



LONDON GRADUATE SCHOOL

PREVENT POLICY

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Introduction

1. London Graduate School is committed both to protecting freedom of speech and academic freedom and to protecting and safeguarding its students & staff from the risk of being drawn into terrorism. This policy outlines our commitment to preventing students from being drawn into terrorism.

Policy Statement

2. This Policy is to comply with the Counter Terrorism Act (CTA2015). LGS will ensure that it has in place appropriate arrangements to discharge the specific statutory duty set out in Section 26 (1) CTA 2015: "To have due regard to the need to prevent people from being drawn into terrorism." The College have particular regard to other statutory duties to (a) ensure freedom of speech (The Education (No.2) Act 1986); and (b) have particular regard to the importance to academic freedom (Education Reform Act 1988).

Scope

3. This Policy applies to all individuals who come into contact with LGS, including but not limited to students, staff, visiting speakers, advisors and directors, as well as all course representatives and volunteers.

Principles

4. The College is committed to fostering an inclusive environment in which the principles of academic freedom and of freedom of speech underpin our mission.
5. LGS is committed to ensuring vulnerable individuals are safeguarded from being drawn into terrorism.
6. LGS will seek to identify, protect and support individuals who it believes may be at risk of being drawn into terrorism.
7. LGS discharges this responsibility in partnership with other agencies, including the Police, Local Authorities and the network of regional Prevent Co-ordinators.

School Duties

8. The College, at a senior management level, will actively engage with other partners including police and BIS Regional Higher and Further Education PREVENT Coordinators.
9. The College will make use of internal mechanisms to share information about PREVENT.
10. The College will ensure that Staff are provided with appropriate training, specific to their needs in accordance with statutory requirements.
11. The College will carry out a risk assessment. This will include satisfying itself and the Government that appropriate policies and procedures are in place to help identify and support any individual who may be vulnerable and providing clear management oversight of risks.
12. On the basis of the risk assessment, the College will develop an action plan to address actions which need to be taken to mitigate potential risks.
13. The College will ensure that its IT Acceptable Use Policy has due regard to the duties specified in the CTA Statutory Guidance.
14. The College will ensure that it has an appropriate Code of Practice for External Speakers which is regularly reviewed.
15. The College will ensure that any event that hosts a speaker or event where there is potential for extremist views that risk drawing vulnerable people into terrorism, or views

shared by terrorist groups, will be balanced by also hosting speakers of opposing opinions at the same event.

Processes to Ensure Implementation, Application and Compliance

16. The Head of Operations and Academic Standards has direct overall responsibility as PREVENT Lead. The post-holders deal with immediate risk assessments in conjunction with advice from security services and routine updates.
17. The Senior Management Team (SMT) meet regularly to review and provide updates to the Prevent Risk Assessment and Action Plan, receive updates and direct the implementation of prevent compliance across the College.

Referral of Concerns Regarding Radicalisation

18. Any member of the College (student or staff) may identify concerns about an individual potentially being drawn into violent extremism based on information received or behaviour observed.
19. It is important that such concerns can be shared in a safe and supportive fashion to enable concerns to be investigated and an appropriate intervention to be developed, if required.
20. 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 about whom concerns have been expressed.
21. Only where there is compelling evidence of a requirement to do so will information be shared with other agencies.

6. The Concern Reporting Process

22. Where a student or staff member has concerns that an individual is expressing extremist views or is potentially vulnerable to being radicalised into violent extremism, these concerns should be passed on to the Prevent Lead.
23. The Prevent Lead will investigate the matter, seeking to collate substantive information and evidence which will allow full consideration of the concerns.
24. The Prevent Lead will consider the substantive evidence in discussion with other members of the College SMT.

A decision will be made as to the seriousness of the case. Three potential outcomes are likely at this stage:

- a. **No further action is required.** In this case, a confidential record of the case will be kept by the Head of Operations and Academic Standards, and the Programme Manager (Registrar) would be notified that a case had been investigated but no further action is required.
- b. **There is substance to the case but at this stage only internal action 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 case would be assessed again and the appropriate actions taken. It is anticipated that in the majority of cases the intervention would be supportive and safeguarding in nature and fall under the remit of the Programme Manager (Registrar).
- c. **A referral to the police is required because there are serious and immediate issues of safety to the student or others, and / or there is evidence to suggest a criminal act may be committed or has been committed.** This decision would be taken only in the most serious of circumstances and only by

the Programme Manager (Registrar) or by delegated authority in his/her absence.

- 25 SMT meeting will be called in response to a concern raised in relation to an individual who may be at risk of being drawn into violent extremism.
- 26 The SMT will consist of the CEO, Prevent Lead, Programme Manager (Registrar), QA Manager. The Chair may request other relevant members of staff attend the meeting, as appropriate, to offer further information and / or advice.
- 27 The SMT will make a decision as to whether an individual case is referred to an external agency for further support, to the Channel Panel process, or is referred back to existing welfare and safeguarding provisions within the College.
- 28 In case of external referral the Prevent Lead will communicate with relevant external agency.
- 29 In reaching a decision to share information with third parties the College will adhere to its Data Protection Policy.