

Prevent Duty Policy 2025-27

LCCA Governance



London
College of
Contemporary
Arts

ID: COS-006

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Section 1: Introduction

London College of Contemporary Art's Prevent Duty Policy has been informed by both the Office for Student's guidance and the Governments Prevent Duty Guidance for Higher Education Institutions in England and Wales. This policy sits within the College's Safeguarding framework, and this policy should therefore be read in conjunction with the Safeguarding Policy. This policy describes the College's contribution to the multi-agency Prevent agenda and defines the College's process for referral.

The College is committed both to protecting freedom of speech and academic freedom and to preventing people from being drawn into terrorism.

Prevent is one part of the Government's strategy to target the threat of terrorism and extremism.

Channel is a multidisciplinary programme which focuses on providing support at an early stage to people who are identified as being vulnerable to being drawn into terrorism.

The College promotes adults and young people in making positive choices about their lives and endorses the Channel early intervention scheme for students who could be at risk of radicalisation. The guidance can be found here:

<https://www.gov.uk/government/publications/channel-and-prevent-multi-agency-panel-pmap-guidance>

This policy outlines the College's commitment to preventing people from being drawn into terrorism. In doing so we recognise that terrorism can be associated with a range of ideologies. A definition of terrorism is provided in Section 2 below.

This policy is written with reference to the Counterterrorism and Security Act 2015, the Equality Act 2010, the Human Rights Act 1998, the Data Protection Act 2018, and the Freedom of Information Act 2000. The Counterterrorism and Security Act 2015 places a duty on Colleges and Universities to have 'due regard to the need to prevent people from being drawn into terrorism.' The Act also notes that Colleges and Universities must seek to balance this duty with their commitment to freedom of speech and the importance of academic freedom.

The College has taken a risk-based approach in discharging its duties under the Counterterrorism and Security Act 2015.

Section 2: Definitions

- People are defined as staff, students, and visitors for the purposes of this policy:
- A student is defined as anyone who has accepted a place at the College, is currently studying at the College or who has completed their period of study but has outstanding assessments.
- A member of staff is defined as anyone who has accepted an offer of employment, or who is currently employed.
- Visitors are taken to mean temporary members of staff, contractors, individuals working in a voluntary capacity with staff or students and anyone involved in an activity taking place on College premises in their own right or on behalf of an organisation that has been given permission to use College premises.
- Terrorism is defined as the use or threatened use of violence for the purpose of advancing a political, religious, racial or ideological cause.
- Provost (or equivalent) means the person with primary responsibility for the management of a campus, or his/her nominee; or for students enrolled onto an online programme of study, the director or other person with overall responsibility for the delivery of the programme concerned, or his/her nominee.

Section 3: Responsibility for this Policy

Ultimate responsibility for the development of clear and effective processes and procedures associated with the maintenance of standards and quality assurance of academic provision and overseeing their application lies with the College's Executive Board.

Section 4: Principles

The College is committed to:

- fostering an inclusive environment in which the principles of academic freedom and of freedom of speech underpin our educational institution.
- ensuring individuals are safeguarded from being drawn into terrorism.

The College will seek to identify, protect and support individuals who it believes may be at risk of being drawn into terrorism.

The College discharges this responsibility in partnership with other agencies, including the Police, Local Authorities and the network of regional Prevent Coordinators.

Section 5: Institutional Duties

The College operates a risk-based approach and based on its risk assessment identifies any actions which need to be taken to mitigate these risks and develops an appropriate action plan.

The College ensures that relevant staff members are provided with appropriate training as outlined in the Prevent Duty Guidance and makes staff, students and visitors aware of the importance of referring concerns under the referral process contained in Appendix A.

The duties of the College's 'Prevent Lead' include:

- attending external meetings to update on the Prevent agenda.
- ensuring relevant updates on the Prevent agenda and on threat levels are communicated to the appropriate College staff.
- ensuring relevant staff are provided with appropriate training.

- ensuring the College's Executive Team are fully apprised of the most current Prevent developments.
- ensuring that relevant policies are compliant with the Prevent Duty Guidance and that any amendments to policy are put forward for consideration following a period of consultation within the College.

The Prevent Lead works closely with the College's Student Council to ensure that the policies the College develops in this area are supported, where appropriate, by the Student Council.

The College provides prayer/quiet reflection space for students and liaises with local faith groups.

