

PREVENT POLICY

1. Introduction and Context

1.1 Under the Counter-Terrorism and Security Act 2015, the University of the Arts London is under a duty to 'have due regard to the need to prevent people from being drawn into terrorism'. This is known as the '**Prevent Duty**'. UAL is committed to ensuring that it remains a safe, nurturing and inclusive environment for teaching, learning and research. It is in this context that the University will seek to meet its obligations under the Prevent Duty; to ensure that vulnerable individuals within the University community are safeguarded from being drawn into terrorism. The University has taken a risk-based approach to put appropriate measures in place at an institutional level to ensure that the risks of members of the University, both staff and students, 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 the University. This policy forms part of that approach.

2. Scope of this Policy

This policy applies to all staff and students at UAL and is designed to help you understand the responsibilities around the University's Prevent Duty, what to do if you think that someone is at risk of being drawn into terrorism and who to contact to get help if you are worried or unsure about anything.

3. Approach

UAL is committed to fostering an inclusive environment in which the principles of academic freedom and of freedom of speech underpin our educational institution. UAL is clear that in seeking to comply with the Prevent Duty,

- No processes or mechanisms will be created for the express purpose of monitoring or reporting students. Existing policies and practices will be used to ensure the safety and wellbeing of the University community.
- No referral of any student will be made to the authorities and/or the Channel Programme, without the express permission of the Vice Chancellor, following advice from the University Secretary and Registrar.

4. Information Sharing

The University is aware of the Channel process and of the opportunities for informal and formal sharing of information with relevant authorities. We will use these when we consider it is necessary and appropriate to do so in the interests of preventing people from being drawn into terrorism. Information sharing will only take place with external authorities when this is consistent with the provisions of the Data Protection Act

5. Communications

We will not permit material supporting terrorism to be displayed within University premises and will remove any such material if it is found. Likewise, we will seek to ensure that the University's printed and electronic communications (including its website) do not contain or support terrorist material or material likely to encourage terrorism and will investigate immediately if any such instances are raised. It is acknowledged that there will be legitimate reasons to display materials relating to terrorism as part of legitimate teaching and research activities, and this should be declared under the process described in paragraph

6. Referral of concerns regarding radicalisation

Any member of the University (student or staff member) may identify concerns about a student or staff member potentially being drawn into violent extremism based on information received or behaviour observed.

It is important that such concerns can be shared in a safe and supportive fashion to enable concerns to be investigated and an appropriate intervention to be developed, if required.

It is equally important that assumptions are not made on the basis of information received and that referrals are investigated thoroughly and fairly. UAL will seek to approach such concerns.

It is not your responsibility to determine whether there is a genuine risk or to challenge the individual about your concerns. What is important is to refer any concerns under this process. Guidance is clear that there is no single way to identify who is likely to be vulnerable to being drawn into terrorism. To assist you in understanding the factors that may have a bearing on someone becoming vulnerable and how to identify such concerns, a non-exhaustive list of potential indicators of risk is set out at **Appendix 1** of this policy. Following receipt of a referral, the next stage would be for the appropriate members of staff to carry out a review of the concerns raised; the purpose of such a review would be to clarify the concerns and any relevant circumstances surrounding the same. If a concern is raised about a student, the review will be led by the Dean of Students. If a concern is raised about a member of staff, the review will be led by the Director of Human Resources.

A decision will be made about the next stage based on the outcome of the review. There are three likely outcomes:

- a. **No further action is required under this policy.** In this case a confidential record of the case will be kept by the Dean of Students Support or the Director of Human Resources (as appropriate).
- b. **Internal action is required.** The appropriate intervention will be determined by agreement between relevant staff members, which should be supportive in nature. As above, a confidential record will be kept.

- c. **An external referral is required.** Depending on the nature of the concern, there are two routes available:
- i. referral to the Police if there is evidence to suggest that a criminal act may be committed or has been committed: or
 - ii. referral to the Regional Prevent Co-ordinator or to the Channel Programme (a multi-agency panel established as part of the Prevent agenda to identify and provide support to individuals who are at risk of being drawn into terrorism).

A confidential record of all external referrals made under this policy will be kept. In reaching any decision about external referral, the University will have regard to its obligations under its Data Protection Policy and the Data Protection Principles contained in it. Concerns will only be shared externally where there is a clear and compelling evidence of a requirement to do so. A flowchart setting out the process for reporting concerns is set out at **Appendix 2**.

Appendix 1

It is possible that from time to time staff or students at the University may notice incidents occurring at the institution which cause concern. Indicators of risk and/or identification of concerns might include the following, although this list is not exhaustive:

- Expression of views which are discriminatory against protected groups or individuals
- Exclusion of certain groups or individuals from activities which appears to be for extremist or discriminatory reasons
- Direct disclosure from the individual of vulnerability to being drawn into terrorism or extremism
- Evidence of friends or family concern about vulnerability to extremism
- Evidence of discriminatory treatment of other groups or individuals
- Possessing, accessing or requesting extremist materials, unless authorised to do so for academic study through the Research Ethics Committee approvals process
- Expression of extremist views and sharing of extremist materials including on social media
- Use of extremist language
- Threats of violence
- Enabling non-University members to access University grounds or buildings who are a cause for concern in the context of this policy or to distribute materials promoting extremism.
- Unattended bags or general items being left in or outside of the University buildings
- Staff or students behaving in a way that raises concern, such as: organising unauthorised meetings or events, threatening other members of the University, acting in an inappropriate way which could cause harm to themselves or others, or placing pressure on individuals to conform to a particular ideological viewpoint
- Individuals attempting to access a secure area without the appropriate permission or a valid security pass

Individuals may feel confused about the level of importance of what they have observed and unsure as to whether or not they need to pass on information.

However the University advises that everyone with any such concern - no matter how apparently insignificant - feels able to pass on this information. Such information may be passed on in person, by telephone, or by email to:

The University Secretary & Registrar: **Stephen Marshall**

The Director of Human Resources: **Naina Patel**

The Dean of Students: **Mark Crawley**

The Estates Director: **Steve Howe**.

Referral Flowchart

