

## Prevent Policy

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### INTRODUCTION

1. Section 26 of the Counter-Terrorism and Security Act 2015 (CTSA 2015) places a duty on New College of the Humanities, in the exercise of their functions, to have 'due regard to the need to prevent people from being drawn into terrorism'.
2. The Revised Prevent Duty guidance: for England and Wales is issued under section 29 of the CTSA 2015 and states that the college must have regard to this guidance when carrying out the duty.
3. 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).
4. 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 speakers .
5. The College will:
  - 5.1. Uphold the legal duties imposed upon the College.
  - 5.2. Remain true to the mission and vision of the College.
  - 5.3. Continue to work with a range of external organisations including, but not limited to: ofs, QAA, ESFA, OFSTED, local authorities, dfe, the police and UK Government security services, NUS training providers, and specialist external advisers.
  - 5.4. Follow our [Code of Practice on Freedom of Speech](#).
  - 5.5. Follow our process for reporting a concern of a vulnerable individual as illustrated in Appendix B.
  - 5.6. Have an [Acceptable Use Policy for Students \(I.T.\)](#) which complies with CONTEST.
6. The full CONTEST strategy outlined by the Government can be found [here](#). As part of the CONTEST strategy, Prevent aims to:
  - 6.1. Respond to the ideological challenge of terrorism and the threat faced by the UK from those who promote it.

- 6.2. Prevent people from being drawn into terrorism and ensure they are given appropriate advice and support.
- 6.3. 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.
7. The full Prevent Strategy outlined by the Government can be found [here](#).
8. This policy applies to students enrolled at the College, those undertaking apprenticeships or work related learning programmes, work experience/shadowing placements or visitors to it. This policy also extends to College employees working off campus e.g., professional placements, visits to apprentice's place of work, widening participation and recruitment activities in local schools.
9. The College takes seriously its duty of care to students and in addition to the Prevent Policy the College also has a [Safeguarding Policy](#) and [Support to Study Policy](#) to ensure that students who may be vulnerable are provided with appropriate support.

## DEFINITIONS

10. 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.
11. 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. The Prevent Strategy also include in its definition of extremism calls for the death of members of our armed forces.
12. Violent extremism defined in the Prevent Strategy as 'the endorsement of violence to achieve extreme ends.'
13. 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.'

## GENERAL PRINCIPLES

### SPEAKERS AND EVENTS

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

## INTERNET ACCESS

15. 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.
  - Violence/Hate/Racism
  - Intimate Apparel/Swimsuit
  - Nudism
  - Pornography
  - Weapons
  - Adult/Mature Content
  - Cult/Occult
  - Drug/Illegal Drugs
  - Illegal Skill/Questionable Skills
  - Sex Education
  - Gambling
  - Alcohol/Tobacco
  - Hacking/Proxy Avoidance Systems
16. Anyone needing to use a blocked website for academic purposes should see: [ANNEX A: Academic Exceptions to Review Extremist Material Online](#).

## STUDENT ENGAGEMENT

17. 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.
18. 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 B Process for reporting a concern of a vulnerable individual flowchart](#).
19. Attendance is monitored and registers are taken at teaching events. ([Undergraduate Student Attendance Policy](#)). For apprentices there will be regular reviews of progress with the student and employer.

## TRAINING

20. 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. Employers of apprentices are provided with Prevent guidance.

## RECOGNISING POSSIBLE SIGNS OF RADICALISATION

21. 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;
- Changes in ideology or faith.
  - Isolation from family and friends.
  - Talking as if from a scripted speech.
  - Unwillingness or inability to discuss their views.
  - Narrowing of political views.
  - A sudden and disrespectful attitude towards others.
  - Adoption of "Them" and "Us" mentality.
  - Fervent public expression of strong anger or grievance about perceived injustice.
  - Increased levels of anger.
  - Increased secretiveness, especially around internet use.
  - Travelling for long periods of time but is vague about where they are going.
  - Buying or storing large amounts of chemicals for no obvious reason.
  - Attendance at certain rallies or meetings.

