

www.lsme.ac.uk



2022-23 Academic Year

Prevent Duty Policy and Procedure

Introduction

LSME aims to provide an environment that respects and values the positive contribution of all its members so enabling them to achieve their full potential and to gain benefit and enjoyment from their involvement in the life of the College. These values are also enshrined in the College's Strategic Plan and the Equality and Diversity Policy.

To achieve this, the LSME acknowledges the following basic rights for all its members and prospective members:

- To be treated with dignity and respect
- To be treated fairly
- To receive encouragement to reach their full potential

These basic principles can only be achieved in a fair, conducive and safe environment that LSME strives to provide for all its students.

The Counter-Terrorism and Security Act 2015 / The Prevent Strategy

The government's Prevent Strategy is part of the overall strategy on counter-terrorism known as CONTEST¹ which aims to reduce the threat to the UK from terrorism by preventing people from becoming terrorists, or supporting terrorist activity as per the Counter-Terrorism and Security Act 2015 ("the Act"). The Act places a duty on specified authorities including HE providers to have "due regard to the need to prevent people from being drawn into terrorism."

Context

This policy is prepared to outline the Prevent Duty obligation of the LSME in accordance with the Counter-Terrorism and Security Act 2015. This obligation requires the institution to respond to the ideological challenge of terrorism and the threat we face from those who promote it; prevent people from being drawn into terrorism and ensure that they are given appropriate advice and support, and work with sectors and institutions where there are risks of radicalisation which we need to address. LSME is situated in Gants Hill and therefore serves the educational needs of the London Borough of Redbridge and surrounding areas, which is an ethnically diverse community. The good majority of our learners are mature students who have left mainstream education for years. This policy outlines LSME's approach to ensuring compliance with the requirements of the Act and the Prevent Duty and its approach to dealing with concerns raised within its community, and its contribution to any multi-agency response to concerns raised.

Scope

This Policy applies to all individuals who come into contact with LSME, including but not limited to students, staff, visiting speakers and directors, Employers, External Examiners and collaborating partners.

Leadership and Oversight

The Executive Director is the lead for Prevent in the College and chairs the Prevent Working Group which oversees the implementation of the Duty. The governing body (Board of Directors) is responsible for oversight of the extent to which the institution is compliant with the Prevent Duty obligation. The Prevent Working Group reports to the Board of Directors.

Policy Statement

Definitions

Radicalism: This refers to the process by which a person comes to support terrorism and forms of extremism. Protecting our students from the risk of radicalisation is part of the LSME's safeguarding duties as it is like protecting our students from a specific form of harm and abuse. During the process of radicalisation, it is possible to intervene to prevent vulnerable people from being radicalised.

Vulnerable Individuals: In the context of radicalisation, a vulnerable individual is a person who because of unique circumstances, state of mind and life experiences can be led into some form of terrorist ideology. Specific background factors may contribute to vulnerability and susceptibility to radicalization. These are often a combination of specific influences such as family, peer groups or online activities (social media). Other factors may include social exclusion, underachievement, recent religious conversion, rejection by peers, faith, social groups or family, victim or witness to race or religious hate crime, family conflict and identity confusion. Some of these factors may result in a recent change in appearance and or behaviour. Extremists or terrorists also may appear to provide an answer to the specific needs of vulnerable people.

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. The definition of extremism also includes calls for the death of members of our armed forces, whether in this country or overseas.

This Policy and Procedure of LSME makes it essential that staff can identify individuals who may be vulnerable to radicalisation, and know what to do when they are identified as part of the widening safeguarding duties, whether these come from within their family or are the product of outside influences. LSME staff are also required to build students resilience to radicalisation by promoting fundamental British values and enabling them to challenge extremist views.

It is important to stress that the Prevent duty is not intended to stop students from debating controversial issues. The College will always provide a safe space in which students and staff can understand the risks associated with terrorism and develop the knowledge and skills to be able to challenge extremist arguments.

All staff should attend relevant training on Prevent Duty to be in the position to make an effective judgment on the subject.

All staff and students are required to have an Enhanced DBS check. All staff must be able to demonstrate both a general understanding of the risks affecting students in the area and a specific understanding of how to identify individual students who may be at risk of radicalisation and what to do to support them.

As with managing other safeguarding risks, staff should be alert to changes in behaviour which could indicate that they may need help or protection. Staff should use their professional judgment in identifying students who might be at risk of radicalisation and act proportionately which may include discussing their concerns with the Prevent Duty lead or Safeguarding lead to making a referral to the Channel programme.

