

Prevent Policy

Introduction

The School acknowledges its responsibilities under the [Counter-Terrorism and Security Act 2015 \(CTSA\)](#), which introduced a new statutory duty for higher education institutions to have “due regard to the need to prevent individuals from being drawn into terrorism” (the “Prevent duty”). Given this responsibility, this Policy and Procedure also covers concerns raised by staff or students relating to radicalisation. Concerns relating to radicalisation may pertain not only to children and vulnerable adults but to all School staff and students.

This Policy and Procedure therefore sets out this School’s responsibilities, policies and procedures in relation to the safeguarding of children and vulnerable adults; as well as the procedures for raising any concerns relating to radicalisation.

Definitions

Children are people under 18.

Vulnerable adults are adults as defined by section 59 of the [Safeguarding Vulnerable Groups Act 2006](#) as amended by the [Protection of Freedoms Act 2012](#) and/or those persons aged over 18 who by reason of mental or other disability, age or illness are (or may be) unable to take care of themselves or are (or may be) unable to protect themselves against significant harm or exploitation.

Safeguarding is protecting children and vulnerable adults from maltreatment and harm. Harm may be physical, sexual or psychological. This can include protection from involvement with crime and/or terrorism.

Prevent is the Government’s anti-radicalisation agenda, embedded in the [Counter-Terrorism and Security Act 2015](#).

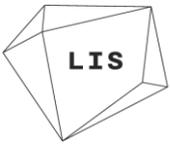
A *vulnerable individual* is an individual who is susceptible to being exploited by radical groups and subsequently drawn into terror-related activity.

Academic freedom is the expectation that staff and students shall have the freedom within the law to question and test received wisdom and to put forward new ideas and controversial or unpopular opinions, without placing themselves in jeopardy of losing their jobs or privileges.

Radicalisation is the process by which an individual comes to support terrorism and extremist ideologies associated with terrorist groups.

Extremism is defined by the government 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. Also included in this definition are calls for the death of members of the British armed forces, whether in the UK or overseas.

Terrorism is an action that endangers or causes serious violence to a person or people; causes serious damage to property; or seriously interferes with 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.

Scope

This Policy and Procedure applies to all staff and students.

Our Approach to the Prevent Duty

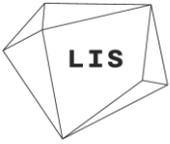
The [CTSA](#) states that in meeting the statutory duty, higher education institutions must have *particular regard* to ensure freedom of speech and the importance of academic freedom. The School, like the government, recognises that HEIs are special places where freedom of speech and academic freedom are vital; our commitment to these can be found in our [Academic Freedom Policy](#), and our [Code of Practice on Freedom of Speech](#).

Therefore, in carrying out its Prevent Duty under the [CTSA](#), the School is careful to ensure that the risks of individuals being drawn into terrorism are carefully weighed against the risks of curtailing academic freedom and freedom of speech. Our approach to the Prevent Duty is proportionate to our size and context; it is risk-based; and it is underpinned by the values of equality and diversity, which are at the heart of our inclusive approach to teaching and learning. Given the relatively small size and low complexity of the School, and our commitment to enabling an inclusive and open culture, this means that in practice many of the steps the School will take to meet this duty will be light-touch, sensitive, and informal. However, all staff members and students will be instructed on the warning signs of radicalisation; and where staff members or students have concerns that a student may be being radicalised, there is a clear procedure in place for them to raise these concerns to the School's Designated Safeguarding Officer, who will deal with these concerns under the provision of this Safeguarding Policy and Procedure.

The School has developed its approach to the Prevent Duty in line with HM Government's [Prevent Duty Guidance: For Higher Education Institutions in England and Wales](#) and in line with the [relevant guidelines](#) published by the [Office for Students](#) (OfS).

