



**London
South Bank
University**

EST 1892

Prevent Policy

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This Procedure is available in accessible formats on request from govlegal@lsbu.ac.uk.

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1. Introduction

- 1.1. LSBU recognises the need to protect people from being drawn into terrorism and to try to reduce the risk of unmitigated exposure to radicalising influences and ideological causes of terrorism. LSBU is required under the Counter-Terrorism and Security Act 2015 to have “*due regard to the need to prevent people from being drawn into terrorism*”. In carrying out this duty, LSBU must have regard to guidance issued by the Secretary of State. This policy sets out how LSBU is complying with this duty.
- 1.2. LSBU operates a Freedom of Speech Code of Practice. LSBU’s academic staff have freedom within the law to question and test received wisdom, and to put forward new ideas and controversial or unpopular opinions. However, any purported exercise of freedom of speech or academic freedom that is not within the law, for example that incites religious or racial hatred or incites anyone to violence, does not benefit from protection.

2. Scope – who is covered by this procedure?

- 2.1. This policy applies to all LSBU staff, students, apprentices, contractors, volunteers and visitors. The activities of such individuals taking place away from LSBU sites will also fall within the policy’s scope if they are undertaking activities that are, or are perceived to be, associated with LSBU.

3. Who is responsible for this procedure?

- 3.1. The Pro-Vice Chancellor Compulsory and Further Education has direct overall responsibility for ensuring compliance with the duty to prevent people from being drawn into terrorism, and chairs an established overarching Group Safeguarding Committee. This comprises a multi-disciplinary team of senior officers and officials of the Students’ Union. It monitors and oversees LSBU’s approach and receives information and reports from the local LSBU Safeguarding Committee. An annual Prevent report will be made to the Board of Governors via the Executive. The Board of Governors submits an annual return to the Office for Students.
- 3.2. The Director of Group Assurance and the University Solicitor will review this procedure from time to time (and at least every two years) to ensure that its provisions continue to meet our legal obligations and reflect best practice.

4. How to report concerns

- 4.1. If you are concerned that an individual is being radicalised and/or is in danger of being drawn towards terrorism, you should make a referral by following the process set out in Appendix A if you are a student or apprentice; and Appendix B if you are a member of staff.
- 4.2. **If someone is in immediate danger or is at risk of harm, a report should be made to the police immediately. If a crime is in progress or life is at risk, dial emergency services on 999.**

5. Staff Training

- 5.1. Mandatory training on how to protect people from being drawn into terrorism and to challenge extremist ideas which risk drawing people into terrorism is provided for all staff (including those working with apprentices) and any relevant contractors.
- 5.2. The training is required to be completed every 2 years, or sooner if the course content is changed. Completion rates by area are reported to the Group Safeguarding Committee. The University has a policy in place for dealing with the enforcement of all mandatory training completion. Those with additional Prevent responsibilities may be required to undertake further specific training as necessary.
- 5.3. The content of Prevent training is reviewed at least every 2 years, or sooner if there are changes to legislation, practice or areas of improvement are identified by the Group Safeguarding Committee.

6. Apprentices

Employers' Duty for Apprentices

- 6.1. Employers have a duty to comply with all current and future UK legislation and statutory responsibilities. There is a particular expectation that an employer should take responsibility for an apprentice's welfare in the workplace and to also seek appropriate advice when they feel an apprentice may be at risk in their personal lives. Employers of Apprentices should refer to LSBU's wider policies for details of the different University support provided and methods of incorporating information into their current internal procedures. Seek advice from the LSBU Apprenticeship Team as necessary.
- 6.2. The Employer's Role is to
 - Demonstrate a commitment to the principles that underpin the Prevent Duty.
 - Seek specialist support if any concerns are raised.
- 6.3. All apprentices studying on a programme at the University, will be expected to complete a compulsory e-learning module in which the above issues will be covered.

7. Risk Assessment and Action Plan

- 7.1. LSBU maintains and regularly reviews a detailed risk assessment and action plan. The risk assessment assesses where and how people at LSBU might be at risk of being drawn into terrorism. This includes not just violent extremism but also non-violent extremism, which can create an atmosphere conducive to terrorism and can popularise views which terrorists exploit. The action plan sets out the actions that LSBU will take to mitigate any risks. The risk

assessment and action plan are standing items on Group and local LSBU Safeguarding Committee agendas.