Approach

a) Risk Assessment

As part of its responsibilities the Prevent Duty, LSME will carry out a risk assessment that is proportionate to the size, complexity and cultural setting of the institution. The risk assessment will ensure that appropriate policies and procedures are in place to help identify and support individuals who may be vulnerable and also to provide clear management oversight of the requirements. The risk assessment will be regularly reviewed and, where necessary, updated annually.

b) Identification and Support

LSME will identify vulnerable individuals within its community as early as possible, whether they are members of staff or students, and ensure they are given appropriate support and welfare services. The College's responsibilities under the Act will be managed initially through existing safeguarding arrangements set out within this Policy, and also within the Safeguarding Policy.

c) Safeguarding Approach

The College's approach to implementing Prevent Duty is to integrate it as part of its safeguarding activities. We will continue to encourage a culture whereby all members of the college community feel involved and socially included in college life and support others to do the same. We consider this the most effective means of reducing the likelihood of individuals becoming isolated and vulnerable.

To ensure that vulnerable students are identified and supported, the College ensures that staff are equipped to deal with students in distress. This includes guidance on identifying and dealing with students who may be radicalised, underpinned by help and support for students through a Welfare Team and also a counselling service. Personal tutors are trained on the Student Welfare Policy. This is supplemented by tutorials on Fundamental British Values and Safeguarding for students and staff. In addition, the College has a robust Safeguarding Policy which provides support for students.

As part of Student Services, the College offers pastoral support to those of all students. The College also provides a Multi-Faith Room for use by staff and students of all faiths for contemplation and meditation. The use of this zone is monitored by the welfare team to ensure that they are being used appropriately, but also to ensure good relationships are developed with faith groups across the College.

d) Student Guidance

Students have been provided with enough information to understand the requirement of this legislation and what to expect from LSME. Have been made aware of the safeguarding policy and procedures and the need to report any concerns for further action. We have also communicated the Prevent Duty responsibilities including the British Values through the use of posters on the College premises

e) External Speakers

We are committed to maintaining an inclusive and supportive environment where all members of the college community are encouraged to engage in debate and to pursue both academic and non-academic interests. However, such debates must be within the law and to ensure that no one on campus or off campus is exposed to extremism, the College has a Code of Practice on Freedom of Speech and a policy to ensure appropriate due diligence and action around external speakers.

f) Referral Process

Internal Referral Process: Any member of staff or student may identify concerns about other members of staff or students who are vulnerable to the risk of being drawn into violent extremism, based on information they have received or behaviour they or other individuals may have observed recently. Most concerns about students may come from class tutors who are the first point of contact during tutorial sessions.

These concerns will be shared in a safe and supportive environment, where appropriate intervention can be offered if required and in a confidential manner.

It is suggested that, unless there is a direct threat (to life or of harm) concerns should, initially, be directed towards appropriate internal safeguarding and welfare provisions within the institution as shown on the flowchart below:

1. The tutor or appropriate member of staff will discuss the issue with the student and individual reporting the concern. These meetings will be recorded in the student meeting forms.
2. All internal processes for safeguarding will be applied and reviewed in subsequent meetings.
3. If the concerns no longer exist after regular follow-ups, there will be no further intervention.
4. If the concerns remain, the student will be referred to the Student Welfare and Pastoral Committee for further intervention.
5. If the concerns are resolved after regular follow-ups, there will be no further intervention from the Student Welfare and Pastoral Committee.
6. If the concerns remain, the Student Welfare and Pastoral Care Committee will refer the case to the Prevent Lead for further assessment. The Prevent lead will then work with the Prevent Working Group to assess the situation to decide whether it warrants a referral to the external Channel Panel or not.
7. Students who do not require a referral to the Channel Panel will continue to be monitored internally as per the internal support systems in place.

External Referral Process: Where existing safeguarding and welfare provisions have been offered, and the concern remains regarding an individual, or where the concern is so great as to warrant immediate external referral the following procedure will apply:

1. The concern should be raised initially with an appropriate member of staff within the College (eg Programme Leader) who should discuss the issue with the individual reporting the concern. The member of staff receiving the concern will, in turn, inform the Prevent Lead (prevent@lsme.ac.uk).
2. The Prevent Lead will discuss the concern with the reporting member of staff, and will then convene the Prevent Working Group to discuss the case. The Prevent Lead can also seek advice from our regional Prevent Coordinator before proceeding with a referral to the Channel Process. The Prevent Lead can also contact the local police force on 101 to discuss specific concerns as they can help gain access to further support and advice.
3. The Prevent Working Group and the Prevent Lead will consider all available options and will decide as to whether the individual is referred to the Channel Process facilitated by the Local Authority or is referred for further institutional safeguarding/welfare support (studentsupport@lsme.ac.uk).
4. The Prevent Lead will make the referral to the Channel process and will represent the College at multi-agency meetings / Channel Panel meetings in relation to the referral. Channel is a programme that focuses on the use of a multistage approach to providing support at an early stage to people who are identified as being vulnerable to being drawn into terrorism. The different stages within the Channel Process delivered via the local authority include:
 - identifying individuals at risk;
 - assessing the nature and extent of that risk

- developing the most appropriate support plan for the individuals concerned.

