

Prevent Policy

Index

<u>1.</u>	<u>Introduction</u>	<u>4</u>
<u>2.</u>	<u>Definitions</u>	<u>4</u>
<u>3.</u>	<u>Scope</u>	<u>4</u>
<u>4.</u>	<u>Our approach</u>	<u>4</u>
<u>5.</u>	<u>Leadership</u>	<u>5</u>
<u>6.</u>	<u>Risk assessment</u>	<u>5</u>
<u>7.</u>	<u>Responsibilities</u>	<u>6</u>
<u>8.</u>	<u>Training</u>	<u>6</u>
<u>9.</u>	<u>Causes for concern</u>	<u>6</u>
<u>10.</u>	<u>Referral of concerns regarding radicalisation</u>	<u>7</u>
<u>11.</u>	<u>Partnerships</u>	<u>8</u>
<u>12.</u>	<u>Channel</u>	<u>8</u>
<u>13.</u>	<u>Ways of mitigating risks</u>	<u>8</u>
	13.1 Management of external speakers and events	8
	13.2 IT policies	9
	13.3 Social media	9
	13.4 Branding	9
<u>14.</u>	<u>Ethics Committee</u>	<u>10</u>
<u>15.</u>	<u>Gender segregation</u>	<u>10</u>
<u>16.</u>	<u>Potential terrorist incidents</u>	<u>10</u>
<u>17.</u>	<u>Review of the Prevent Policy</u>	<u>10</u>
<u>18.</u>	<u>Related regulations, policies and procedures</u>	<u>10</u>
	<u>Appendix A: The Legislative Framework for our Prevent Policy</u>	<u>12</u>
	<u>Appendix B: Safeguarding Referral Form</u>	<u>13</u>

Document Version Control

Document Version	Committee	Committee Action	Date
V 7.0	SMLT	Approved	2 March 2022
V 8.0	SMT	Approved	1 March 2023
		Date in force	1 March 2023

The Prevent Policy will be reviewed annually by our Senior Management Team (SMT). Any amendments require the approval of our Senior Management Team.

1. Introduction

Under the Counter-Terrorism and Security Act 2015, we are required to 'have due regard to the need to prevent people from being drawn into terrorism'. The way in which we need to comply with the Counter-Terrorism and Security Act 2015 is set out in the *Prevent duty guidance for higher education institutions in England and Wales* which came into effect on 18 September 2015 and was last revised in April 2021. Information on how our implementation of the Prevent duty is to be monitored by the Office for Students is set out in *Additional guidance on Prevent duty: Framework for monitoring in higher education in England 2018-19 onwards* (September 2018).

Prevent works within a non-criminal space, using early engagement to encourage individuals and communities to challenge violent extremist ideologies and behaviours. We therefore view and would encourage our students and staff to view Prevent as a safeguarding exercise aimed at preserving the wellbeing of our academic community.

Prevent is part of a broader counter-extremism strategy known as Contest. Contest has the following four strands:

- **Pursue:** to stop terrorist attacks;
- **Prevent:** to stop people becoming terrorists or supporting terrorism;
- **Protect:** to strengthen our protection against a terrorist attack;
- **Prepare:** to mitigate the impact of a terrorist attack.

Our Prevent duties are currently shared in part with our academic partner institutions and Birkbeck College (our supplier of classroom, social space, and library facilities).

2. Definitions

The following definitions come from HM Government Prevent Strategy 2011.

Radicalisation is defined as the process by which people come to support terrorism and extremism and, in some cases, to then participate in terrorist activity.

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.

Terrorism is an act that endangers or causes serious violence to a person/people, causes serious damage to property, or seriously interferes 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. Terrorism is not confined simply to acts of violence, it extends also to non-violent acts. Non-violent terrorism takes the form of popularising views which terrorists exploit. Obvious terrorist groups include Islamist extremists and white supremacists.