The Prevent Duty as it associates to higher education institutions is an area of strong debate, given the tension between an HEI's duty to prevent individuals being drawn into terrorism and its duty to uphold academic freedom and freedom of speech. That is why the Board of Directors will review the School's approach to its Prevent Duty, as set out in this Safeguarding Policy and Procedure, on an annual basis, to assess the extent to which it strikes an appropriate balance between these two competing duties. This Policy and Procedure will also be reviewed annually from a legal and operational perspective by the Designated Safeguarding Officer, in collaboration with the School's Equality, Diversity and Inclusion Committee (EDIC), which includes a student representative.

The School's primary approach to its Prevent Duty is to place inclusivity and the welcoming of diversity at the heart of its teaching and learning model. This will mitigate against factors that can contribute to making individuals vulnerable to radicalisation, such as isolation, lack of integration, inequality and discrimination. This inclusive, diverse approach will be coupled with a strong commitment to pastoral care, with one-to-one



personal tutors for all students, and a range of learning, welfare, wellbeing and mental health support services provided by the School's Student Support Department.

Prevent Duty: Related Policies and Procedures

Aside from this Policy and Procedure, there are a number of other policies in place that support the School's discharging of its Prevent Duty, such as:

- The [Code of Practice on Freedom of Speech](#) (which includes the Visiting Speaker Code of Conduct and Procedure), which set out the School's policy and procedure for assessing and mitigating risks around external speakers, whilst maintaining the School's existing duty to promote freedom of speech;
- The [Dignity at Work and Study Policy and Procedure](#), which requires all staff and students to challenge any prejudice, discrimination, or extremist views, including derogatory language, and which provides a procedure by which these kinds of unacceptable behaviours should be dealt with;
- The [Equality, Diversity and Inclusion Policy](#), which sets out the responsibilities of all School staff and students in relation to supporting an environment of equality, diversity and inclusion.

Roles and Responsibilities

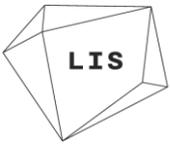
The **Prevent Lead is the Registrar**. This Officer is responsible for:

- Overseeing and managing the School's Prevent Policy and Procedure,
- Ensuring this Policy and Procedure is easily accessible to staff and students, and that appropriate School staff are provided with information, advice and training about Prevent;
- Ensuring that this Policy and Procedure and any Prevent training is implemented;
- Ensuring that this Policy and Procedure is monitored and reviewed in accordance with relevant changes in legislation and guidance on the protection of children, and on radicalisation;
- Establishing and maintaining contacts with appropriate external bodies, such as DfE Prevent coordinators, local authorities and the Police.

The **Designated Safeguarding Lead is the Head of Student Support**. This Officer is responsible for:

- Overseeing and managing the School's Safeguarding Policy and Procedure,
- Ensuring that this Policy and Procedure and any safeguarding training is implemented;

All staff and students are responsible for reporting any concerns about safeguarding individuals or radicalisation to the Prevent Lead or Designated Safeguarding Officer.



Radicalisation

Procedure for raising concerns

Staff and Students

Radicalisation can take place face-to-face or online. Whilst the risk of radicalisation is relatively low, a small number of students may be vulnerable to a range of radicalising causes, including religious radicalisation, far-right politics or animal rights extremism. Whilst children and vulnerable adults may be most at risk of radicalisation, students and staff who do not fall into these categories may also be at risk.

There is no set pattern to radicalisation, but there are some changes in behaviour that may prompt concerns that an individual is at risk of being radicalised, including:

- Noticeable changes in peer group or religious practices;
- Sudden or increased isolation from family/social group;
- Indication of the vulnerable person being insistently befriended by individuals or groups with radical views;
- Use of extremist or hate terms to exclude others or incite violence;
- Extremist political activism or the accessing, possession or distribution of materials advocating extremist views;
- An undertone of grievance or “us and them” language or behaviour;
- Increased emotional instability, and/or cultural or social anxiety;
- Possession of suspicious items (e.g., large amounts of money, multiple passports, unusually large amounts of everyday items that could be used to make incendiary devices).

There may be many reasons for such changes other than potential radicalisation, which is why a safeguarding approach should be adopted, as this enables the relevant services within and outside the School to identify the individual’s needs and vulnerabilities.

