# Prevent Duty Policy

The University of Law

LCCA London College of Contemporary Arts

## Introduction

1. The Counter Terrorism and Security Act 2015 places a duty on all universities as relevant higher education bodies (RHEB) to have due regard to the need to prevent people from being drawn into terrorism. The University of Law's Prevent Policy has been informed by the Government's Prevent Duty Guidance for Higher Education Institutions in England and Wales. The purpose of this policy is to describe the University's contribution to the multi-agency Prevent agenda and defines the University's process for referral.

2. The University of Law including any subsidiaries (the University) is committed to:

   - the safety and wellbeing of all members of the University community including the need to safeguard individuals from being drawn into terrorism. This policy should be read in conjunction with the University's Students of Concern Policy. which sets out how the University promotes the safety and wellbeing of all students, to sustain an environment where all can engage in a community of learning. The University has also developed a Students Under 18 Years of Age Policy and a Safeguarding Children and Adults at Risk Policy;
   - protecting academic freedom and freedom of speech, and has developed a Code of Practice on Freedom of Speech;
   - equal opportunity for all its students irrespective of age, disability, gender reassignment, marriage and civil partnership, pregnancy and maternity, race, religion or belief, nationality, sex or sexual orientation, and has developed an Equality, Diversity and Inclusion Policy creating a cohesive and harmonious environment for the benefit of all members of the University community; and
   - taking a risk-based approach in discharging its duties under the Counter Terrorism and Security Act 2015.

## Scope of this Policy

3. This policy applies to all staff, students and visitors to the University and applies to all University activities undertaken in the UK. The Prevent Duty does not apply outside of the UK.

## Definitions

4. **People** are defined as staff, students and visitors. For the purposes of this policy:

   4.1. **a student** is defined as anyone who has unconditionally accepted a place at the University, is currently studying at the University or who has completed their period of study but has outstanding assessments.

   4.2. **a member of staff** is defined as anyone who has accepted an offer of employment, or who is currently employed.

   4.3. **visitors** is 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 University premises in their own right or on behalf of an organisation that has been given permission to use University premises.

5. **Terrorism** is defined as the use or threatened use of violence for the purpose of advancing a political, religious, racial, or ideological cause. Terrorism may take the form of extremist behaviour and acts.

6. **Extremism** is the promotion or advancement of an ideology based on violence, hatred or intolerance, that aims to:

   6.1. Negate or destroy the fundamental rights and freedoms of others; or

   6.2. undermine, overturn or replace the UK's system of liberal parliamentary democracy and democratic rights; or

   6.3. intentionally create a permissive environment for others to achieve the results in 6.1 or 6.2..

7. **Radicalisation** is the process of a person legitimizing support for, or use of, terrorist violence.

8. **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.

9. **Campus Director** means the person with primary responsibility for the management of a campus, or their nominee.

## Responsibility for this Policy

10. 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 University's Academic Board.

## Principles

11. The University will foster an inclusive environment in which the principles of academic freedom and freedom of speech are upheld whilst ensuring that individuals are safeguarded from being radicalised and drawn into terrorism.

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

13. The University will discharge this responsibility in partnership with other agencies, including the Police, Local Authorities, and the network of regional Prevent Coordinators.

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

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

16. The University's 'Prevent Lead' is the Designated Safeguarding Lead (DSL) whose duties in respect Prevent include:

16.1 Attending external meetings to update on the Prevent agenda;

16.2 Ensuring relevant updates on the Prevent agenda and on threat levels are communicated to the appropriate University staff;

16.3 Ensuring staff are provided with appropriate training;

16.4 Ensuring the University's Board and Executive Board are fully apprised of compliance with the Prevent Duty; and

16.5 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 University.

17. The Prevent Lead works closely with the University of Law's Students' Union to ensure that the policies the University develops in this area are supported, where appropriate, by the Students' Union.

18. The University provides prayer/quiet reflection space for students and liaises with local faith groups to provide sufficient chaplaincy support for students.