3. Scope

Our Prevent Policy applies to all staff at Bloomsbury Institute (including external consultants) and relevant sections apply to all students.

4. Our approach

We believe that our obligations under the Prevent duty offer an opportunity to consolidate the duty of care we have already set out in our existing [Safeguarding Policy](#)¹ and general welfare procedures. Our approach is very much determined by the focus we place on the safety and wellbeing of individuals.

¹ www.bil.ac.uk/qem/policies/

Safeguarding our students and staff from radicalisation or terrorism is no different from protecting them from any other forms of harm.

Guided by our [Equality, Diversity and Inclusion Policy](#)² which explicitly recognises the importance of inclusion in order to mitigate the risk of radicalisation, we feel that we have created the community cohesion that lies at the heart of Prevent. Indeed, our Equality, Diversity and Inclusion Committee (EDIC) plays a very active part in promoting and celebrating as many multicultural events as possible in order to foster a real sense of community.

We believe that the more open and equal a society or environment we create, the less likely it is for students or staff to go down the radical path. We recognise that failure to include students and staff can marginalise them and lead to radicalisation. We also believe that we can develop resilience to extremism through education and debate. In the case of our students, by helping them to develop critical thinking skills, we are able to provide them with an important tool against the risk of radicalisation and possible terrorism. In this way, we are equipping our students with skills to be applied outside the confines of Bloomsbury Institute.

In view of the above, we welcome the recognition given in the Prevent duty guidance to the importance of individual institutions taking a proportionate and risk-based approach to meeting their Prevent obligations.

5. Leadership

Our Chief Operating Officer and Chief Financial Officer, and our Head of Governance and Company Secretary (who acts as our Prevent Lead³) have ultimate responsibility for compliance with the duty to prevent people from being drawn into terrorism. They are supported, however, by our Senior Management Team (SMT) who provide oversight of Prevent duties in terms of approving and amending Prevent policy and procedural documents, receiving monthly Prevent update reports from the Head of Governance and Company Secretary and receiving risk assessments for recommended approval on a quarterly basis. See **Section 6**.

Our Board of Directors has ultimate responsibility for ensuring compliance with the Prevent duty through the receipt of Prevent update reports from the Head of Governance and Company Secretary and a quarterly Prevent Risk Assessment for approval. In addition, the Board is responsible for approving the Prevent Annual Report, acting upon the recommendation of the SMT. It is on the basis of these reporting mechanisms that the Board of Directors is able to submit to the Office for Students an annual declaration of compliance and Accountability Data Return.

The Board of Directors' responsibilities in relation to Prevent are set out in our [Corporate and Academic Governance Framework](#)⁴ (CAGF) which is reviewed on an annual basis, and included also in our Directors' Induction, Training and Development Programme.

6. Risk assessment

Our Head of Governance and Company Secretary is responsible for reviewing our Prevent Risk Assessment on a quarterly basis (March, June, September and December) for recommended approval by the SMT to the Board of Directors. However, ad hoc reviews can be conducted by the SMT at any time in the event of organisational change or a likely or specific threat occurring.⁵

² www.bil.ac.uk/qem/policies/

³ maria.jackson@bil.ac.uk

⁴ <https://www.bil.ac.uk/qem/section-1/>

⁵ The Senior Management Team meets on a monthly basis (with the exception of August), but extraordinary meetings can be called at any time.

7. Responsibilities

Primary responsibility for student welfare or pastoral support lies with our Centre for Student Engagement, Wellbeing and Success (SEWS) in the form of our Success Champions and our Disability and Wellbeing team. Given that we firmly believe that Prevent is an extension of our Safeguarding Policy and procedures, our Centre for Student Engagement and Wellbeing (SEWS) assumes front-line ownership of our Prevent obligations, and our Director of SEWS is the point of contact for any safeguarding referrals raised by her SEWS team or other third parties. Upon investigation, if the Director of SEWS decides that the concern is Prevent-related, she will refer the matter to the Head of Governance and Company Secretary. The Head of Governance and Company Secretary will investigate further (if need be) and make a decision regarding appropriate actions. In the absence of the Director of SEWS and/or the Head of Governance and Company Secretary, their respective roles would be undertaken by the Deputy Principal and the Chief Operating Officer and Chief Financial Officer. See **Appendix C** for details of our referral reporting process.

