

London College of Contemporary Arts

Prevent Duty Policy and Procedures

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Approved by:	Academic Board
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Amendment History

1. An amended and updated document that takes into account changes in the upper management structure at LCCA and formatted to the new policy document template being introduced for July 2019.

Introduction

The London College of Contemporary Arts (the College) is committed to protecting both the freedom of speech and academic freedom, but also to preventing people from being drawn into terrorism. Prevent is one part of the Government's strategies to target the threat of terrorism and extremism.

This policy outlines the College's commitment to preventing people from being drawn into terrorism in doing so recognises that terrorism can be associated with a range of ideologies. A definition of terrorism is provided below.

This policy is written with reference to the Counter-Terrorism and Security Act 2015, the Equality Act 2010, the Human Rights Act 1998, the Data Protection Act 2018, and the Freedom of Information Act 2000. The Counter-Terrorism and Security Act 2015 places a duty on Higher education providers to have 'due regard to the need to prevent people from being drawn into terrorism.' The Act also notes that institutions must seek to balance this duty with their commitment to freedom of speech and the importance of academic freedom.

The College takes a risk-based approach in discharging its duties under the Counter-Terrorism and Security Act 2015.

This policy should be read together with the College's *Safeguarding Policy and Procedures*.

Definitions

For the purposes of this policy;

- A student is defined as anyone who has accepted a place at the College, is currently studying at the College or who has completed their period of study but has outstanding assessments.
- A member of staff is defined as anyone who has accepted an offer of employment, or who is currently employed on a permanent contract.
- A visitor is defined as a temporary member of staff, contractor and/or individual working in a voluntary capacity with staff or students. Visitors also include anyone involved in an activity taking place on the College premises in their own right or on behalf of an organisation that has been given permission to use the College's premises. The College has a gallery on the 5th Floor at 9 Holborn that is used for a number of events throughout the year that invite visitors to the College's premises.

Terrorism is defined as the use or threatened use of violence for the purpose of advancing a political, religious, racial or ideological cause.

Responsibility for this Policy

Ultimate responsibility for the development and overseeing the application of clear and effective processes associated with the maintenance of standards and the quality assurance of academic provision at the College lies with the College's Academic Board.

Principles

The College is committed to fostering an inclusive environment in which the principles of academic freedom and freedom of speech underpin the educational institution whilst, at the same time, ensuring that individuals are safeguarded from being drawn into terrorism. The College will seek to identify, protect and support individuals who it believes may be at risk of being drawn into terrorism. It discharges this responsibility in partnership with other agencies, including the police, Local authorities and the network of regional Prevent coordinators.

Institutional Duties

The College operates a risk-based approach and, on the basis of its risk assessment, identifies any actions which need to be taken to mitigate these risks and develops an appropriate action plan.

The College ensures that relevant staff members are provided with appropriate training as outlined in the Prevent Duty Guidance and makes staff, students and visitors aware of the importance of referring concerns under the referral process contained in Appendix A.

The College's Prevent Lead is ordinarily a member of the College's Senior Management Team (SMT) whose responsibilities include:

- Attending external meetings to update on the Prevent agenda,
- Ensuring relevant updates on the Prevent agenda and on threat levels are communicated to the appropriate College staff,
- Ensuring relevant staff are provided with appropriate training,
- Ensuring the College SMT, including the College's Designated Safeguarding Lead, are fully updated regarding the most current Prevent developments,

The College's Curriculum Standards Manager (CSM) is responsible for ensuring that relevant policies are compliant with the Prevent Duty Guidance and that any amendments to policy are put forward for consideration following a period of consultation within the College. The CSM works closely with the College's Student Council to ensure that the policies the College develops in this area are supported, where appropriate, by the student body.

The College provides prayer/quiet reflection space for students through Global University Systems (GUS) as a shared service at 30 Holborn, London. This facility is advertised to students at 9 Holborn.

