

Prevent Policy

CONTEXT

1. New College of the Humanities (the College) acknowledges that it has a number of key obligations laid out in law. These obligations are enumerated in the College's Code of Practice on Freedom of Speech, which governs the College's approach to the holding of extra-curricular meetings and events and the hosting of external speakers¹. Since 18 September 2015, the College must report activities outlined in this Policy to the Regional Prevent Coordinator. This document identifies how the College complies with its obligation under the UK Government counter-terrorism strategy (CONTEST).

OBJECTIVES

2. The objectives of this policy are:
 - 2.1 To uphold the legal duties imposed upon the College
 - 2.2 To remain true to the mission and vision of the College
 - 2.3 To continue to work with a range of external organisations including, but not limited to: OfS, QAA, local authorities, DfE, the police and UK Government security services, NUS training providers, and specialist external advisers
 - 2.4 To follow our Code of Practice on Freedom of Speech
 - 2.5 To follow our process for reporting a concern of a vulnerable individual
 - 2.6 To have an [Acceptable Use Policy for Students \(I.T.\)](#) which complies with CONTEST
3. This policy will be published on the College website and will be reviewed periodically or in response to changes in Government policy.

BACKGROUND

4. The full CONTEST strategy outlined by the Government can be found [here](#). As part of the CONTEST strategy, Prevent aims to:

¹ An external speaker is a person(s) who is not a member of the College and who has been invited to speak at an event for the purposes that are not a designated part of an academic programme of study, research activity or an academic offer. This definition includes pre-recorded, streamed or broadcast materials from an external speaker. External speakers exclude persons who have been awarded the title 'Fellow' and networking events organised by professional or faculty staff. A member of the College includes faculty and professional staff, students, alumni and board members.

- 4.1 Respond to the ideological challenge of terrorism and the threat faced by the UK from those who promote it
 - 4.2 Prevent people from being drawn into terrorism and ensure they are given appropriate advice and support
 - 4.3 Work with a wide range of sectors (including education, criminal justice, faith, charities, the internet and health) where there are risks of radicalisation which need to be addressed
5. The full Prevent Strategy outlined by the Government can be found [here](#).

DEFINITIONS

6. Terrorism is defined in the Terrorism Act 2000 as:
- The use or threat which: involves serious violence against a person; involves serious damage to property; endangers a person's life (other than that of the person committing the act); creates a serious risk to the health or safety of the public or section of the public; or is designed seriously to interfere with or seriously to disrupt an electronic system. The use or threat of such action must be designed to influence the government or an international governmental organisation or to intimidate the public or a section of the public and be undertaken for the purpose of advancing a political, religious, racial or ideological cause.
7. Extremism is defined in the Prevent Strategy 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. We also include in our definition of extremism calls for the death of members of our armed forces.
8. Violent extremism defined in the Prevent Strategy as 'the endorsement of violence to achieve extreme ends.'
9. Radicalisation is defined in the Prevent Strategy as 'the process by which a person comes to support terrorism and forms of extremism leading to terrorism.'

SPEAKERS AND EVENTS

10. The College holds events, public meetings and lectures which may be led by an external speaker. In these circumstances, the organiser of the speaker or event will follow the [Code of Practice on Freedom of Speech](#) and the [Managing External Speakers Policy](#).

INTERNET ACCESS

11. The College will continue to manage its internet access and take action to block access to sites which fall under a category in the following list.
- 11.1 Violence/Hate/Racism
 - 11.2 Weapons
 - 11.3 Illegal Skill/Questionable Skills

11.4 Hacking/Proxy Avoidance Systems

12. This list has been provided by the College's internet service provider. The full list of sites and definitions can be found [here](#).
13. Anyone needing to use a blocked website for academic purposes should see: [ANNEX 1: Academic Exceptions To Review Extremist Material Online](#).