8. Training

Compulsory Prevent awareness training covering the following areas is incorporated within our Continuing Professional Development Programme for all staff:

- What is radicalisation and the radicalisation process.
- The Prevent Duty and what it means in practice.
- Implementing Prevent sensitively to protect both people and their freedoms.
- Promoting tolerance.
- Recognising vulnerability to radicalisation.
- Responding to concerns in terms of knowing where to get advice and support.
- Understanding next steps and how Channel can help and support vulnerable individuals.

The training takes the form of an overview session from the Prevent Lead for all new staff in week 2 of them joining Bloomsbury Institute, and completion of an online training course within the first month of joining. Completion of the compulsory Prevent training is monitored by our People, Talent and Culture team and is reported upon within our Annual Staff Appraisal and Development Scheme.

Coverage of our institutional Prevent obligations and links to all relevant policies are also included in our Staff Handbook which is one of the key company documents all staff are required to read. In addition, this policy document and all related policies are available from [Part 3 of our online Quality and Enhancement Manual](#)⁶.

Prevent is also covered within our Board of Directors' Induction, Learning and Development Programme and focuses on the Board's legal duties, and the directors' key responsibilities.

9. Causes for concern

We have a duty of care to identify, protect and support a student or staff member who may be at risk of radicalisation or who may have already been radicalised. This duty of care extends both to the individual concerned and to the wider community. It is crucial therefore that when addressing any concerns that you or a third party might have, you bear in mind the need for factual evidence: either your own observations of what an individual might have said or how an individual might be behaving, or

⁶ <https://www.bil.ac.uk/qem/policies/>

information disclosed to you by a third party e.g. an individual's friends, peers or tutors. Assumptions should not be made.

There is no definitive checklist of signs of radicalisation. However, some typical indicators of an individual who may be a cause for concern in the context of radicalisation are listed below. The same indicators could also point to other causes for concern e.g. mental health issues, domestic abuse, and alcohol or drug abuse. These indicators include significant changes in:

- Levels of engagement. The individual may go missing without notice or begin to attend/engage erratically.
- Performance. Standards or patterns of work may deteriorate significantly. The individual might start to miss deadlines or meetings in contrast to previous performance.
- Appearance. The individual may begin to dress in a significantly different manner.
- The way an individual sounds or speaks. The individual may suddenly become very quiet or very loud, or become very agitated.
- Mood. The individual's mood may differ from what is usual for them.
- Behaviour. The individual may begin to behave in a very unusual, hostile or aggressive manner.
- Interests and views. The individual may take an interest in and express radical views or express sympathy for those who uphold radical views.

Other *possible* contextual indicators include:

- Family tensions resulting in a sense of isolation.
- A sense of isolation as a result of feeling or being treated differently.
- Migration. Living and studying or working in a different country.
- Distance from cultural heritage. Not feeling comfortable in their surroundings resulting in an identity crisis.
- Experience of racism or discrimination resulting in a sense of grievance.
- Feeling of failure. Unmet aspirations.
- Criminality. A time in prison. Previous involvement with criminal groups.

Although you may feel that the concern you have is relatively small and possibly isolated, you are encouraged to share it with the Director of SEWS because others may have already shared similar concerns and when considered together, these multiple concerns could present a very compelling argument for either safeguarding intervention of a general nature or intervention by the Head of Governance and Company Secretary if there is a suggestion that it is a Prevent-related matter. The Director of SEWS will record any concerns and action taken in our Safeguarding Referral Form, as will the Head of Governance and Company Secretary if any issues are referred on to her by the Director of SEWS. See **Appendix B**. The completed forms and any accompanying evidential documents will be stored by the owners in a secure site (be it in electronic or hard copy format).