The procedure for School staff or students to report any concerns about radicalisation is the same as the procedure for reporting any safeguarding concerns relating to children or vulnerable adults (see Safeguarding Policy).

Where a staff member or student has concerns relating to the radicalisation of an individual, they should, where appropriate, first check their concerns, either with others who might have noticed something (such as colleagues or academic tutors), or speak to the person directly. Where concerns persist, the staff member or student should raise their concerns with the Prevent Lead or Designated Safeguarding Officer (DSO), using the Prevent Referral Form in Annex 2. Any staff or student suspecting an immediate threat to any individual or property should notify the Police and School Security, before raising their concerns with the DSO or Prevent Lead

The Prevent Lead will assess the concerns raised and determine whether to make an external referral to the School’s Prevent partners, local authorities or the police. All concerns raised will be treated securely, sensitively, and, so far as is possible, confidentially, in line with the Safeguarding Privacy Notice (Annex 3)

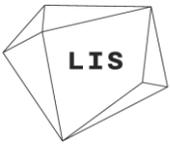
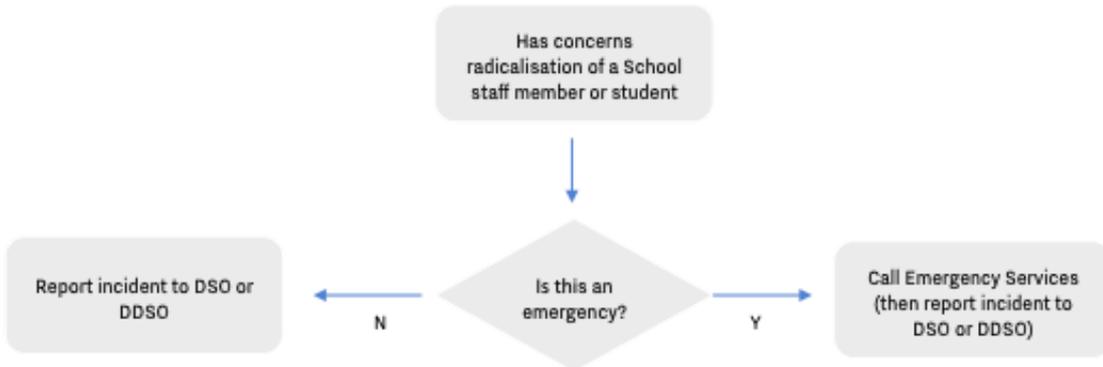