An individual's engagement with the programme is entirely voluntary throughout.

Out of Hours Referral: A concern that needs to be raised out of normal office hours should be raised in the first instance with the Prevent Lead. If there is an immediate concern of danger to life or harm the correct referral process is to call 999 and then inform the Prevent Lead at the earliest opportunity.

g) Information Sharing

As per the referral procedures, there may be instances where LSME is concerned for a person's welfare to share these concerns with external agencies such as the Channel process, Regional Prevent Coordinator and/or referral the Police under the terms of its Information Sharing Agreement. In sharing information with third parties the College will adhere to its Data Protection Policy, the requirements of the UK General Data Protection Regulations (GDPR), the Data Protection Act 2018, and the principles contained therein. Confidential records of the information shared will be kept by the LSME Prevent Lead in accordance with the requirements of the Data Protection Act 2018.

The Prevent Lead will handle requests from the Police/security services regarding individuals at LSME in accordance with current legislative requirements and the policies of the College. In all cases necessity, proportionality, risk and wherever possible the consent of the individual will be key to determining whether the information will be shared.

h) Training

LSME will ensure that appropriate training and awareness is offered to staff at all levels of the College, and in particular, it is suggested that members of staff within the following services will require Prevent duty and safeguarding awareness training:

- All-Academic Staff (Lecturers/Tutors and Support Tutors)
- Administration and Data Management Team
- Student Welfare Officer
- Access and Progression Officer
- Chief Research and Innovations Officer
- Senior Manager
- Class representatives

All other members of staff are encouraged to attend training, and line managers are responsible for making sure all their staff are aware of the Prevent Duty and the referral mechanism for raising concerns. Training will cover the Workshop to Raise Awareness of Prevent (WRAP) organized by the Home Office and in-house training on Prevent Policy and Safeguarding of students. The entire student body is invited to attend these awareness trainings.

i) Links with other Policies and Procedures

This policy is closely linked to other Policies and Procedures. In particular:

- The Code of Practice on the Conduct of Events and Freedom of Expression Policy include the process for approving external speakers. The Senior Management Team will manage the requirements of the Code of Practice and will also oversee the management of the College's Prayer rooms.
- The ICT Acceptable Use Policy includes the reference to the requirements of the Counter-Terrorism and Security Act 2015.

- The Safeguarding Policy outlines the College's procedures when dealing with safeguarding issues.
- Student Welfare and Pastoral Care Policy
- Fair use of Faith Rooms Policy