## PROCESS FOR REPORTING A CONCERN OF RADICALISATION

22. Any member of the College (student, apprentice or staff member) or employer may express concerns about any member of the College (student<sup>1</sup> or staff member) potentially being drawn into violent extremism based on information received or behaviour observed.
23. 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.
24. 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 B Process for reporting a concern of a vulnerable individual](#).
- 24.1. If a member of the College believes that another member of the College is involved in terrorist activity, then this must be communicated to the police.
- 24.2. If a member of the College is concerned that a student or apprentice is becoming radicalised or is radicalising others, this must be

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<sup>1</sup> The term 'employer' refers to the employer of an apprentice who are on an apprenticeship programme at the College.

reported in the first instance to the Prevent Officer PO: [studentsupport@nchlondon.ac.uk](mailto:studentsupport@nchlondon.ac.uk). The PO will investigate the matter.

- 24.3. If a member of the College is worried that a member of staff is becoming radicalised or is radicalising others, this must be reported to the Director of Operations and Resources (DOR) in the first instance. The DOR will pass this on to the PO if appropriate. The PO will investigate the matter.
- 24.4. 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.
25. Three potential outcomes are likely at this stage:
  - 25.1. Stage 1: No further action is required and this will be recorded on their student support/apprentice record or on their staff file as set out above.
  - 25.2. Stage 2: There is some substance to the concern but at this stage only internal action is believed to be required to support the vulnerable student. The exact nature of the intervention required will be determined by the PO in consultation with Student Support and Development (students only), , the DOR (staff only), and the CEO. The PO will secure the explicit consent for actions from the the DOR (staff) and the CEO, 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/apprentice or staff file. The relevant members of staff involved in any support or intervention will be informed. The case will be reviewed regularly and at a minimum on a monthly basis. Where it is felt by the PO and CEO there is a Prevent issue beyond that which the College can support the vulnerable student the College will refer the person to the Channel process ([ANNEX C: Referral and Channel Process](#)). Should the College refer someone to the Channel process, the PO will attend the relevant meetings when required.
  - 25.3. 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.
26. All staff, to the extent permitted by law, will support the Police in their work.
27. Any requests for information from the Police will be authorised by the Executive Committee (ExCo) or in the event of an emergency, the CEO or, in their absence, the Director of Academic Services.
28. When considering a request, the College will meet the requirements of the Data Protection Act (2018) (DPA), General Data Protection Regulation (GDPR) 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.
29. In accordance with the DPA, personal data will only be passed to the relevant authorities, where the College is satisfied that #26 has been

satisfied. 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 (2018) and the GDPR.

30. 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.
31. The PO will also:
  - Attend any training or conferences required to keep up to date on Prevent issues.
  - Keep the Prevent Strategy and Code of Practice on Freedom of Speech up to date.

### **REPORTING, MONITORING, AND REVIEWING**

32. The PO will report to the Executive Committee (ExCo) statistical information relating to Prevent on an annual basis. The PO will be supported in their work by the Prevent Duty Review Group (PDRG) which will include members of professional staff, faculty and Students Union. The PDRG will help to ensure that all areas of the College are engaged with Prevent and any issues with the policy or processes are identified and resolved promptly.
33. ExCo will report to NCHNL Board statistical information relating to Prevent on an annual basis.
34. ExCo will monitor the data and make recommendations as appropriate.
35. ExCo will review the policy and procedures for their effectiveness and the PO will implement the recommendations as instructed with the help of the PDRG.

<b>Title: Prevent Policy</b>					
<b>Approved by: Executive Committee</b>					
Version number	Date approved	Date published	Author	Location	Proposed next review date
4.0	September 2021	September 2021	PO	Academic Handbook/policies and procedures/ general	April 2025
3.0	June 2019	June 2019	PO	Academic Handbook/policies and procedures/ general	April 2021
2.2	April 2018	April 2018	PO	Academic Handbook/policies and procedures/ general	April 2019
Referenced documents					
Student Welfare Policy; Undergraduate Student Attendance Policy; Student Complaints Policy; Code of Practice on Freedom of Speech; Acceptable Use Policy for Students (IT); Managing External Speakers Policy Safeguarding Policy; Support to Study Policy.					
External Reference Point(s)					
Prevent Strategy; CONTEST; Data Protection Act 2018; 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 Theme: Learning and Teaching; Course Design and Development; ESFA; OFSTED					

## **ANNEX A: ACADEMIC EXCEPTIONS TO REVIEW EXTREMIST MATERIAL ONLINE<sup>2</sup>**

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**..
2. The **form** should be completed to enable faculty to view such material using the College's IT systems.
3. Where possible, faculty should use designated College PCs for viewing the material.
4. Should students be required to view extremist material online as part of their degree<sup>3</sup> 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 Dean of Faculty. If the request is approved, the Facilities Coordinator will enable access for the relevant individual(s). 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 for the Prevent Duty Review Group.
7. Faculty accessing restricted sites for teaching purposes are advised to inform their Head of Faculty for transparency.