Information Sharing

In reaching a decision to share any information with third parties in implementing this policy, the College will adhere to its Privacy Policy and the Data Protection principles contained therein.

In the referral process, outlined in Appendix A, there may be instances where the College is sufficiently concerned by a person's behaviour and the risk they potentially pose that it will need to share these concerns with external agencies. In such circumstances the College will share only sufficient and relevant information in order to allow the concern to be appropriately addressed.

The College will keep confidential records of the information shared. These will be kept in accordance with the Data Retention Policy.

Responsibility for the Provision

Responsibility for the review and oversight of this policy and associated protocols, and for the evaluation of their effectiveness, lies with the Prevent Lead.

Formal responsibility for monitoring and evaluation of this provision lies with the LCCA Board.

Appendix A

Referral Process

Any person may identify concerns about an individual potentially being drawn into violent extremism based on information received or behaviour observed. It is important that such concerns can be shared in a safe and supportive fashion to enable them to be investigated and appropriate intervention to be developed, if required.

It is equally important that assumptions are not made on the basis of information received and that referrals are investigated thoroughly and fairly. The College will seek to approach such concerns from the perspective of safeguarding the individual who is the subject of the concerns expressed.

Only where there is clear and compelling evidence of a requirement to do so will information be shared with other agencies.

Stage 1 – Investigation and Consideration by the SMT

Where a person has concerns that an individual is expressing violent extremist views or is at risk of being drawn into violent extremism, these concerns should be passed to the College's Designated Safeguarding Lead or Deputy Safeguarding Lead.

The Designated Safeguarding Lead or Deputy Safeguarding Lead will inform the Prevent Lead and, if the concerns relate to a member of staff, the College's HR Business Partner. The Prevent Lead will investigate the referral, with the assistance of the HR Business Partner where relevant, and present a report to the SMT which will include a recommendation to either escalate the matter, or not.

SMT will consider the report and, if they agree that the matter is concerning enough to warrant escalation, they will convene the College Prevent Panel (see Stage 2). If the SMT agree with a recommendation that the matter does not require escalation, no further action will be required.

A record of the SMT's decision will be kept by the College Prevent Lead.

Stage 2 – The Prevent Panel

The College Prevent Panel which will consist of the following members;

- Designated Safeguarding Lead or Prevent Lead (Chair)
- The Group Legal Counsel
- The relevant Head of School

The College Prevent Panel will make a decision as to the seriousness of the case. Three potential outcomes are likely at this stage:

- No further action under the protocol is required.
- There is substance to the case but, at this stage, the concerns are not deemed to be serious and internal action only is required.

- The panel considers that the concerns are serious and referral to an external agency is appropriate.

A record of the panel's decision will be kept by the College Prevent Lead.

Stage 3 – Referral or Internal Action

- Where a decision has been taken to refer.

The matter will be referred to the Prevent contact for the relevant local authority.

Where the College Prevent Panel consider that there is evidence to suggest that there might be an immediate threat of criminal activity, or to the safety of the individual or others, the matter will be referred to the Police.

The Principal of the College and the Data Protection Officer will be notified of the Panel's decision immediately.

The College Prevent Panel will also consider whether the case should be considered under any other College Policy, irrespective of the above decision. Proceedings under other College Policies may be stayed pending the outcome of the above referral.

- Where a decision is taken that there is substance to the case but, at this stage, the concerns are not deemed to be serious and internal action only is required.

The exact nature of the intervention required would be determined by discussion between relevant staff members. Actions and a review date will be agreed. At the review, the College Prevent Panel would again consider the case. At this time the options open to the case review would be to refer the case to an external agency, to continue with internal action, or that the case no longer requires any further action.