10. Referral of concerns regarding radicalisation

Bloomsbury Institute has a duty to refer anyone suspected of being engaged in illegal terrorist activity to the Channel Programme or, in more serious cases, to the Police, and to prevent people being drawn into terrorism. We also have the option of discussing any concerns we might have with a number of

experts in this area. See **Section 12** on Channel. However, we have to balance our duty here with a commitment to freedom of speech and the requirements of legislation such as the Data Protection Act 2018, the UK General Data Protection Regulation (UK GDPR), and the Equality Act 2010. See **Appendix A** for details of the legislative framework within which we are required to operate. The Head of Governance and Company Secretary in her role as Prevent Lead, is ultimately responsible for making the above judgement in consultation with our Head of Compliance.

The Head of Governance and Company Secretary is also responsible for determining whether any concerns raised are serious enough to warrant a referral and, if they are, the body or agency to which the referral should be made. The Head of Governance and Company Secretary will make the decision based on evidence gathered following any safeguarding referral of a Prevent nature by the Director of SEWS.

It is important to remember that any concerns regarding a student or staff member should be treated with discretion. Information about the individual concerned should only be shared on a “need to know” basis with due regard to the Data Protection Act 2018 and the UK General Data Protection Regulation.

See **Appendix C** for summary details of the referral process.

11. Partnerships

Our Local Authority - Camden Council - has a Community Safety Partnership which manages crime and public safety issues. One of its key priorities is tackling hate crime, preventing extremism and building community cohesion. At the heart of this activity is Camden Council's Prevent Programme Manager.

We also have a DfE FE/HE Regional Prevent Co-ordinator and Prevent contacts within our partner institutions. These contact details are maintained by the Head of Governance and Company Secretary.

Our Prevent Lead is a member of the London HE Prevent Network.

12. Channel

Channel is an early intervention process designed to safeguard vulnerable people from being drawn into violent extremist or terrorist behaviour. Involved in the process are a range of multi-agency partners⁷ which form part of a Panel chaired by the relevant local authority. Each Channel Panel is tasked with assessing the risk an individual might pose together with the support package needed for that individual. Each support package is tailored to the individual and his/her particular vulnerabilities. These may be in relation to health, education, employment, housing or faith guidance, for example.

Engagement with Channel is voluntary and so the consent of the individual concerned is required. The Head of Governance and Company Secretary can seek advice around Channel from the Prevent Co-ordinator at Camden Council, and the DfE FE/HE London Regional Prevent Co-ordinator. Contact details for both have been included in our Prevent Referral Process document.

13. Ways of mitigating risks

There are a number of ways of mitigating risks which enhance and augment our work of creating an equal, inclusive and supportive environment, ensuring staff awareness and establishing information sharing mechanisms both internal and external. These include the following:

13.1 Management of external speakers and events

Our risk-based approach to complying with our Prevent duties can be seen in the way in which we balance the need for freedom of speech and academic freedom with our obligation to ensure the welfare of our staff and students. This approach is set out in our External Speaker Policy which outlines the

⁷ Social Care, Police, Health, Education, Probation, Housing, Youth Offending Service.

procedures we have in place for assessing risk in order to ensure that we do not unwittingly provide a platform for radicalisation and terrorism either within our premises or partner premises, online or through our Bloomsbury Radio broadcasts.