Section 6: Information Sharing

In reaching a decision to share any information with third parties in implementing this policy the College will adhere to its Privacy Policy and the Data Protection principles contained therein.

In following the referral process outlined in Appendix A there may be instances where the College is sufficiently concerned by a person's behaviour and the risk they potentially pose that it will need to share these concerns with external agencies.

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 Data Retention Policy.

Section 7: Responsibility for the provision and its monitoring and evaluation

Responsibility for the review and oversight of this policy and associated protocols, and for the evaluation of their effectiveness, lies with the Prevent Lead and Safeguarding Officer.

Formal responsibility for monitoring and evaluation of this provision lies with the Academic Board.

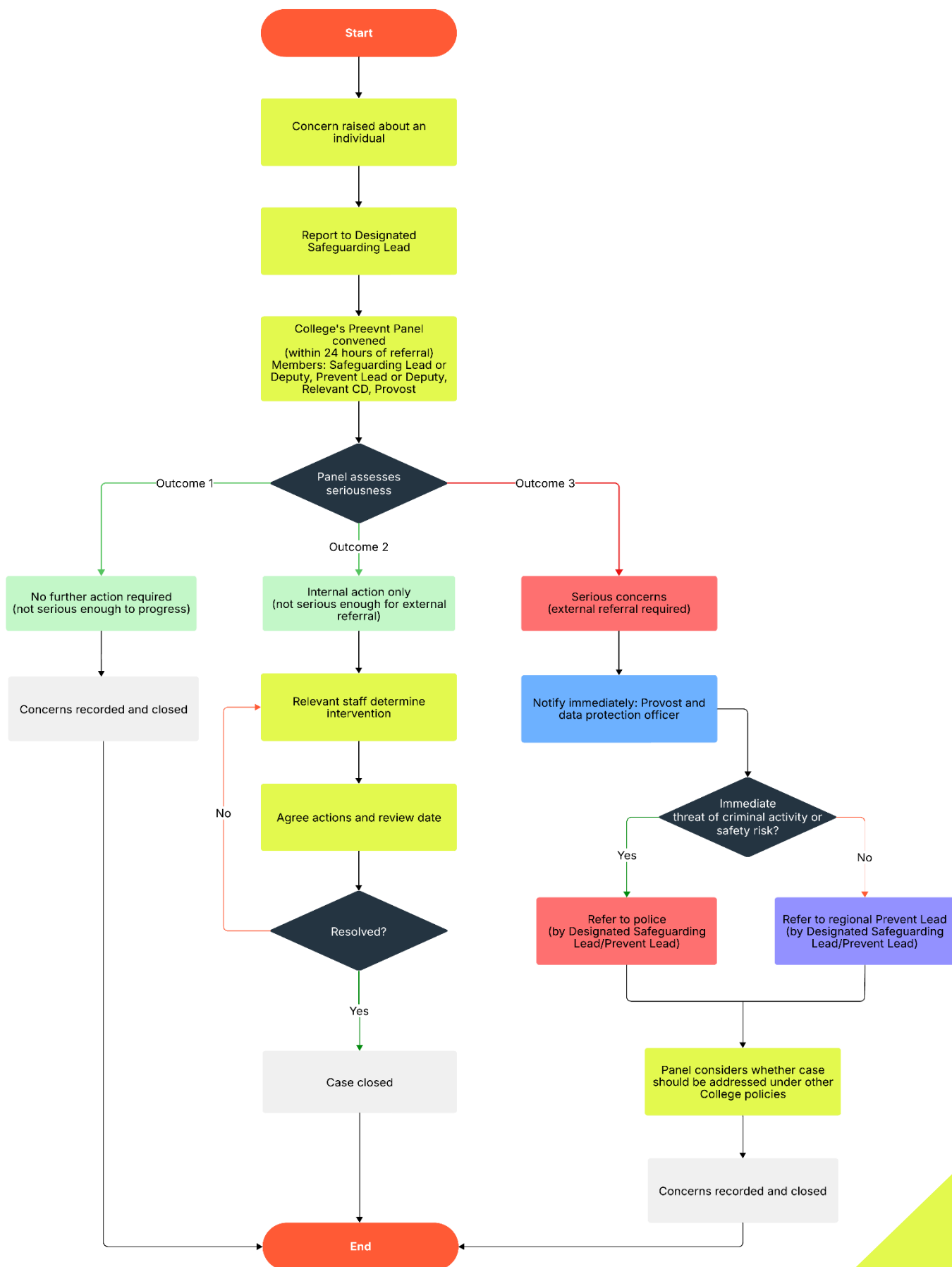
This policy and the effectiveness of these procedures will be reviewed on regular basis and updated if necessary.