STUDENT ENGAGEMENT

14. The College recognises that the Student Union and Student Societies play an important role in safeguarding against radicalisation, by 'looking out' for fellow students, reporting extreme behaviour and contributing to the development of College policies.
15. The College has a procedure for reporting concerns about a vulnerable individual, and all staff and students receive training in this procedure. The procedure is outlined in [ANNEX 2 Process for reporting a concern of a vulnerable individual flowchart](#).
16. Attendance is monitored and registers are taken at teaching events ([Student Attendance Policy](#)).

TRAINING

17. Guidance from the Government suggests training should be given to help people identify potential signals that a student has become radicalised or is radicalising other students. Initial training is given to all staff during induction, student representatives and key members of the student union on commencement of their post and refresher training is given thereafter.

RECOGNISING POSSIBLE SIGNS OF RADICALISATION

18. The Government does not specify what the signs of radicalisation are; it is likely that the most obvious sign of radicalisation will be extreme change in behaviour and this will vary from case to case. This list is not exhaustive.
 - 18.1 Changes in ideology or faith
 - 18.2 Narrowing of political views
 - 18.3 Adoption of "Them" and "Us" mentality
 - 18.4 Isolation from friends and family
 - 18.5 Fervent public expression of strong anger or grievance about perceived injustice
 - 18.6 Attendance at certain rallies or meetings
19. The following College policies may help staff to identify any relevant changes in behaviour:
 - 19.1 [Student Welfare Policy](#)
 - 19.2 [Student Attendance Policy](#)
 - 19.3 [Student Complaints Policy](#)
20. These policies are available on Moodle and on the main College website.

PROCESS FOR REPORTING A CONCERN OF A VULNERABLE INDIVIDUAL

21. Any member of the College (student or staff member) may express concerns about any member of the College (student or staff member) potentially being drawn into violent extremism based on information received or behaviour observed.
22. Within the College, there are mechanisms for counselling, guidance and pastoral care. Changes in behaviour are identified using the current processes and staff are able to respond appropriately.
23. There may be circumstances where the College identifies someone who is suspected as being involved in terrorist-related activity. If this happens, the following steps will be followed, as per the flowchart: [ANNEX 2 Process for reporting a concern of a vulnerable individual](#).
 - 23.1 If anyone within the College believes that a student is involved in terrorist activity, then this must be communicated to the police.
 - 23.2 If a student or member of staff is concerned that a student is becoming radicalised or is radicalising others, this must be reported in the first instance to either the Registrar or the Student Wellbeing Coordinator (SWC). The Registrar or SWC will pass this on to the Prevent Officer (PO) if appropriate. The PO will investigate the matter.
 - 23.3 If a student or member of staff is worried that a member of staff is becoming radicalised or is radicalising others, this must be reported to the HR and Operations Manager (HROM) in the first instance. The HROM will pass this on to the PO if appropriate. The PO will investigate the matter.
 - 23.4 The PO will investigate, gather more information and discuss the case with all relevant internal and external parties. The outcome will be recorded on their student record or on their staff file.
 - 23.5 Three potential outcomes are likely at this stage:
 - 23.5.1 Stage 1: No further action is required and this will be recorded on their student record or on their staff file. The relevant Head of Faculty (HoF), Personal Tutor (PT) (students only), the SWC (students only), the Registrar (students only), the HROM (staff only), the Chief Operations Officer (COO) (staff only) and the Master will be informed
 - 23.5.2 Stage 2: There is substance to the case but at this stage only internal action is required. The exact nature of the intervention required will be determined by discussion between the PO, the Registrar (students only), the HROM (staff only), the COO and the Master. The PO will secure the explicit consent for actions from the Master, the Registrar (students), the HROM (staff) and the COO, who will determine the actions to be taken, the date of next review, and the periodicity of

review as necessary. This will be recorded on the student or staff file. The relevant HoF, PT and the SWC will be informed. The case will be reviewed on a weekly basis or monthly basis and the appropriate actions taken. Where necessary, the College will refer the person to the Channel process ([ANNEX 3: referral and Channel process](#)). Should the College refer someone to the Channel process, the PO will attend the relevant meetings when required.