8. Sharing Information

- 8.1. The Pro-Vice Chancellor Compulsory and Further Education or a designated representative, along with the Director of Group Assurance, should be advised of any information requests relating to Prevent, extremism, terrorism or counter-terrorism information. Similarly, any information which the University intends to release to any other agency on this topic should be discussed in advance with the Pro-Vice Chancellor Compulsory and Further Education or a designated representative. The University handles all information in accordance with the General Data Protection Regulation and the Data Protection Act 2018 (as amended or superseded) and statutory requirements. The Data Protection and Information Compliance Officer should be consulted for advice as necessary.

9. External Speakers and Events

- 9.1. LSBU has an External Speaker Policy (that can be found on the LSBU website under About Us, Policies and Procedures tab) outlining a process and procedure for dealing with external speakers, both for events on and off campus.

10. Engagement with Students' Union

- 10.1. The University and the Students' Union recognise the need to challenge extremist ideas which risk drawing people into terrorism, and work in close co-operation to ensure that all students are protected and remain safe. The Students' Union is represented on the Group and Local Safeguarding Committees and works closely with relevant University staff. The Students' Union is specifically subject to this Prevent Policy and its associated policies and procedures.

11. Gender Segregation

- 11.1. All student led events are permitted on the understanding that gender segregation is not allowed. The only exception is in the use of single sex prayer rooms (see part 14). There is no gender segregation permitted in other non-student led University events.

12. Equality

- 12.1. People of any age, sex, faith and class may be vulnerable to being drawn into extremism and terrorism. Terrorism can be based on right wing extremism just as much as any other interpretation of ideology or faith. Assumptions should not be made about people's intentions or views based on outward appearances, denomination, allegiances or faith group alone.

13. Multi agency approach

13.1. LSBU is a member of the Higher Education London Regional Prevent Group. LSBU has regular contact with multi agency partners including the Local Authority and police and will co-operate with all relevant processes required by law.

14. ICT and Research

14.1. LSBU balances the need to protect and keep people safe with the requirement for lawful academic freedom. It should be noted that all web searches on LSBU computer equipment are traceable, and the University has a structured policy on the appropriate use of ICT and standard blocked sites.

14.2. Where you are legitimately required to research terrorism-related information online, you need to make an application in advance of starting the research. You can do this through LSBU Ethics Panel for Post Graduate research. Information is available on Moodle PGR site. Documents can be downloaded and emailed to ethics@lsbu.ac.uk. In cases of taught programmes, you need to complete the form contained in Appendix C and seek approval by the relevant Module Leader and then the Group Head of Security by emailing security-office@lsbu.ac.uk. You can contact the Group Head of Security for advice in advance of submitting the form.

15. Prayer Rooms and other Faith-Related Facilities

15.1. The University recognises the importance of having prayer rooms and other faith-related facilities, and for faith leaders to be made aware of this Prevent Policy.

15.2. LSBU works in close partnership with the Students' Union and its societies in all matters relating to the operation and use of prayer rooms and other faith-related facilities.

15.3. The Director of Group Assurance regularly meets with the Chief Executive of the Students' Union and Group Head of Security. Any emerging issue or concern relating to the use of prayer rooms or other faith-related facilities would be discussed at these meetings. Further dialogue may take place with any Students' Union affiliated society as necessary. All actions are reported back to and monitored by the Group Safeguarding Committee.

15.4. Documentation on the safe use of prayer rooms and other faith-related facilities is overseen by the Director of Student Services.

16. Security

16.1. Security procedures are in place to help safeguard staff, students and all users of the campus in the event of any terrorist incident and are continually reviewed in consultation with the police.

17. Audit

- 17.1. This Prevent Policy will be subject to regular inspection by Internal Audit and reporting to the Board of Governors.
- 17.2. In addition to the above, the Group Head of Security will conduct quarterly audit inspections of a random sample of external speaker requests. Reports will be produced for the Safeguarding Committee.

