

Prevent Duty Policy

Group responsible:	Executive Team
Executive Team Member:	Director of Finance and Administration
Individual responsible:	Jonathan Mead
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1. INTRODUCTION

Under the Counter-Terrorism and Security Act 2015, London School of Theology is under a duty to have due regard to the need to prevent people from being drawn into terrorism on its campus. This is known as the 'Prevent Duty'. The obligations of LST under the Prevent Duty are separate from those already imposed by sections 19 and 38B of the Terrorism Act 2000, which, in summary, require people to report to the Police:

Any suspicion or belief that a person has committed a terrorist offence, where such suspicion or belief has been obtained in the course of a trade, business or employment; or

Information which might be of material assistance in preventing the commission or an act of terrorism or apprehending an offender. It should be noted that failure to make such a report is in itself a criminal offence.

LST is committed to ensuring a safe and secure environment for all those who live, work, and study on our premises and those who visit or hire our premises. It is in this context that LST will seek to meet its obligations under the Prevent Duty; to ensure that vulnerable individuals are safeguarded from being drawn into terrorism on our premises.

LST has taken a risk based approach to put appropriate measures in place to ensure that the risks of members of any of those people mentioned in section 5 below being radicalised are minimised, whilst at the same time balancing its other legal duties, including those of ensuring freedom of speech and academic freedom within the law and promoting equality and diversity across LST. This policy forms part of that approach.

2. LEGISLATIVE FRAMEWORK

This policy has been developed in accordance with the following regulations, policies and procedures. This list is not exhaustive:

- a. LST Safeguarding Policy and Procedures
- b. LST Code of Conduct, Conflict Resolution and Student Disciplinary Policy and Procedures
- c. LST Equal Opportunities Policy
- d. LST GDPR Privacy Notice
- e. LST ICT Policy and Procedure

- f. Protection of Freedoms Act 2012
- g. Equality Act 2010
- h. The Counter-Terrorism and Security Act 2015
- i. Terrorism Act 2000

3. SCOPE

The policy applies to all those who visit or live on the LST site. This includes:

- 3.1. Staff of LST, including permanent and part-time, paid and unpaid, visiting lecturers, volunteers and contractors engaged by LST, referred to hereafter as 'staff'
- 3.2. All students and their families, referred to hereafter as 'students'
- 3.3. All conference users, premises hirers (temporary or permanent), and other charity workers whose organisation(s) rent LST premises, referred to hereafter as 'hirers'
- 3.4. All visitors to the College, including prospective applicants (student and staff), those visiting members of the LST community or staying on the LST premises for any other purpose, referred to hereafter as 'visitors.'

4. DEFINITIONS

4.1. Terrorism: For the purposes of this policy, the statutory definition of "terrorism" should be applied where that term is used. That definition is taken from the Terrorism Act 2000, which defines terrorism as "the use or threat of action which involves serious damage to property; or endangers a person's life; or creates a serious risk to the health and safety of the public or a section of the public; or is designed seriously to interfere with or disrupt an electronic system. The use of threat must be designed to influence the government or to intimidate the public and is made for the purpose of advancing a political, religious, racial or ideological cause."

4.2. Extremism: The statutory Prevent Duty Guidance defines "extremism" 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 and calls for the death of members of our armed forces, whether in this country or overseas." Where the term "extremism" is used in this policy, it should be read and understood in the context of this definition.

5. POLICY

5.1. Risk Assessment: LST regularly reviews a Risk Assessment to mitigate, as far as possible, the risk of staff, student, or visitor becoming radicalised or radicalising others.

5.2. Support: Proposed and actual acts of violence will be treated in accordance with the legislative framework (see above) and the appropriate authorities informed. However it is LST's policy to support rather than censure those who find themselves being drawn into ideologies that advocate the use of violence. If concern is raised about someone, the Designated Prevent Lead should seek advice from the LST's Local Partners on, where appropriate, how to form a group to plan and carry out such support.

5.3 Confidentiality: A general principle for processing information is that information should only be shared with the consent of the subject of the information. In some circumstances however, it will not be appropriate to seek consent before sharing information with others and / or information can be shared where consent has been refused. Prevent Duty can be one of those circumstances.

5.4 Local Partnerships: LST shall maintain its partnership with the Community Safety Coordinator for Hillingdon Council and Prevent Lead and DfE's Prevent Team.

5.5 Training: The Designated Prevent Lead will ensure that all staff (including workers and volunteers) are given Prevent Duty training suitable to their role.

5.6 Monitoring:

Prevent Duty will be a standing item on the Executive Team's regular meetings. The Designated Prevent Lead will report any activity and the team will discuss what action might be put in place to mitigate the risk reoccurring.

Prevent Duty will appear on the regular Operational Report from the Executive Team to the Board of Trustees. The Board will monitor whether the Risk Assessment should be amended in the light of any events that may have been reported since their last meeting.

5.7 Speakers/Events: All External Speakers and Events will be treated in accordance with the LST External Speaker and Events Policy and adhere to the Speaker Code of Conduct.

5.7.1 LST Speaker Code of Conduct

5.7.2 LST Speaker and Event Policy

5.7.3 LST Speaker Referral Process

5.8 IT Policy and Procedure: The IT Department is responsible for ensuring that the principles, procedures, expectations and requirements of LST's Prevent Policy are embedded in the design and use of LST's computer facilities (hardware, software, networks, social media etc.), include where appropriate filtering arrangements with respect to academic activities that might require online access to sensitive or extremism-related material.

5.8.1 Induction week will include highlighting these policies and procedures to new and returning students and reiterate the LST's intolerance for any behaviour that causes others harm.

5.8.2 IT Filters are used as to prevent any behavior that causes others harm.

5.9 Incidence Management: The Hall Wardens should be trained to respond in the event of a terrorist incidence. Under such circumstances, the Emergency Services should be informed, the Emergency Procedure should be activated and the most appropriate action taken.

5.10 Demonstration Management: Given that users of our site do not see political or other demonstrations to be their natural response to current issues and given LST's location, this is not considered a serious risk.

5.11 Pastoral Support: Details of pastoral support offered at LST can be found in the Student Handbook and in the Pastoral Care Student Handbook available on LST's Hub, and also from the Prevent Lead, Student Committee, LST Pastoral Team.

5.11.1 On-campus. A variety of pastoral support exists for on-campus students. The Pastoral Team is available for any student welfare needs, overseen by the Chaplain. Pastoral support also includes Student Committee, Hall Wardens, Student Reps, Residential Tutor, Site Wardens, and Tutor Groups. Details of each can be found in the Student Handbook or in the Pastoral Care Student Handbook. Also, the wide use of the open-door policy adopted by lecturers and staff offers additional student and peer support.

5.11.2 Online. Online students have the same access and orientation to the pastoral support as on-campus students, including access to the pastoral team and chaplain and full email access to the lecturers and staff.

5.12 Faith Facilities: Worship in our chapel and prayer room are integral parts of LST community life. The Chapel can be used by students, booked for LST-sponsored events, and hired for external use. The Prayer Room is specifically designated as a quiet space for student use only. Both rooms are monitored regularly by the Pastoral team and the Student Committee.

5.13 Hirers: LST will vet those to whom it will hire out its premises. Speakers at events organised by Hirers will abide by the Speaker Code of Conduct.

5.14 Record Keeping: Should a concern be raised, written records should be made by the Prevent Lead and kept separately from the student, staff or hirer's personal data and in compliance with the GDPR Policy.

6. WHO IS AT RISK OF RADICALISATION?

Guidance is clear that there is no single way to identify who is likely to be vulnerable to being drawn into terrorism. The following personal circumstances can lead to someone becoming vulnerable to extremist ideology that could lead to their radicalisation:

6.1. Living in a conflict/war zone and/or observing acts of injustice can engender feelings of loss, grievance, insecurity, vulnerability and helplessness. Such people can be very vulnerable to indoctrination and radicalisation.

6.2. Experiencing loss of family members or witnessing perceived or actual injustice to someone you know, particularly if you are separated from family members can also lead to vulnerability to indoctrination and radicalisation.

6.3. A need for identity, meaning and belonging: particularly after experiencing peer, social, family or faith group rejection or isolation

6.4. Relevant mental health issues: Disorders such as anxiety, depression, PTSD and relational or personality problems can leave individuals particularly susceptible to radicalisation

6.5. A desire for excitement and adventure: Young people in particular are often influenced by views and opinions provided by online propaganda

6.6. A need to dominate others

6.7. Susceptibility to indoctrination

6.8. Dependence on relationships built on social media: vulnerable to those who have built a trusting relationship either in real life or on social media.

6.9. Being at a transitional time of life: e.g. moving to a new area or country, ending or starting a new relationship etc

6.10. Being influenced or controlled by a group: organisations intent on radicalising others can have an incredibly powerful and dominating effect on individuals

6.11. Opportunistic Involvement: people may be presented unexpectedly with an opportunity to become involved with groups or individuals they may not otherwise associate with. They may be taken by surprise by 'psychological hooks' that quickly take hold.

6.12. A desire for political or moral change: Some people could react strongly to the emotive subject of extremism and terrorism, often with disgust or outrage in some cases, this can lead to an overwhelming need for change, either political or more extreme.

7. INDICATORS OF RISK

The following symptoms **may** be expressed by someone who is at risk of radicalisation, however they may not express any of these symptoms and this list is not exhaustive:

- I. Evidence of withdrawing or isolating themselves from others and/or being secretive;
- II. Extreme moods (this could expressive itself in being either very quiet or withdrawn or very angry).
- III. Third party reports of concerns about behaviour e.g. Plans to undertake extended periods of travel to international locations known to be associated with terrorism
- IV. Exclusion of certain groups or individuals from activities which appears to be for extremist or discriminatory reasons
- V. Direct disclosure from the individual of vulnerability to being drawn into terrorism or extremism
- VI. Evidence of friends or family concern about vulnerability to extremism
- VII. Evidence of discriminatory treatment of other groups or individuals
- VIII. Evidence of non-compliance with normal expectations of behaviour or shared values within our society, in the context of the definition of "extremism"
- IX. Possessing, accessing or requesting extremist materials, unless authorised to do so for academic study through the usual Research Ethics process
- XI. Expression of extremist views and sharing of extremist materials including on social media
- XII. Use of extremist language; expressing openness to violent solutions to world problems
- XIII. Threats of violence
- XIV. Inviting visitors to College grounds who are a cause for concern in the context of this policy or attempting to distribute material promoting extremism.

8. RAISING A CONCERN

Any staff, student, hirer or visitor may identify concerns about an individual potentially being drawn into violent extremism or terrorism based on information received or behaviour observed.

If there is a threat to life and someone believes an individual to be in serious, immediate danger they should call the police emergency service on 999. They should also tell the Designated Prevent Lead, On-site warden, Residential Tutor.

8.1. LST Emergency Procedure

8.1.1. Under all other circumstances, anyone concerned should refer their concern just to the Designated Prevent Lead.

8.1.2. It is important to realise that it is not anyone else's responsibility to determine whether there is a genuine risk or to challenge the individual about their concerns. What is important is to refer any concerns under this process to someone who can deal with the situation in an informed manner.

8.1.3. Following receipt of a referral, the Designated Prevent Lead will decide, in consultation with the Executive Team, the best course of action. Depending on the seriousness of the concern, this could include a discussion with any or all of the following:

- The student's programme leader and tutor
- Prevent Liaison for DfE (Department for Education)
- Hillingdon Engagement Officer (a specialist team of the Hillingdon Police whose main aim is to support Colleges to recognise when a vulnerability exists and how to offer appropriate support to prevent the situation from getting any worse)

8.2. The aim is always to support the individual, to understand what is drawing them towards ideologies that promote violence and to offer suitable intervention measures. This may mean making a Channel Referral, through the Hillingdon Prevent Team, which is the means whereby such help can be accessed.

8.3. The Designated Prevent Lead will record all referred concerns and any actions suggested and taken.

9. DATA PROTECTION

9.1. Written records of any Prevent Duty concerns will be retained for as long as is necessary for the purpose for which it was obtained or as legally required or lawfully permitted.

9.2. Such written records will be held centrally and separately from a member of staff's or student's personal records.

9.3. All such records are kept in accordance with the Data Protection Act 1998. See the College Data Protection Policy for details.

9.4. In line with the terms of the Data Protection Act 1998, anyone for whom LST holds records is entitled to a copy of all their personal data held by us. An exception would be if the release of the information would interfere with the prevention, detection or investigation of a crime.

10. RESPONSIBILITIES, POLICY APPROVAL AND REVIEW

10.1. This document, as well as all other policy, procedure and guidance documents relating to students studying at LST, will be available to all, monitored regularly, reviewed, and evaluated bi-annually.

10.1.1. A Prevent Risk Assessment will be maintained by the Designated Prevent Lead and reviewed annually by the Executive team. It will assess: where and how students might be at risk of being drawn into terrorism, including both violent and non-violent extremism; institutional policies regarding the campus and student welfare; equality and diversity and the safety and welfare of students and staff; policies and procedures for events held by staff, students or visitors and relationships with external bodies and community groups; the physical management of the estate including who may use premises, or work in partnership with the institution.

10.1.2. A Prevent Action Plan, will be maintained by the Designated Prevent Lead and reviewed annually. It will identify action necessary for the continuing effective implementation of LST's the Prevent Policy, including timescales, responsibilities, accountability, success criteria and monitoring strategies.

10.2. Strategic oversight of LST's Prevent Duty Policy lies with the Executive Team under the oversight of the Board of Trustees, who have legal responsibilities under this Policy and are expected to familiarise themselves with this Policy on appointment.

10.3. Operational oversight of LST's Prevent Duty Policy lies with the Designated Prevent Lead who will be responsible for ensuring compliance with relevant external guidance, expectations and requirements (OfS, Middlesex University, etc) by:

- undertake relevant training in Prevent Duty procedures
- ensure the LST community receive training on Prevent Duty
- ensure their knowledge is kept up to date;
- act as a point of contact for those who have Prevent Duty concerns, receiving information and recording those concerns;
- act upon concerns as appropriate in the circumstances for example by making external referrals to Local Prevent Duty partners;
- monitor the implementation of this policy and procedure.

10.4. All staff and students are expected to familiarise themselves with this policy. The Director of Finance and Administration will work together with the Student Committee, ensuring that staff and students are appropriately trained and supported with respect to their responsibilities to understanding and implementing LST's Prevent Policy.

10.5. The Executive Team will bi-annually review and approve this policy.

10.6. The overall responsibility for achieving the objectives of this policy and ensuring its compliance rests with the Board of Trustees, who are also responsible for its final annual report. The Board of Trustees meets three times a year and Prevent Duty will be a standing item on the agenda.

10.7. The Academic Board is responsible for ensuring that the principles, procedures, expectations and requirements of LST's Prevent Policy inform teaching and learning activities,

and, where appropriate, that issues related to religious and other forms of extremism are integrated in the curriculum.

10.8. The Director of Finance and Administration is responsible for working with the Student Committee to ensure that all student owned policies are consonant with the principles, procedures, expectations and requirements of LST's Prevent Policy.

10.9. The Pastoral Care Committee is responsible for ensuring that the principles, procedures, expectations and requirements of LST's Prevent Policy are embedded in LST's pastoral care, including the sharing of information about vulnerable students internally and externally where appropriate.

11. POLICY COMMUNICATION

11.1 This document can be found on the LST HUB

11.2 This policy will be included in staff and student induction.