Appendix A: Referral Process

1. Any person may identify concerns about an individual potentially being drawn into violent extremism based on information received or behaviour observed.
 - 1.1. Such concerns must be shared in a safe and supportive environment to enable investigation and appropriate intervention where required.
 - 1.2. Referrals will be investigated thoroughly and fairly without assumptions. The College approaches such concerns from a safeguarding perspective, prioritising the individual's welfare.
2. Only where there is clear and compelling evidence of a requirement to do so will information be shared with other agencies.
3. Where a person has concerns that an individual is expressing violent extremist views or is at risk of being drawn into violent extremism, these concerns should be passed to the Safeguarding Officer via the Prevent Lead.
4. Where concerns involve staff, the Safeguarding Officer will inform the Provost (or equivalent) and HR Business Partner, investigate with relevant HR support, and report findings to the Provost (or equivalent).
5. Upon receipt of a referral the Safeguarding Officer will convene the College Prevent Panel (within 24 hours) which will consist of:
 - Safeguarding Officer or Deputy
 - Prevent Lead or Deputy
 - Relevant Course Director
 - Provost (or equivalent)
6. The College Prevent Panel will decide as to the seriousness of the case. Three potential outcomes are likely at this stage:
 - i. No further action under the protocol is required
 - ii. There is substance to the case, but concerns are not serious, requiring internal action only. Relevant staff will determine the intervention, agree actions and review date, then reassess the case and take appropriate action.

- iii. The panel considers that the concerns are serious and referral to an external agency is appropriate.
-
- 7. Where a decision to refer has been taken under 6.3 if there is evidence to suggest that there is an immediate threat of criminal activity, or to the safety of the individual or others, the matter will be referred to the Police. In all other cases the matter will be referred to the Prevent Lead for the region by the Safeguarding Officer. The Provost (or equivalent) and Data Protection Officer will be notified of the Panel's decision immediately.
 - 8. The College Prevent Panel will also consider whether the case should be considered under any other College Policy irrespective of the decision under paragraph 7. Where a referral is made to an external agency under paragraph 6.3 proceedings under other College Policies may be stayed pending the outcome of the referral.
 - 9. A record of the panel's decision will be kept by the Safeguarding Officer.
 - 10. A flowchart for the process of reporting concerns is included in Appendix B and a referral form is included in Appendix C.

Appendix B: Prevent Procedure



Key Information	
Version	1.2
Approved By	Senior Management Team
Author(s)	Head of Student Experience
Owner	Head of Student Experience
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Version Control			
Version	Author	Date	Summary of Changes
V 1.0	Head of Student Experience	01-08-2023	First version published
V 1.1	QA Manager	14-12-2025	Whole document formatting (updated Key Information table format, subheadings, contents field)
V 1.2	QA Manager	30-09-2025	Replaced Appendix C form with National Prevent Duty form; replaced with improved process map Appendix B; formatting whole document (new brand assets)

National Prevent referral form

This form is designed to help articulate a concern under Prevent – where you are worried a person is susceptible to radicalisation. Complete as much of the form as you are able; doing so will ensure that the person gets the help they need to keep them and others safe.

If you are a member of public sector staff, and would like to check your concern, you should contact your organisation's Designated Safeguarding Lead (DSL) or equivalent. If you are a member of the public and are concerned about someone, you should call the Act Early Support Line on 0800 011 3764, in confidence to share your concerns with a specially trained officer or you can call the Anti-Terrorism Hotline on 0800 789 321. More information on what to do if you have a concern is available under 'Get help for radicalisation concerns' on GOV.UK.

If you are deaf, hard of hearing or have a speech impairment, a police non-emergency number is available as a text phone service on 18001 101. Remember, in an emergency dial 999.

Once you have completed this form it is essential that you submit it to the police directly, or your DSL or equivalent will do this on your behalf. Where possible you will receive a response on your referral, but this is not always possible due to data-protection considerations and other sensitivities.

Where possible, do not leave any gaps, as the police may have to contact you to gather more information which will delay the process. If you cannot answer a question, explain why in the text box provided.

1 Details of person being referred

Complete where information is known and applicable.