Appendix A

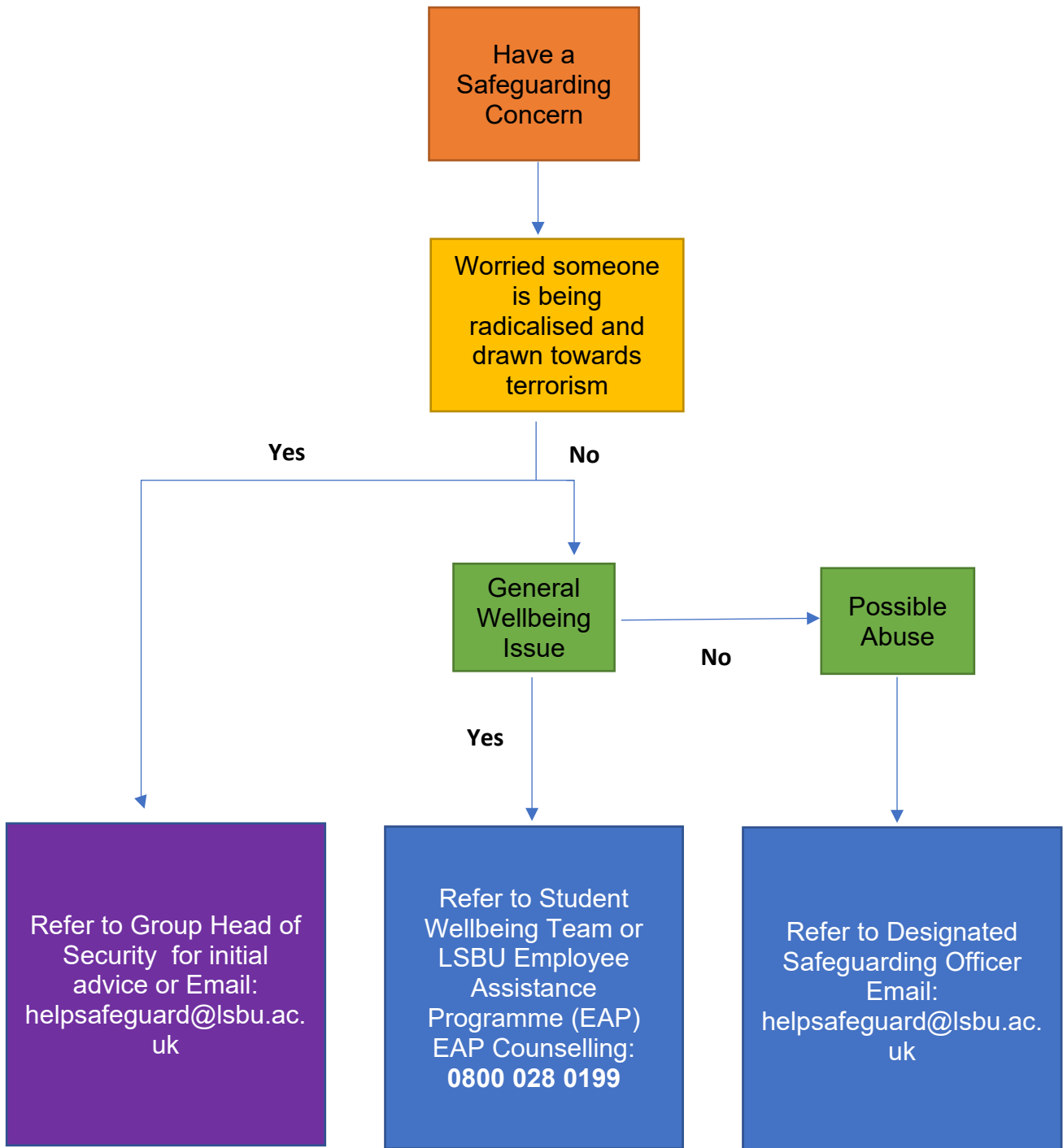
LSBU Safeguarding referral procedures for use by Students and Students' Union Officers

This process has been designed to ensure that where there is any doubt between whether an individual is suffering from emotional difficulties, mental health issues, or is subject to possible abuse or is being drawn into terrorism, the Student or Students' Union Officer just has to use a single point of contact.



Appendix B

LSBU Safeguarding referral procedures for use by Staff



The Student Wellbeing team will examine any general wellbeing issues using a range of established processes.

Considering the wider welfare support for those referred, involved, or affected by any issues in the flowchart.

How do I know if someone really is being drawn toward Terrorism?

1. **Seek advice** if you are not sure: call the **Group Head of Security**
2. There is **no unique** identifier or symptom of terrorism.
3. Radical views are any views which sanction the use of violence. It does **not only confine to religions and includes right wing issues**.
4. The referral is to allow appropriate checks to take place. If there are no issues, it will be quickly identified and resolved.



Appendix C

Approval Form – Research Terrorism Related Subject

Students are required to fill out the below form if they are to research terrorism related subjects as part of their module work.

Name:	
Student number:	
School:	
Module:	
Module leader:	
Assignment title:	
Brief description of subject area:	
Duration of research:	

Date (form submitted):	
Signature (student):	

Approved by Module leader (Print Name)	
Date:	
Signature:	

Approved by Group Head of Security:

Date:	
Signature:	