We have a formal procedure in place for seeking approval of an event at which an external speaker is to be invited. This involves completion of an External Speaker Request Form (Form A)⁸ by the event organiser and due diligence checks by the Head of Governance and Company Secretary⁹. If the Head of Governance and Company Secretary has any doubt about potential risks or where the Head of Governance and Company Secretary deems any potential risks as being medium or high, the Head of Governance and Company Secretary may seek additional information by consulting with the event organiser⁹ over completion of External Speaker Request Form B, and will discuss the Request Form with the Chief Operating Officer and Chief Financial Officer¹⁰. If the Head of Governance and Company Secretary judges that (a) there is a risk of the speaker expressing extremist views that risk drawing people into terrorism and that (b) we are unable to mitigate that risk¹¹ by ensuring that opposing views are expressed, we would cancel the event. We would also cancel the event if we were in any doubt about whether we could fully mitigate the risk.

In addition, the external speaker is required to abide by our policies in this area and, where appropriate, sign our External Speaker Assent Form.

13.2 IT policies

Staff and students using Bloomsbury Institute's PCs are subject to our institutional ICT policies which include an [Email Acceptable Use Policy](#) and an [Internet Acceptable Use Policy](#)¹². These policies address both Prevent and equality, diversity and inclusion issues.

13.3 Social media

We recognise that although there are many benefits from using social media in terms of reaching out to and engaging with others and building relationships, there are also a number of risks. Vulnerable individuals are particularly susceptible to radicalisation through social media platforms.

Our [Information Control Procedures](#) set out the internal procedures we have in place to ensure that all our institutional communications are accurate and (where applicable) that there is compliance with relevant legislative provisions. The Information Control Procedures also cover the use of online content and the regular audit of such content. These areas are also explored and regulated in our [Social Media Communications Policy](#).

Staff within our Marketing, Communications and UK Student Recruitment Department normally monitor our visitor posts every weekday, and are responsible for removing any inappropriate materials. In the event of any interventions being required, these would be recorded (and, if relevant, reported to the Prevent Lead) and procedures reviewed accordingly.

13.4 Branding

Our Marketing, Communications and UK Student Recruitment Department have developed Tone of Voice Guidance and Brand Guidelines. In addition, our Information Control Procedures make it clear that there are only a limited number of personnel who have authority to publish or change content available to the general public. It is, therefore, easy for us to control brand consistency.

⁸ Available from the CETL site on Canvas or the Head of Governance and Company Secretary.

⁹ In the absence of the Head of Governance and Company Secretary, the Head of Compliance will conduct the necessary due diligence checks.

¹⁰ In the absence of the Chief Operating Officer and Chief Financial Officer, the Head of Governance and Company Secretary will refer the request to the Head of School of Law.

¹¹ The ways in which we are able to mitigate risks are set out fully in our External Speaker Policy.

¹² <https://www.bil.ac.uk/qem/policies/>

Our Digital Communications and Alumni Officer is responsible for checking Google and all our social media channels every weekday for mentions of Bloomsbury Institute. We also have Google Alerts set up for any mention of our name on any websites. Both these measures will alert us to cases of our brand being misused.

14. Ethics Committee

Bloomsbury Institute staff and any students undertaking collaborative research with one of our staff members, are required to comply with our [Research Ethics Code of Practice](#). Our procedures specifically reference those who have a legitimate need to access groups or materials that may be construed as terrorist or extremist. In this way, we are able to provide students and staff with a safe space in which to pursue their legitimate research interests.

Our [Research Ethics Code of Practice](#) sets out very clearly the approval process in the case of potentially highly sensitive topic areas and includes provision for the Chair of the Research Ethics Committee to request that any research proposal be considered by the Prevent Lead prior to the proposal being considered by the Research Ethics Committee. In addition, the Prevent Lead may be asked by the Chair of the Research Ethics Committee to make a recommendation to the Research Ethics Committee with regards to research ethics approval in relation to the research topic.

15. Gender segregation

We are committed to promoting a general culture of equality, diversity and inclusion throughout our staff and student community. Our responsibilities in this respect are set out in our [Equality, Diversity and Inclusion Policy](#) which, in turn, is determined by our obligations under the Equality Act 2010. In line with these obligations, we will not allow organised segregation of any form at lectures, seminars, meetings or events of any kind. The only exception we would make to this ruling would be in the case of collective religious worship or observance. Instead, we support the right of people to sit or stand in any particular groupings that they choose to form.