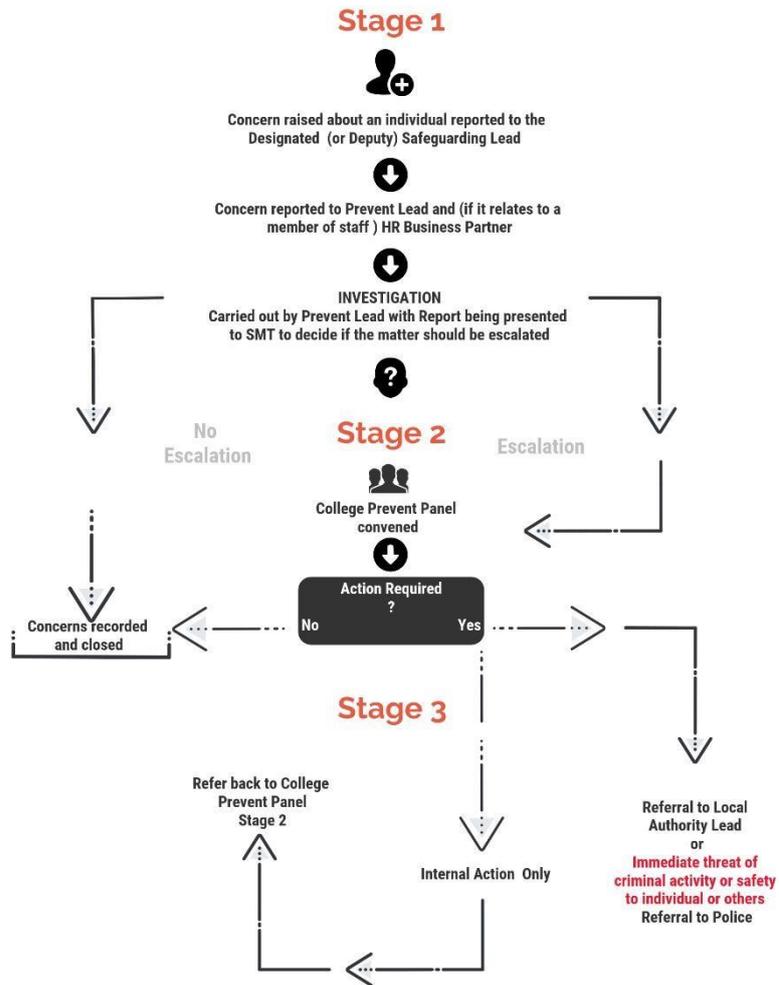
A record of the panel's decision will be kept by the College Prevent Lead.

A flowchart for the process of reporting concerns is included in Appendix B and a referral form is included in Appendix C.

Appendix B

PREVENT
PROCESS

The key stages in the Prevent referral process.



Students.
For more information about this process, or any other questions about Higher Education study, please speak with a member of LCCA staff or go to: <https://www.lcca.org.uk/about-us/policy-portal/>
If you have questions or are unsatisfied about the College Prevent policy, please contact the Student Council President.

Appendix C

Prevent Policy Referral Form

Subject of Referral	
Date of Referral	
Name	
Student ID (if applicable)	
Gender	
Is the subject of referral under 18?	Yes/No
Person Referring	
Name	
Contact Details	Email
	Phone number
	Address
Role	

Vulnerability Factors		
Factor	Notes	Y/N
Faith/Ideology	e.g. Concerning comments relating to faith or ideology, or association with extremists	
Social Mobility	e.g. poverty, lack of education or employment, immigration issues	
Physical or Mental Health	e.g. Disability, learning difficulties, mental health concerns	
Risk or harm factor	e.g. threat posed by family member, victim of hate crime or personal attack	
Criminal activity or assoc.	e.g. involved in criminal activity or associating with known criminals	
Isolation or exclusion	e.g. lack of social activity, isolation, absent peer groups	
Other factor	Any other factors Please specify:	
Is the individual aware of the referral?		Yes/No

Explanation of Referral	Date last updated
<i>Brief explanation of reason for referral, incident details and offences, if applicable.</i>	

Actions taken to date	Date last updated	