Exhibit 3: Procedure for LIS staff to report concerns about radicalisation

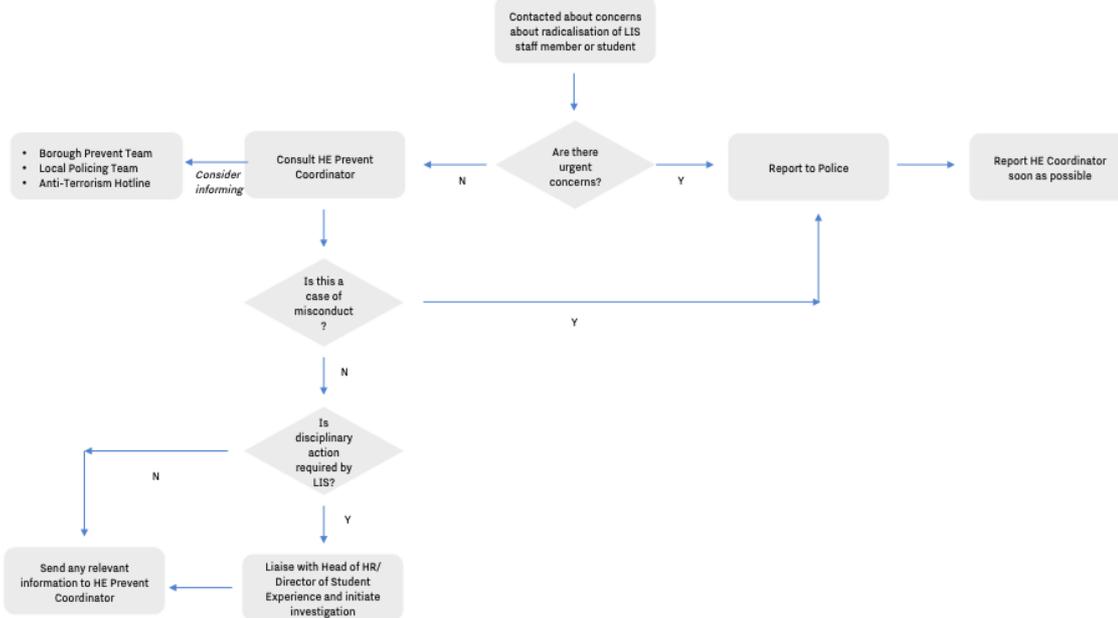


Prevent Lead or Designated Safeguarding Officer

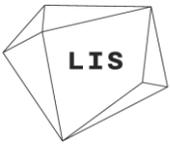
Where the School's Prevent Lead or Designated Safeguarding Officer receives a radicalisation concern, s/he will:

- (a) Address any serious and immediate risk.
- (b) Determine the appropriateness of a referral to the HE Prevent Coordinator, the Borough Prevent Team, the Anti-Terrorism Hotline, the Police or another appropriate agency, and provide sufficient information to the relevant external agency to enable and effective response.
- (c) Determine any further School procedures which should be invoked.
- (d) Identify any internal support required the individual concerned.

Exhibit 4: Reporting Procedure for Prevent



The DSO will record all information and actions taken in the Prevent Referral Form (Annex 2).



Allegations involving a member of School staff or student

Where concerns have been raised about the radicalisation of a School staff member or student, the Prevent Lead, in addition to following the procedure above, will liaise with the Head of Human Resources (where the individual is a staff member) or the Director of Student Support (where the individual is a student) to ensure that the individual concerned is receiving the support and guidance they require.

Where a concern of radicalisation is linked to act of alleged misconduct (e.g., a breach of the [Dignity at Work and Study Policy and Procedure](#)), the Designated Safeguarding Officer will initiate the relevant disciplinary proceedings as set out in the Staff Handbook or the [Student Code of Conduct and Disciplinary Procedure](#).

Prevent Training Programmes

All staff undergo Safeguarding and Prevent training as part of their full induction process. [Annex 2 sets out the School's Safeguarding and Prevent Training Programme](#).

The Prevent Lead (or trained external provider) leads refresher Prevent training for the full staff team on an annual basis. Staff will be apprised of any relevant changes in legislation and undergo scenario-based training.

The specialist Safeguarding team, comprising the Prevent Lead, Designated Safeguarding Officer and the Deputy Designated Safeguarding Officer, meet on an annual basis to review internal Safeguarding and Prevent policies and processes and to plan training needs which arise as a result.

On a rolling basis, and prior to any programme of student interactions (e.g. LIS Discovery Days), safeguarding procedures are reviewed at whole team meetings.

Reporting: Key Contacts

Prevent Lead: Dr. Michael England

Designated Safeguarding Officer (DSO): Alisha Kilich (Head of Student Support)

Local Authority Designated Officers (LADO): Verlyn Munro

Phone: 0207 364 0677

Emergency Duty Team

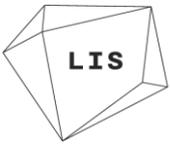
Phone: 020 7364 4079 (out of office hours)

Tower Hamlets Multi-Agency Safeguarding Hub (MASH)

020 7364 3009; Mash@towerhamlets.gov.uk

FE/HE Regional Prevent Coordinator for London: Jennie Fisher

Contact: 07795 454722; jennie.fisher@education.gov.uk



THE LONDON
INTERDISCIPLINARY
SCHOOL

Tower Hamlets Prevent Education Officer (Schools, Colleges and Training): Eleanor Knight
Contact: eleanor.knight@towerhamlets.gov.uk

Local Policing Team: phone 101

Anti-Terrorist Confidential Hotline: 0800 789 321

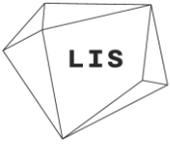
Home Office [online form](#) for reporting online terrorism.