16. Potential terrorist incidents

We provide our staff with advice and guidance on how to identify and respond to a terrorist incident. This information is contained within a procedures document that is one of the key company documents that all staff are required to read.

17. Review of the Prevent Policy

Our Prevent Policy will be subject to formal review by the Head of Governance and Company Secretary on an annual basis unless risk factors change or a situation presents itself that warrants an immediate review. In the case of the latter any amended documents will be submitted at an emergency meeting of our Senior Management Team.

18. Related regulations, policies and procedures

Bloomsbury Institute

- Safeguarding Policy
 - Safeguarding Referral Form
 - Safeguarding Referral Process
- Data Protection Policy
- Equality, Diversity and Inclusion Policy
- External Speaker Policy

- External Speaker Request Form A
 - External Speaker Request Form B
 - External Speaker Assent Form
- Information Control Procedures
- Internet Acceptable Use Policy
- Email Acceptable Use Policy
- Research Ethics Code of Practice
- Social Media Communications Policy

Appendix A: The Legislative Framework for our Prevent Policy

The following list is not exhaustive.

- Computer Misuse Act (1990)
- Communications Act 2003
- Copyright, Designs and Patents Act 1988
- Counter-Terrorism and Security Act 2015
- Counter-Terrorism and Border Security Act 2019
- Criminal Justice and Immigration Act 2008
- Criminal Justice and Public Order Act 1994
- Data Protection Act 2018
- Education [No 2] Act 1986
- Equality Act 2010
- Freedom of Information Act (2000)
- UK General Data Protection Regulation (UK GDPR)
- Higher Education Act 2004 covering Academic Freedom
- Human Rights Act (1998)
- Malicious Communications Act 1988
- Obscene Publications Act 1959
- Offences against the Person Act 1861
- Revised Prevent duty guidance for Higher Education Institutions in England and Wales (April 2019)
- Prevent duty: Framework for monitoring in higher education in England 2018-19 onwards (September 2018)
- Protection from Harassment Act 1997
- Public Meeting Act 1908
- Public Order Act 1986
- Regulation of Investigatory Powers Act (2000)
- Terrorism Acts 2000 and 2006

Appendix B: Safeguarding Referral Form

CONFIDENTIAL

Safeguarding Referral Form

Section A: Personal details of the person about whom there is a safeguarding concern

Name	
Date of Birth	
Job Role or Student Number (if relevant)	
Address	
Telephone Number	
Email Address	

Section B: Person reporting the incident/concern

Name	
Job role or student number as applicable	
Telephone Number	
Email Address	
Relationship to student or staff member	

Section C: Reasons for Referral

<p>Outline the reasons for the referral.</p>
--

Section D: Action Taken

Outline any action taken (and by whom) prior to referral of the incident or concern.

Detail any conversations that have taken place with the individual concerned regarding the above, indicating who has been involved in those discussions.