j) Working in Partnership

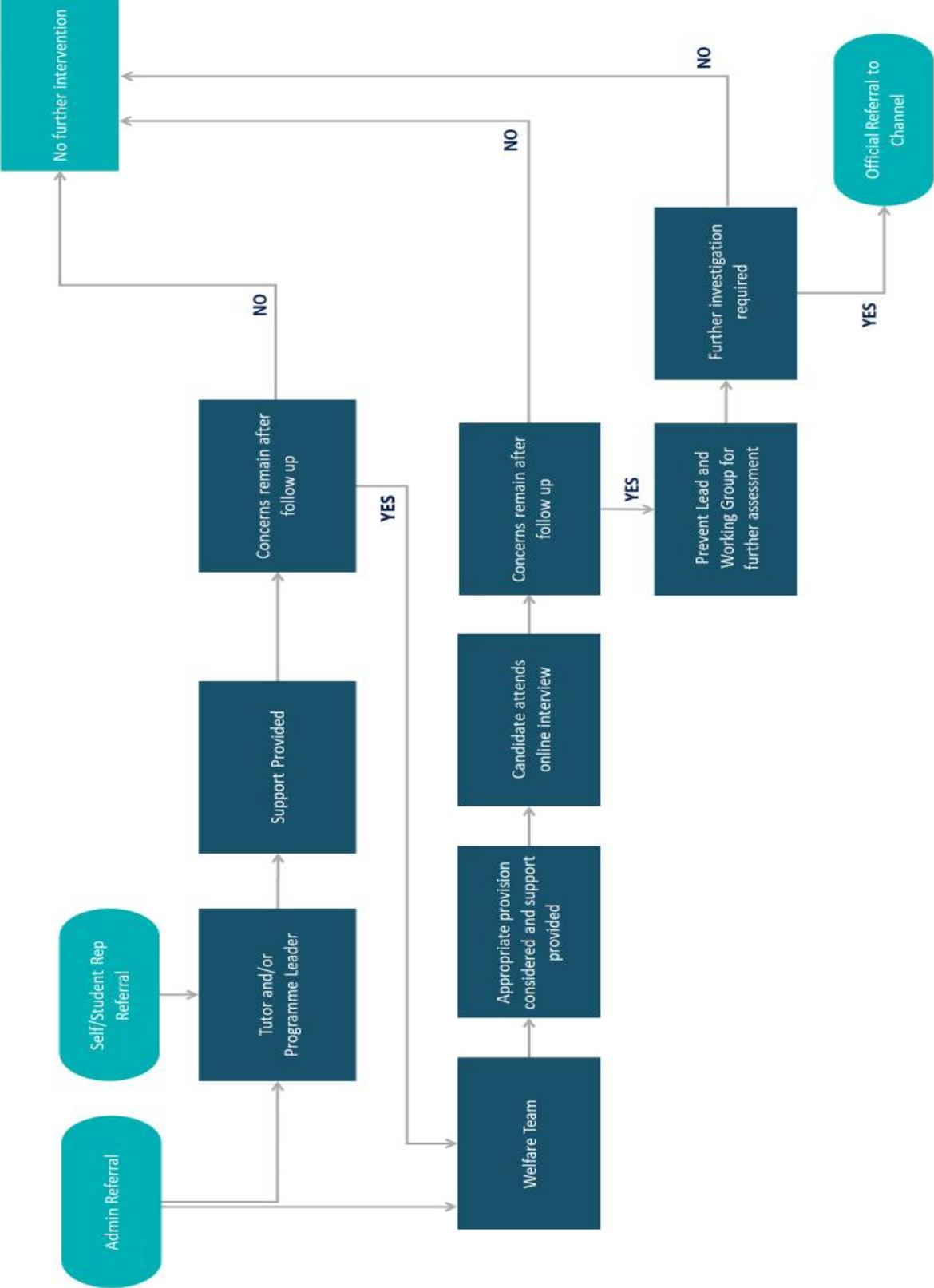
The College also works closely with the local authority and DfE partners to ensure that it has an up-to-date understanding of the current threat. The College has a wealth of support services available for staff and students, whether they are anxious about the impact of the Duty on themselves or if they have welfare concerns about others within the college.

f) Complaints

The Prevent Lead will also have the responsibility to coordinate any complaints received in respect of this policy and how the college handles its prevent responsibilities.

- The complaint should be addressed to the Administration Department (admin@lsme.ac.uk) in the first instance. The complaint will be acknowledged immediately and every effort will be made to offer a more comprehensive reply within two weeks.
- In case the Complainant is not satisfied with the reply then they should inform the Prevent Lead within 21 days. The College's Student Complaints Procedure will apply as appropriate.

For Prevent compliance-related complaints only, if applicants are dissatisfied with the outcome of the Complaints Procedure they may contact the OfS who have been delegated responsibility to monitor compliance of the Prevent Duty for relevant higher education providers. Concerns can also be raised by email to counter.extremism@education.gsi.gov.uk.



Appendix 1: Information Sharing / Referral Process for Vulnerable Individuals

Appendix - 2

Prevent Duty Working Group

- **Core Membership**

Prevent Lead (Chair)

Programme Leaders

Student Welfare Officer

Also, one or more of the following should be invited

- **Student Referral**

Lead Student Representative

Programme Leader

- **Staff Referral**

Administrator

Programme Leader

Terms of Reference

- a. The Prevent Duty Working Group will be convened by the Prevent Lead in response to a concern raised in relation to an individual who may be at risk of being drawn into violent extremism.
- b. The Panel will consist of the individuals mentioned above (as appropriate), but the Chair may request other relevant members of staff attend the meeting, as appropriate, to offer further information and/or advice.
- c. Anonymised reports of the Panel's meetings will be provided for monitoring purposes, at its next meeting.
- d. The Working Group will also review documents and Risk assessments annually to ensure they are fit for purpose.



London School of Management Education

Cambrian House
509-511 Cranbrook Road
Gants Hill
Essex IG2 6EY (UK)

Tel : +44(0)208 594 8462
Fax : +44(0)208 594 6138

Email : info@lsme.ac.uk
Website : www.lsme.ac.uk