Monitoring and Review

The Registrar will review this Policy and Procedure annually in collaboration with the Equality, Diversity and Inclusion Committee (EDIC). This review will take into consideration any relevant changes in legislation and guidance on safeguarding and radicalisation.

Any agreed changes must be submitted to the Board of Directors for authorisation. As part of its annual review of this Policy and Procedure, the Board of Directors will assess the extent to which it strikes the appropriate balance between the competing duties of preventing individuals being drawn into terrorism and upholding academic freedom and freedom of speech; and will authorise any further changes accordingly.

The Prevent Lead will submit an annual report to the Board on statistical information about the number of safeguarding concerns that have been raised, and how they were resolved.



Annex 1: Prevent Referral Form

Personal Details (about person deemed potentially at risk of radicalisation)

Name

Date of Birth

Contact details

Role/position (Staff/Student)

Person reporting incident

Name

Position

Contact details

Incident details

Date and Time

Location

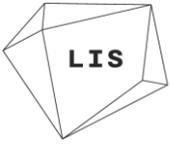
Nature of concern/allegation

Observations (Describe what you have seen/heard or what the person reporting the incident has seen or heard)

What was said (Record exactly what the individual at potential risk of radicalisation said and what you said).

Action taken

Initial action



Views of individual deemed at risk of
radicalisation

Other staff informed

Date and Time

Name(s)

Contact details

Details of discussion

External agencies informed

Date and Time

Name(s)

Contact details

Details of discussion

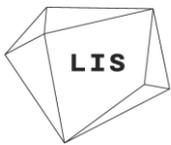
Form completed by

Name

Signed

Date

If the incident has been reported to one of the agencies above then a copy of this form must be sent within 24 hours of the telephone report



Version Control

Name of policy/procedure:	Safeguarding Policy and Procedure (including Prevent)
Document owner:	Registrar
Date Originally Created:	01/2019
Related documents: (eg associated forms, underpinning processes, related policies or overarching policies)	Equality, Diversity and Inclusion Policy Dignity at Work and Study Policy and Procedure Academic Freedom Policy Code of Practice on Freedom of Speech Staff Handbook Student Code of Conduct and Disciplinary Procedure Staff Training Programmes and Logs

Version Control			
Version	Author	Date	Brief summary of changes
1	Hannah Kohler (Director of Admissions and Student Support)	13/01/2019	Original draft
2	Dr. Michael Englard (Director of Widening Participation)	14/03/2019	Updated to reflect Designated Safeguarding Lead training, including references to statutory and non-statutory guidance including “Working Together to Safeguard Children (2018)”
3	Dr. Michael Englard (Director of Widening Participation)	25/06/2019	Added detail on Safeguarding and Prevent training. Included detail and schematics for Safeguarding referral. Included reference to Deputy Designated Safeguarding Officer. Included reporting contacts. Added Safeguarding referral form.
4	Hannah Kohler (Director of Admissions and Student Support)	26/06/2019	Combined Safeguarding and Prevent policies and procedures into a single document. Included detail and schematics for Prevent referral. Added Prevent referral form.
4	Hannah Kohler (Director of Admissions and Student Support)	26/06/2019	Improved detail on data section. Included Employment of Ex-Offenders Policy & DBS Procedures. Included section on Extenuating Circumstances
5	Hannah Kohler (Director of Admissions and Student Support)	27/06/2019	Included Safeguarding Privacy Notice.
6	Dr. Michael Englard (Director of Widening Participation)	27/06/2019	Minor wording changes
7	Hannah Kohler (Director of Admissions and Student Support)	01/08/2019	Added section on mental health welfare
8	Hannah Kohler (Director of Admissions and Student Support)	04/11/2019	Included internships into scope of Safeguarding policy. Minor wording changes; removal of training log.
9	Academic Council	18/12/2019	Approved
10	Michael Englard	07/05/21	Updated contact details and roles
11	Michael Englard (Registrar)	02/22	Updated roles