Section E: Other staff informed

Name(s)	
Position	

Name(s)	
Position	

Name(s)	
Position	

Section F: External partners informed

Name	
Position/Organisation	
Contact details	

Section G: Form completed by

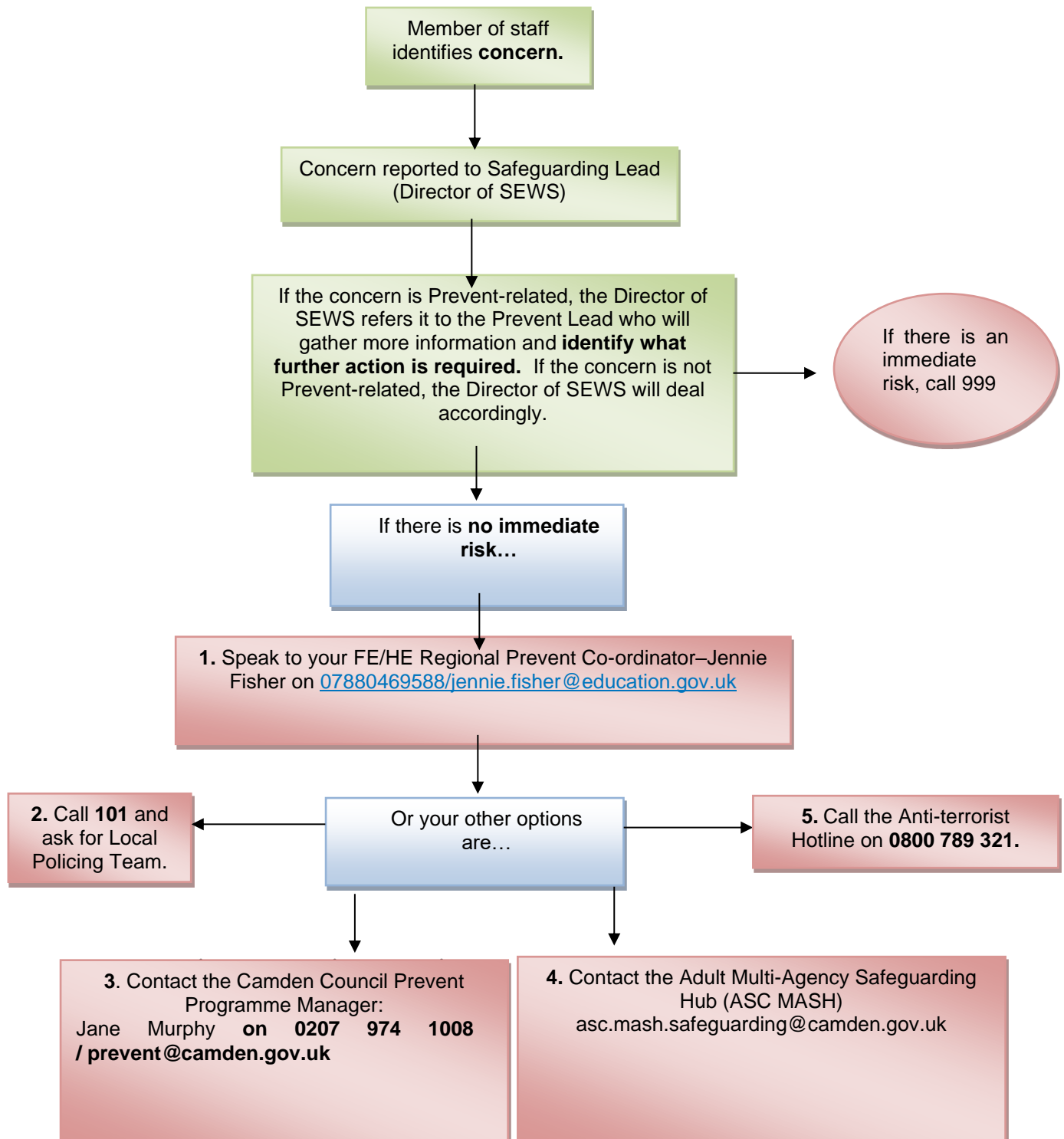
Name	
Signed	
Date	

CARE: This information is confidential and should only be shared on a “need to know basis” if it will protect the individual about whom the safeguarding concern has been expressed or if it will protect those around the aforementioned individual.