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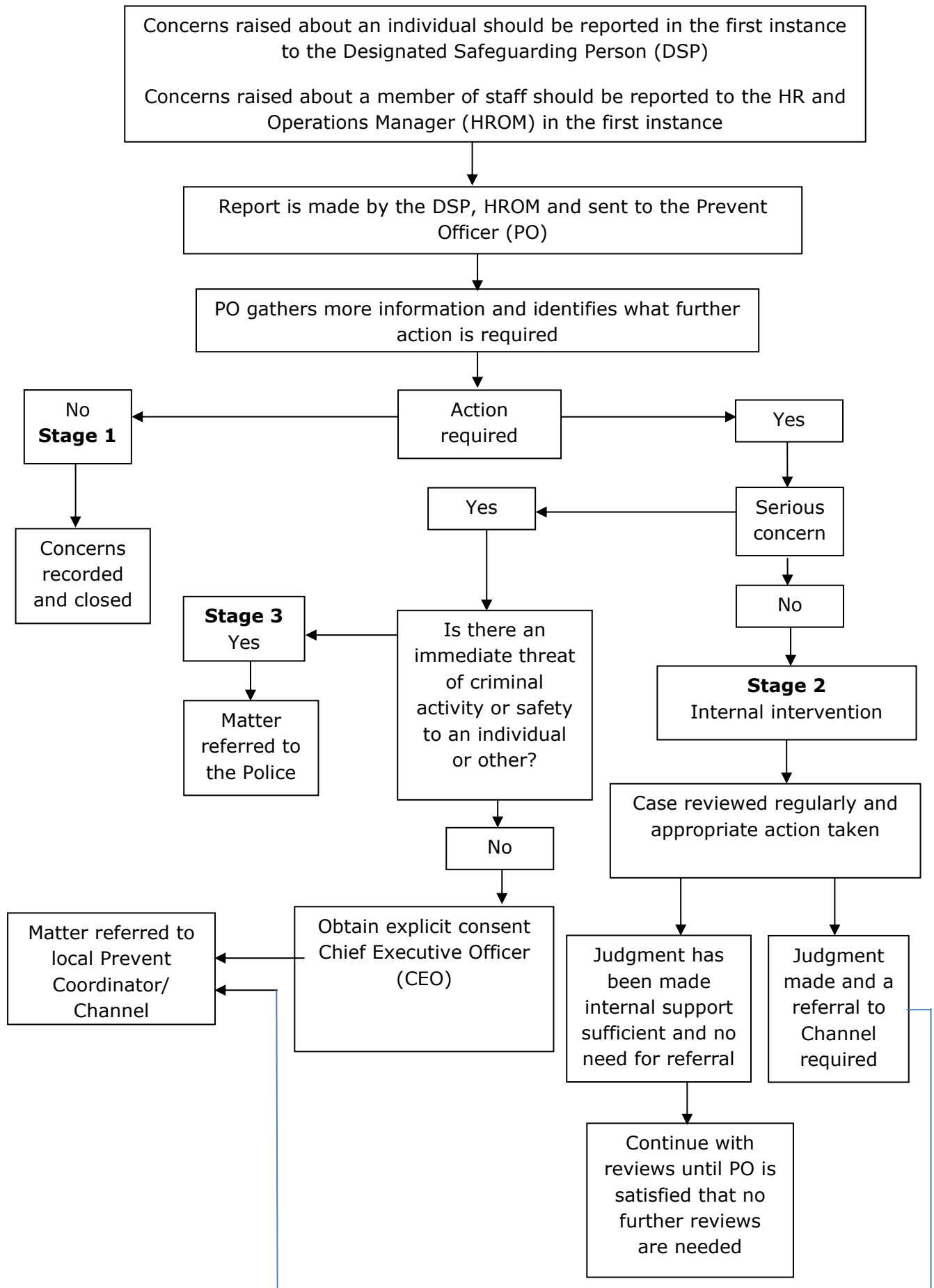
<sup>2</sup> ANNEX A is also published in the Code of Practice on Freedom of Speech

<sup>3</sup> 'Degree' refers to Undergraduate Degree, Postgraduate (Taught) Degree or Degree Apprenticeship.