## Information Sharing

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

20. In following the referral process outlined in Appendix A there may be instances where the University 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.

21. In sharing such information with external parties, the University will share only sufficient and relevant information in order to allow the concern to be appropriately followed up.

22. The University will keep confidential records of the information shared. These will be kept in accordance with the Data Retention Policy.

## Responsibility for the provision

23. Responsibility for the review and oversight of this policy lies with the Designated Safeguarding Lead.

## Monitoring and evaluation of the provision

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

## Version history

| Version | Amended by | Revision summary | Date |
|---|---|---|---|
| V1.0 | Director Operational Services (Designated Safeguarding Lead/DSL) | Initial draft | 25.10.2016 |
| V1.1 | Director Operational Services (DSL) | Updated | 12.05.2017 |
| V1.2 | Director Operational Services (DSL) | Updated | 28.09.2018 |
| V1.3 | Director of Student Experience, Wellbeing and Inclusion (DSL) | Updated | |
| V1.4 | Director of Student Experience, Wellbeing and Inclusion (DSL) | Review | October 2021 |
| V1.5 | Director of Student Experience, Wellbeing and Inclusion (DSL) | Review | January 2024 |
| V1.5 | Approved by Academic Board | | 8 February 2024 |
| V1.6 | Director of Student Support and Wellbeing | Minor amendments following role changes | 08/08/2025 |
| V1.7 | Head of Safeguarding | Amendments to update policy titles and process changes | 06/11/2025 |
| V1.8 | Head of Safe and Inclusive Campuses | Review and amendment to definition of extremism | 05/06/2026 |
| V1.8a | Director Quality Assurance & Academic Standards | Definition of The University amended to include subsidiaries | 30/10/2026 |

## 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. 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. Referrals can be made to the DSL or via the SSWB referral form

    1.2. It is equally important that assumptions are not made on the basis of information received and that referrals are investigated thoroughly and fairly. The University will seek to approach such concerns from the perspective of safeguarding the individual about whom concerns have been expressed.

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 radicalised, these concerns should be passed to the Designated Safeguarding Lead (DSL) or a campus Safeguarding Officer (SO). Where the concerns relate to a member of staff, the appropriate People Business Partner must also be informed.

4. Where the DSL considers that the matter should be escalated, they will convene the University Prevent Panel.

5. The University Prevent Panel which will consist of:

    5.1. DSL

    5.2. Director of Legal Services

    5.3 The Campus Director (or a Senior Academic if the student studies online)

6. The University Prevent Panel will make a decision as to the seriousness of the case. Three potential outcomes are likely at this stage:

    6.1. No further action is required.

    6.2. There is substance to the case but at this stage the concerns are not deemed to be serious and internal action only is required. The exact nature of the intervention required would be determined by discussion between relevant staff members. Actions and a review date will be agreed. At the review the case would be assessed again and the appropriate actions taken.

    6.3. 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 Local Authority Prevent Lead by the DSL. The Vice-Chancellor and Chief Executive Officer and Data Protection Officer will be notified of the Panel's decision immediately.