- 23.5.3 Stage 3: There is an immediate threat of criminal activity or to the safety of an individual or other party. In this case the PO will liaise with the police immediately.
24. All staff, to the extent permitted by law, will support the Police in their work.
 25. Any requests for information from the Police will be authorised by the College Boards Liaison Committee, or in the event of an emergency, the Master or COO.
 26. When considering a request, the College will meet the requirements of the Data Protection Act (1998) (DPA), General Data Protection Regulation (DPR) and the Common Law Duty of Confidentiality; and must satisfy itself that there is a legal duty to disclose, or there is a sufficiently important reason to disclose and a legal basis for doing so.
 27. In accordance with the DPA, personal data will only be passed to the relevant authorities, in the instance that a request for information is made, with a police warrant. In sharing such information with external parties, the College will share only sufficient and relevant information in order to allow the concern to be appropriately followed up. The College will keep confidential records of the information shared. These will be kept in accordance with the DPA (1998) and the GDPR
 28. Contact with the Regional Prevent Coordinator is the responsibility of the PO who will be responsible for coordination with relevant bodies in the event of the College having concerns.
 29. The PO will also:
 - 29.1 Attend any training or conferences required to keep up to date on Prevent issues
 - 29.2 Keep the Prevent Strategy and Code of Practice on Freedom of Speech up to date

PREVENT POLICY

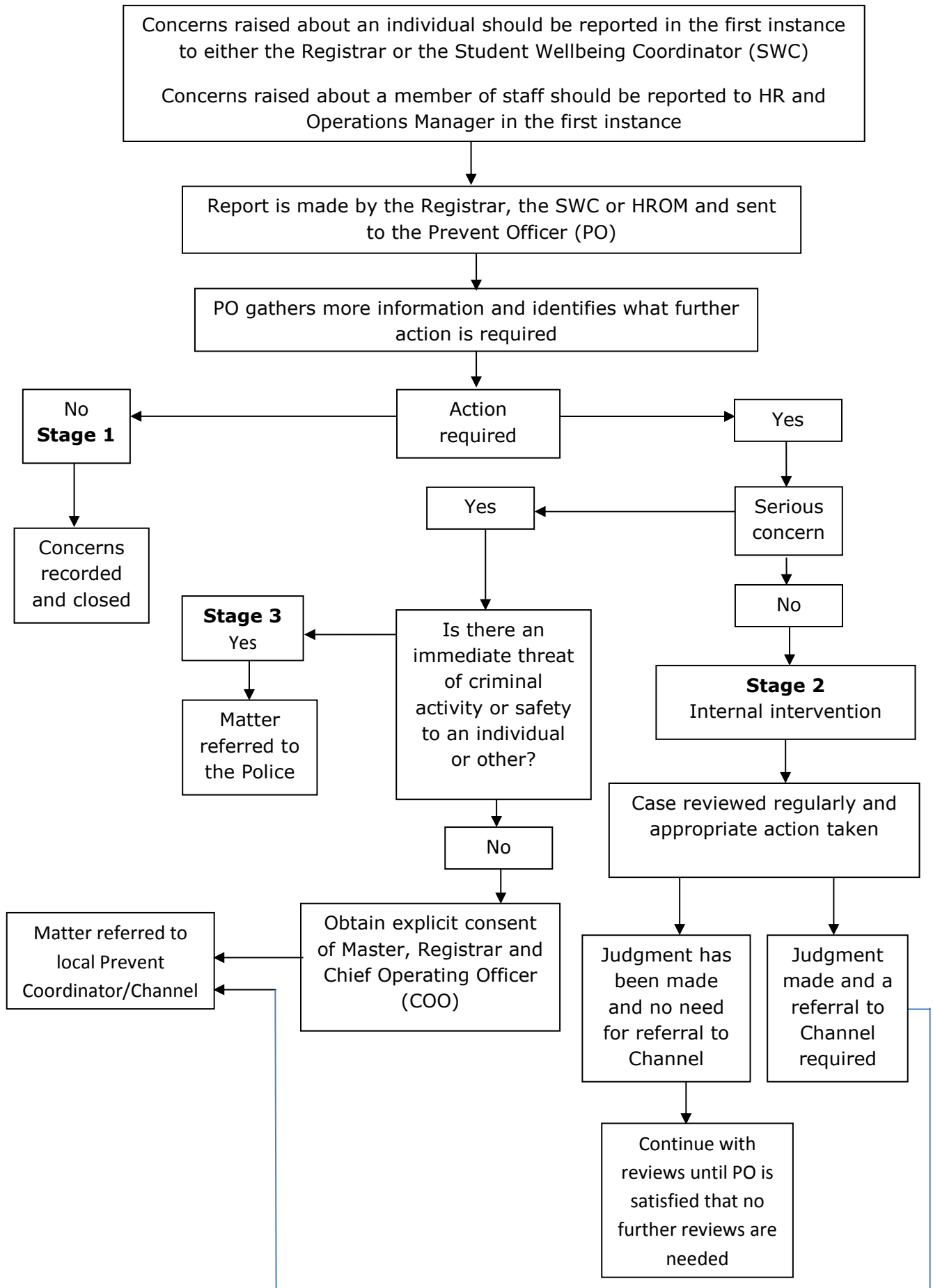
Title	Prevent Policy	Author	Prevent Officer
Location	NCH Academic Handbook	Approved by	Academic Board
Version	2.2	Last updated	April 2018
Publication date	April 2018	Review date	April 2019
Related policies	Student Welfare Policy; Student Attendance Policy; Student Complaints Policy; Code of Practice on Freedom of Speech; Acceptable Use Policy for Students (IT); Managing External Speakers Policy		
External Reference Point(s)	Prevent Strategy; CONTEST; Data Protection Act 1998; GDPR 2018; Regional Prevent Coordinator; OfS; QAA; local authorities; DfE; the Metropolitan Police; UK Government security services; NUS training providers; specialist external advisers; Terrorism Act 2000; UK Quality Code: Learning and Teaching; Course Design and Development		