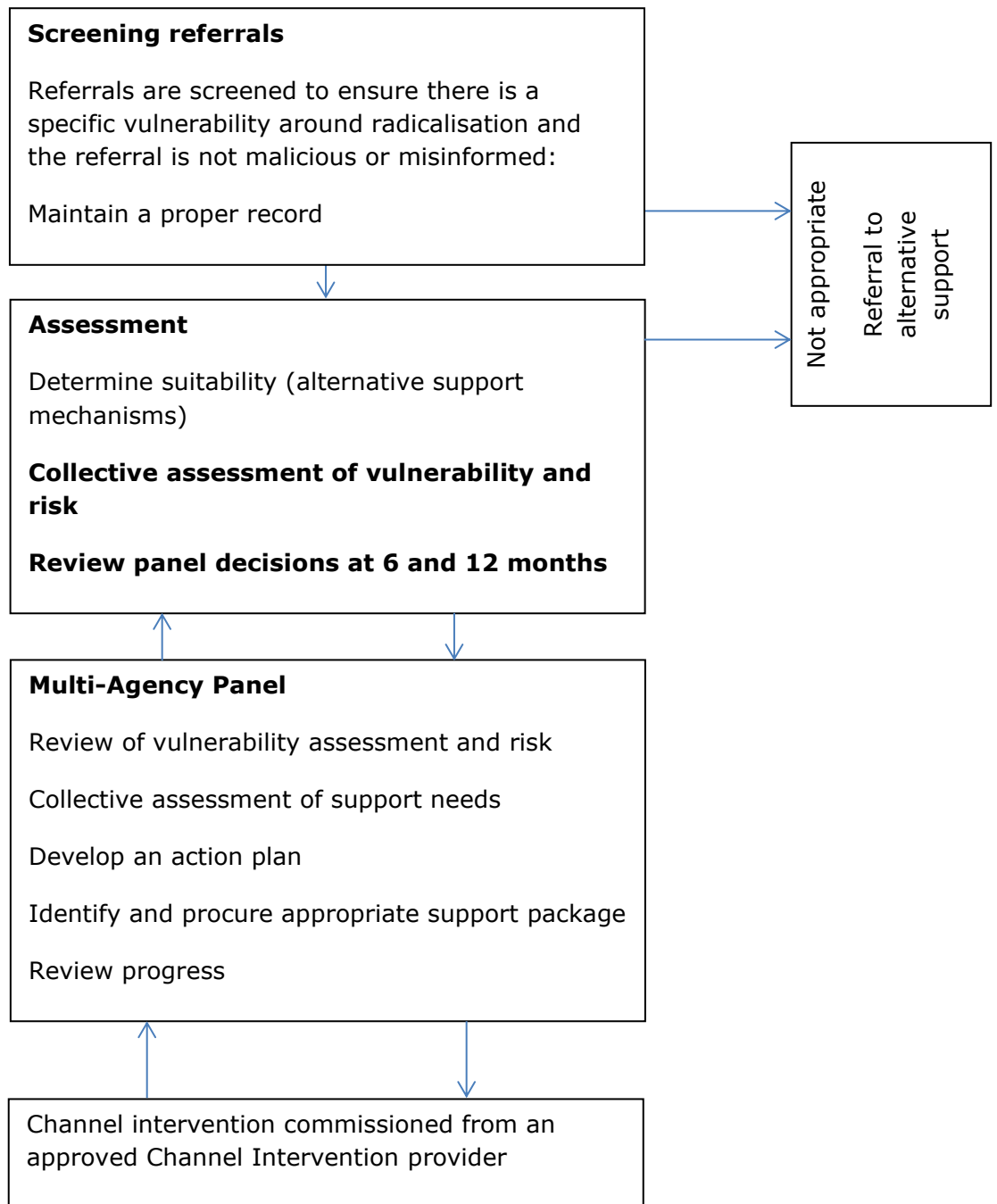
**ANNEX B: PROCESS FOR REPORTING A CONCERN OF RADICALISATION**

**FLOWCHART**



**ANNEX C: 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\***



\*[Channel Duty Guidance: Protecting people vulnerable to being drawn into terrorism](#)