This information will not be used to assess whether a referral should be adopted. Any personal data provided may support Equality Act obligations. Please only provide personal data if this information is already known from an official source or was provided by the person in question.

Surname

First name(s)

Date of birth
or approximate age

Gender

Ethnicity

Nationality

Immigration or asylum status

First language

Religion

Current address

Phone number

Email address

Social media identifiers
for example, usernames
and platforms

Parent or guardian contact details

Any other details that may be relevant to the concern

2

Describe your concerns relevant to Prevent

How/why did the person first come to your notice?

What is the person's ideology or belief of concern if known? For example, extreme right-wing terrorism (ERWT), Islamist terrorism, left wing, anarchist and single-issue terrorism (LASIT)

What specific concerns do you have? Such as, have they had contact with extremist groups or people that worry you, discussed travel plans to a conflict zone, threatened anyone with violence, shown interest in hate crimes, extremists, or terrorism, or used their mobile phone, internet or social media in a way that worries you.

Describe any other concerns you may have.

3 Relevant or concerning behaviours you have noticed

Select the concerning behaviours you have noticed (if applicable).

Absenteeism	Abusive behaviour
Anti-social behaviour	Becoming socially isolated
Change in appearance	Closed to challenge
Confrontational	Concerning use of the internet
Expression of extremist views	Fixated on a topic or group
Interest in conspiracy narratives	Interest in extremist groups/causes
Interest in weapons	Legitimising use of violence
Quick to anger/use of violence	Seeking to recruit
Self-harm	Substance misuse
Sudden abandonment of interests	Support for gender-based violence
'Them and us' language	Use of inflammatory language
Use of symbolism linked to extremism	Other

Provide more detail on all the behaviours selected above or describe a behaviour not listed. If you require further space, attach additional sheets to the form.

4

Additional factors

Select any which apply to the person if applicable.

Access to weapons	Adolescence or period of transition
Adverse childhood experiences	Disability
Domestic abuse	Extremist material
Family breakdown	Family dispute
Financial problems	Gang or group membership
History of violence	Homelessness
Illness	Learning disability
Links to criminality	Loss or bereavement
Mental health	Neurodiversity
Physical/emotional abuse	Sexual abuse
So called honour-based violence	Socially excluded
Thoughts of suicide/self-harm	Trauma from conflict
Unemployment	Victim of abuse
Victim of crime	Victim of hate crime
Other	

Provide more detail on all the factors selected above or describe a factor not listed. If you are not sure which behaviour categories are relevant, provide any details you can. If you require further space, attach additional sheets to the form.

5

Your details

Surname

First name(s)

Organisation

Address of organisation

Role or job title

Phone number

Email address

Relationship to the person

6

Details of the person who first identified the concern (if different from above)

Surname

First name(s)

Organisation

Role or job title

Phone number

Email address

Relationship to the person

7

Details of the person you have shared the concern with

Provide the details of the person you have shared the concern with if known for example, your Designated Safeguarding Lead or equivalent, or Prevent police

Surname

First name(s)

Organisation

Role or job title

Relationship to the person

Phone number

Email address

8

Relevant dates

Date concern was first identified

Date of referral to Prevent

9 Safeguarding considerations

Does the person have any stated or diagnosed disabilities, neurodiversity needs, or mental health issues?

Yes

No

If yes, provide further details of the diagnosis.

Have you discussed this person with your organisation's Designated Safeguarding Lead or equivalent (if applicable)?

Yes

No

What was the result of this discussion?

Does the person know you are sharing this concern?

Yes

No

If yes, describe the response

Have you taken any direct action with the person since this concern was identified?

Yes

No

If yes, describe the action and result

10

Employment/education details of the person of concern

Current occupation and employer:

Previous occupation(s) and employer(s):

Current school/college/university:

Previous school/college/university:

Not currently in education or employed:

11 If there is anything you have not been able to add to the form, but feel is relevant, please provide details or a contact number below

Thank you for taking the time to make this referral.

You should now submit this form to

or your Designated Safeguarding Lead or equivalent will do this for you.

Information you provide is valuable and will always be assessed. If there is no Prevent concern but other safeguarding issues are present, this information will be sent out to the relevant team or agency to provide the correct support for the person concerned.

The Home Office and Counter-Terrorism Policing regularly conduct research in order to continuously improve the delivery of Prevent, and may contact you to invite you to participate in such research.

Tick this box if you **do not** wish to be contacted for research-related purposes.