the context of this document, means reducing or eliminating the risk of individuals becoming involved in terrorism. Prevent includes but is not confined to the identification and referral of those at risk of being drawn into terrorism into appropriate interventions. These interventions aim to divert vulnerable people from radicalisation.
- 12.7. Safeguarding is the process of protecting vulnerable groups, whether from crime or other forms of abuse from being drawn into terrorist-related activity.
- 12.8. Any queries raised in this Strategy should be presented to the PSG. Further references available from <http://www.universitiesuk.ac.uk/policy-and-analysis/Pages/universities-and-counter-terrorism.aspx>





Prevent

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 as to which you can follow:

