

Policy in response to PREVENT guidelines as part of the Counter Terrorism and Security Act 2015

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Modifications from previous version of document

Version	Date of issue	Details of modification
2.0	18/08/16	Updated monitoring processes and to reflect changed PREVENT lead
3.0	23/10/2020	Periodic review. Update to LSTM Prevent contact from Student Experience Officer to Academic Registrar.

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1 Introduction and Context

1.1 Background

One of the recommendations stemming from a recent Whitehall security review was to put PREVENT on a statutory footing, and as a result, a new statutory duty to have regard to prevent people being drawn into terrorism was introduced as part of the February 2015 Counter-Terrorism and Security Act. The duty applies to a number of public and other specified bodies, including colleges and certain education and training providers.

The PREVENT strategy has three specific strategic objectives:

- Respond to the ideological challenge of terrorism and the threat we face from those who promote it;
- Prevent people from being drawn into terrorism and ensure that they are given appropriate advice and support; and
- Work with sectors and institutions where there are risks of radicalisation that we need to address.

1.2 Implementation at LSTM

- Governors are aware of PREVENT and of the duty now placed on the organisation.
- Governors and board members, senior leaders and managers are actively engaged with external partners including police and local PREVENT coordinators.
- Where the education and training organisation is deemed high risk, there is a single-point of contact for PREVENT.
- The organisation has regular contact with HE and FE PREVENT coordinators.

2 Equality and Diversity

LSTM is committed to promoting equality of opportunity, combatting unlawful discrimination and promoting good community relations. We will not tolerate any form of unlawful discrimination or behaviour that undermines this commitment and is contrary to our equality policy.

3 Safeguarding

In line with our Safeguarding policy and procedures, LSTM's processes reflect our organisational commitment to keeping children and vulnerable adults safe.

4 Scope

This Policy and its processes apply to all School staff and students and guests of the LSTM when working on site.

5 Roles and Responsibilities

- 5.1 The Director of LSTM will sign off all policies and reports relating to PREVENT.
- 5.2 The Prevent Lead will ensure that all policies and processes are disseminated across the School and will be the point of contact for returns to the Office for Students and referrals through the Channel Programme.
- 5.3 Staff and students will undertake specific Prevent training and will ensure adherence to processes as well as looking out for signs of potential harm to individuals within LSTM.
- 5.4 The Board of Trustees will be kept aware of LSTM's response to the Prevent agenda and be able to make any contributions to this as deemed necessary.

6 Key aims of the policy

- 6.1 The key points that the PREVENT Duty should address are as follows:
 - To have due regard to preventing people being drawn into terrorism when considering all other factors relevant to carrying out their normal functions.
 - PREVENT 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.
 - Preventing people being drawn into terrorism requires challenging extremist ideologies.
 - HEI's should demonstrate awareness and understanding of the risk of radicalisation in their area or institution.
 - HEI's should demonstrate effective leadership, partnership working and appropriate capabilities.
 - Explicit understanding that any strategy employed must not in any way be covert.
 - HEI's must be mindful of Data Protection and Human Rights Acts as well as any local data sharing agreements
 - HEI's must maintain appropriate records to demonstrate compliance and to provide reports
 - HEI's must be aware of the Home Office arrangements for overseeing the Prevent activity and for addressing non-compliance with the new duty.
 - The following should be in place to moderate HEI activity:
 - External Speaker event vetting procedure (Triage)
 - Partnerships with Police and local authorities
 - Risk Assessment addressing how radicalisation may occur
 - Action Plan
 - Staff Training

- Sharing Information where appropriate regarding vulnerable people
- Welfare, pastoral care and chaplaincy
- Information Technology policies
- Input from student unions and societies including training
- Recording and reporting capability

7 LSTM approach to achieving the key aims

7.1 Engaging External Speakers

A 'TRIAGE' system is applied to external speakers and events such that, where individuals or organisations are well known to the School, there will be a 'light touch' approach to vetting of events.

Due to the fact that, in most circumstances, invitees are well known to the individuals and teams that have arranged the seminar, it would be overkill to apply the same rigour to all guests coming to LSTM to speak. In this case, LSTM will perform a triage system where a decision will be made as to the confidence and familiarity that teams have for particular individuals and organisations. Where it is known that the speakers have a proven track record and have collaborated with LSTM or its employees successfully in the past, they will be given a green light to go ahead with the event without excessive scrutiny.

Where little or nothing is known about the speakers or organisations, LSTM will ensure that the following guidance will be published and disseminated to all staff who may be involved in arranging such external speakers delivering talks and seminars within the campus:

- Sufficient notice of booking (generally at least 14 days) to allow for checks to be made and cancellation to take place if necessary;
- Advance notice of the content of the event, including an outline of the topics to be discussed and sight of any presentations, footage to be broadcast etc;
- A system for assessing and rating risks associated with any planned events, providing evidence to suggest whether an event should proceed, be cancelled or whether mitigating action is required (for example a guarantee of an opposing viewpoint in the discussion, or someone in the audience to monitor the event); and;
- A mechanism for managing incidents or instances where off-campus events of concern are promoted on campus.

7.2 Engaging Unknown Partners for Collaborative Research

Using local, national and international resources each group should ensure they have fully risk assessed any collaborative partner before engagement begins. This also forms part of the due diligence process adopted within the procurement of goods and services. Contractual terms within collaborative agreements specify the LSTM obligations to ensure adherence to the

PREVENT guidelines for all activities it is party to. All measures possible should be adopted to adequately assure LSTM that risk of non-compliance to PREVENT guidelines is taken in its delivery of education, research and social programmes across the LSTM portfolio. Where risks are identified it may be useful to put in place an action plan that will detail how the risks presented may be mitigated.

7.3 Learning and Teaching

The School will ensure that all staff directly or indirectly engaged in learning and teaching should be advised and given access to resources to help them dispense their duties in a manner consistent with the guidelines of Prevent. This should include training at induction, equality and diversity training, understanding how to assess risk and to put measures in place to safeguard against these risks. New joiners to the School should be guided to the relevant Prevent information held on the intranet pages.

The Academic Registrar will take responsibility for engaging with and consulting students on LSTM's plans for implementing the Prevent duty. Students will be asked to comment via a variety of well-established routes for soliciting feedback (focus groups, anonymous on-line questionnaire, Staff Student Liaison Committee and Boards of Studies). A briefing session will be offered to student representatives to enable them to act as an impartial point of contact for students wishing to discuss the guidelines within their peer group. The following initiatives will be implemented and embedded within LSTM welfare and student support policies:

Welfare Policies

Code of Practice on Student Engagement and Enhancing the Student Experience has been updated to include Prevent-related information.

Personal Tutoring

Training/guidance to personal tutors is now available to include information relating to Prevent. Meeting Report Form are updated to include sections for tutors to report any pastoral issues. Monitoring of personal tutoring meetings will ensure full engagement and include Prevent specific detail.

Chaplaincy Support

Work is underway to strengthen the links between LSTM and Faith Express, and we will also improve the information available to students on places of worship.

Prayer Room

Policies relating to the acceptable use of the prayer room and information regarding this to resource have been strengthened and the document has been placed on intranet.

Training

In addition to the mandatory on-line training, LSTM holds periodic events with the local coordinator or another suitably qualified individual to carry out an interactive training session for those staff working most closely with students e.g. welfare and support staff, lecturers and personal tutors. This would give staff an opportunity to discuss the strategy and how it will operate within LSTM.

7.4 Communication and Dissemination

To ensure that all groups and members of LSTM staff are aware of the commitment to the PREVENT guidelines and to communicate the resources available to help them achieve compliance, there will be a dedicated area on the staff intranet for all the information and resources to be held and accessed. Regular training events will be organised through the communications team via the School Staff Forum and through HR similar to the mandatory Equality and Diversity training that was successfully implemented recently in LSTM. Advice leaflets and poster campaigns will also be used to help staff and students to understand the ways in which they can remain compliant with current guidelines in respect of PREVENT (e.g. 'Giving Safely').

7.5 Sharing with regional coordinators

An approach to the relevant body within **Liverpool City Council** has been made to ensure that LSTM strategy and process is in line and takes into consideration the local and regional approach to PREVENT. LSTM will tie in with pre-existing strategies within the North West and have approached the NW area coordinator (Nigel Lund) for an initial meeting. Regular contact with external bodies will be maintained to ensure we are able to benchmark our processes and controls against similar organisations and with the relevant legislation. Groups such as UK Home Office, Research Integrity Office and others will be approached for on-going guidance on current issues. One of the most useful resources in this regard is the Channel Guidance:

https://www.gov.uk/government/uploads/system/uploads/attachment_data/file/425189/Channel_Duty_Guidance_April_2015.pdf

7.6 Information Technology Strategy

The IT department within LSTM has procured and installed dedicated software (Network Guardian) that will alert when potential terrorist material is trying to be accessed via the LSTM intranet. It will also block this content and send a weekly report to the head of IT informing them of this activity. This will be regularly reported through the PREVENT lead to senior management.

The [IT Acceptable Use Policy](#) (ITSPOL002) describes how LSTM analyses IT use across the school and how any potential miss-use is handled and escalated if necessary. It references and has regard to the Prevent Duty within the policy.

7.6 Staff Training

An 'all user' email is periodically sent out directing all staff and students reminding them of this policy and reaffirming our obligations as an organisation to adhere to the PREVENT strategy. A mandatory e-learning training package was used initially to ensure that all staff received an appropriate level of awareness training. It is also mandatory for all new starters to complete this training as part of their induction process. This training course: "Understanding Pathways to Extremism and the Prevent Programme" covers the following:

- Understand what extremism and radicalisation are and why it is important to discuss and address these
- Know the main elements of the Prevent strand of the government's CONTEST strategy
- Better understand what makes people vulnerable to radicalisation
- Know your responsibilities and recognise indicators that radicalisation might be taking place

In addition, a series of supportive posters are placed around LSTM buildings helping staff and students to act responsibly and to understand LSTM obligations in respect of the PREVENT strategy. In addition to this, regular training events' via communications team/School Staff Forum also take place.

7.7 Office for Students Monitoring

Each year, LSTM completes accountability and data returns to the Office for Students (OfS) under the Prevent duty which is assessed for compliance. The assessment by OfS also includes an assessment of risk of potential future non compliance as part of their monitoring framework. The Prevent Lead monitors these assessments and ensures that any issues highlighted are alerted to the relevant individuals who have responsibilities under this policy and implements any necessary changes.

The most recent monitoring assessment (June 2020) has concluded that LSTM **demonstrates due regard** to the Prevent duty and **is not at higher risk** of non-compliance.

7.8 Escalation Process at LSTM

Any individual or group thought to be at risk of radicalisation will be recorded and LSTM HR will be informed in order to form a plan as to how to take the situation forward and mitigate any potential for further risk to the School or community.

Where it is considered that local, regional or national Prevent coordinators or local authorities should be involved, this will be done in conjunction with the Global Director of HR. The Global Director of HR, Operational Director and relevant senior managers will work with the LSTM Prevent Lead to assess if a referral through the Channel programme is appropriate or, if the matter can be adequately resolved through internal policies.