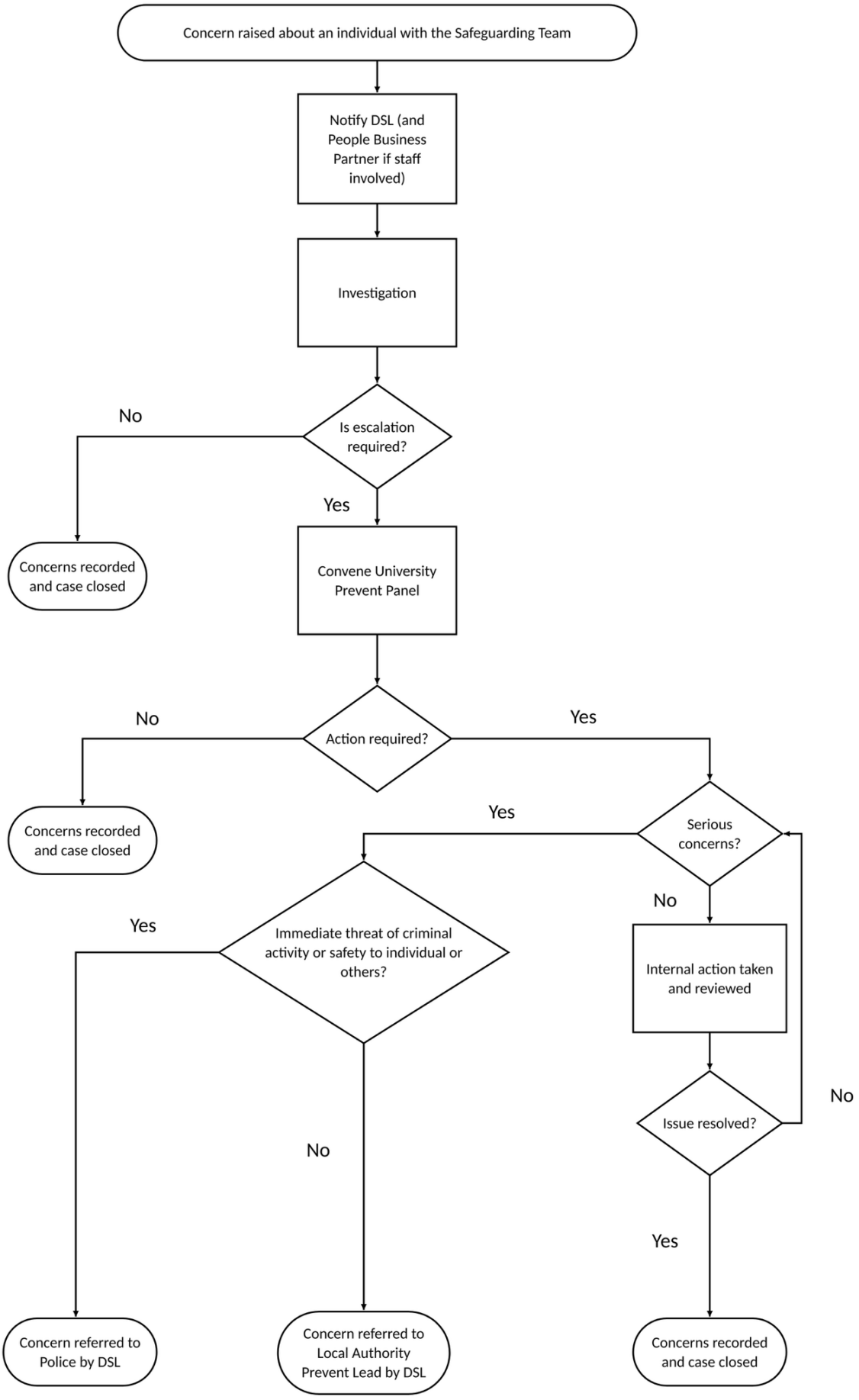
8. The University Prevent Panel will also consider whether the case should be considered under any other University Policy irrespective of the decision under paragraph 6. Where a referral is made to an external agency under paragraph 6.3 proceedings under other

University Policies may be stayed pending the outcome of the referral.

9. A record of the panel's decision will be kept by the DSL within the casework management system.

10. A flowchart for the process of reporting concerns is included in Appendix B.

## Appendix B


Concern raised about an individual with the Safeguarding Team
Notify DSL (and People Business Partner if staff involved)
Investigation
Is escalation required?
No
Concerns recorded and case closed
Yes
Convene University Prevent Panel
Action required?
No
Concerns recorded and case closed
Yes
Serious concerns?
Yes
Immediate threat of criminal activity or safety to individual or others?
Yes
Concern referred to Police by DSL
No
Concern referred to Local Authority Prevent Lead by DSL
No
Internal action taken and reviewed
Issue resolved?
No
Yes
Concerns recorded and case closed