ANNEX 1: ACADEMIC EXCEPTIONS TO REVIEW EXTREMIST MATERIAL ONLINE

1. Should a faculty member wish to review extremist material online (which ordinarily would have been blocked by the College), they should complete a form which the College provides on the staff intranet.
2. The form should be completed to enable the academic to view such material at the College's premises.
3. Where possible, academics should use designated College PCs for viewing the material.
4. Should students be required to view extremist material online as part of their degree or diploma studies, Course Leaders should complete the form on their behalf and identify students by name.
5. The form includes:
 - 5.1 A start and end date of research
 - 5.2 Target restricted sites
 - 5.3 Purpose of research
 - 5.4 Name(s) of researcher
6. Once the form has been submitted, the Prevent Officer (PO) will discuss the request with the Master. If the request is approved, the Facilities Coordinator will enable access for the relevant individual(s). The faculty member will be notified of the outcome of the request and how access will be granted by the PO. The PO will create an annual report, detailing access requests.
7. Faculty accessing restricted sites for teaching purposes are advised to inform their Head of Faculty for transparency.

ANNEX 2: PROCESS FOR REPORTING A CONCERN OF A VULNERABLE INDIVIDUAL

FLOWCHART



ANNEX 3: REFERRAL AND CHANNEL PROCESS (INFORMATION ONLY)

THIS FLOWCHART MUST BE USED IN CONJUNCTION WITH THE STATUTORY GUIDANCE FOR CHANNEL PANEL MEMBERS AND PARTNERS OF LOCAL PANELS