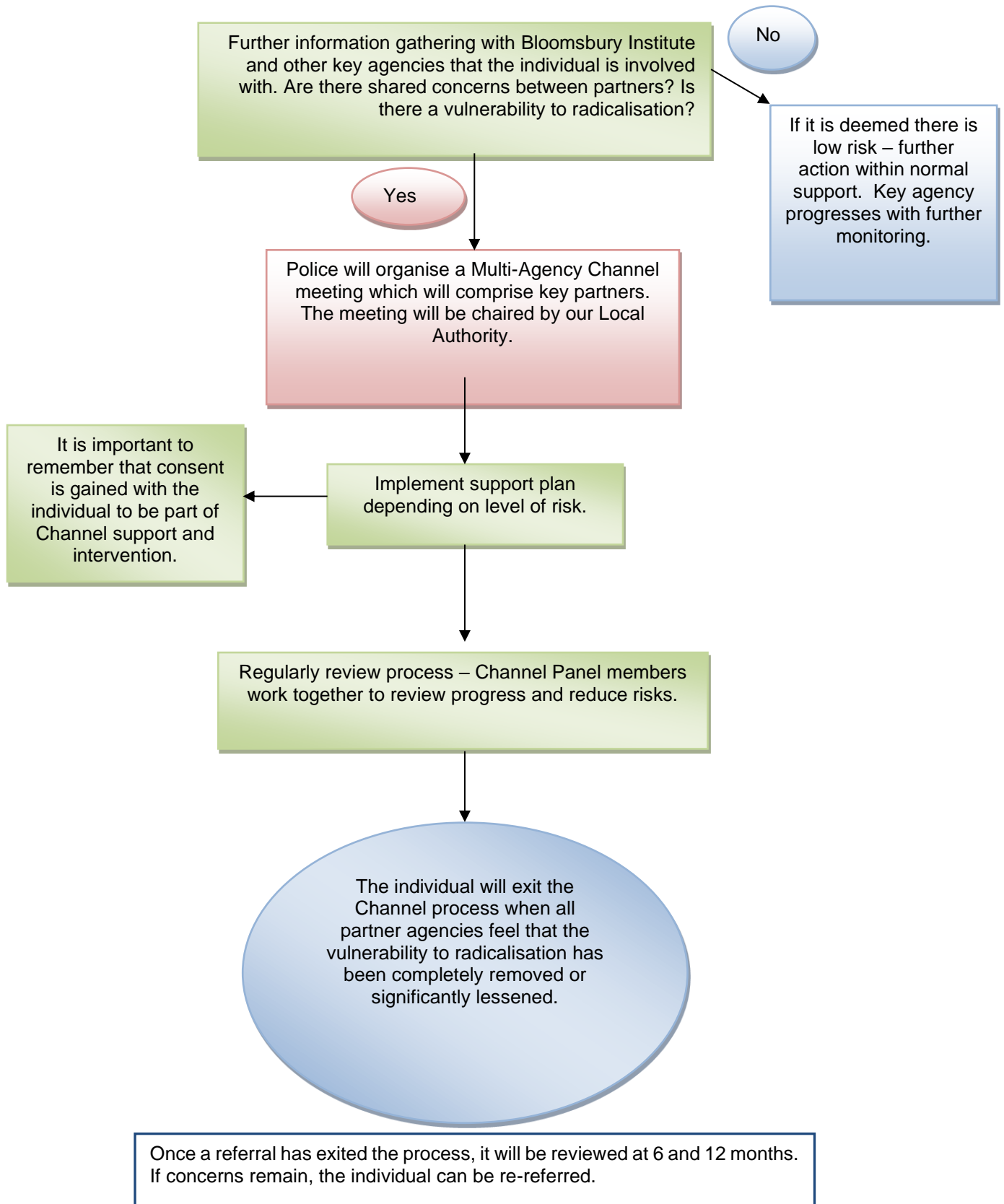
Appendix C: Prevent and Channel Referral Process

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 to be followed:



Once a referral has been made and enters the Channel process, the below process map illustrates what happens next...



Once a referral has exited the process, it will be reviewed at 6 and 12 months. If concerns remain, the individual can be re-referred.