

The Place Prevent Policy

Introduction and Context

London Contemporary Dance School is part of The Place (Contemporary Dance Trust) on which the Prevent duty falls. Under Section 21 of the Counterterrorism and Security Act 2015 London Contemporary Dance School is under a duty to 'have due regard to the need to prevent people from being drawn into terrorism'.

London Contemporary Dance School ensures it remains a safe, nurturing and inclusive environment for teaching, learning and research and aims to meet its obligations under the Prevent Duty to ensure that vulnerable individuals within the LCDS community are safeguarded from being drawn into terrorism.

London Contemporary Dance School understands its Prevent Duty of ensuring that the risks of staff and students being radicalised are minimised, whilst at the same time balancing its other legal duties, including freedom of speech and academic freedom within the law and promoting equality, diversity and inclusion across LCDS.

This policy provides a framework to inform our response to safeguarding concerns for those who may be vulnerable to the messages of extremism.

Scope of this Policy

This policy applies to all staff and students at London Contemporary Dance School and The Place, which includes permanent staff, hourly paid staff and freelancers. It explains the responsibilities around the Prevent Duty, what you should do if you think someone is at risk of being drawn into terrorism and who to contact if you are worried or unsure about anything. It ensures that policies and procedures relating to vulnerable staff take appropriate account of the Prevent duty

It provides details of the local inter-agency process and expectations in identifying appropriate interventions based on the threshold of need and intervention model and the Channel process.

Approach

London Contemporary Dance School is committed to fostering an inclusive environment in which the principles of academic freedom and of freedom of speech underpin the educational provision. London Contemporary Dance School 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 LCDS community.
- No referral of any student will be made to the authorities and/or the Channel Programme, without the express permission of Chief Executive, following advice from the Director of Dance Studies

Prevent Compliance

LCDS ensures the implementation of the Equality Duty is balanced with its responsibilities to protect student and staff welfare under the Prevent duty.

Prevent work will be closely aligned with the existing [Safeguarding Policy](#) and ensures it abides by any locally agreed inter-agency procedures relating to safeguarding

LCDS shall determine the applicability of this policy to any partnership activities and can apply this policy in whole or in part in order to ensure that the Prevent duty is discharged.

The Board of Governors has overall responsibility for ensuring that LCDS discharges its Prevent duty, ensuring that policies, procedures and external networks, are in place. The Board of Governors shall submit an annual monitoring report to OfS.

The Director of Dance Studies as the Prevent Single Point of Contact (SPOC) has management oversight for the implementation of the Prevent duty within LCDS and designated responsibility alongside the Chief Executive for Channel referrals / liaison. The Director of Dance Studies shall determine arrangements for cover if they are unavailable.

Information Sharing

Information sharing will only take place with external authorities when this is consistent with the provisions of the Data Protection Act.

The Prevent SPOC can seek advice regarding a Prevent-related concern from within LCDS/The Place, or from sources external to LCDS/The Place before determining whether further action should be taken in relation to a concern.

Communications

The Place will not permit material supporting terrorism to be displayed within its premises and will remove any such material. The Place ensures that printed and electronic communications (including its website) does 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 the [Freedom of Speech Policy](#).

Prevent risk assessment and outside speakers

Where necessary and in line with its [Freedom of Speech Policy](#), LCDS will exclude those promoting extremist views that support or are conducive to terrorism.

Further details of the policies and procedures relating to the use of premises by external groups and speakers is set out in the Freedom of Speech Policy.

Online safety and access to extremist or terrorism-related materials

In order to discharge the Prevent duty, The Place ensures that appropriate systems are in place with regard to online and e-Safety. This includes filtering or other restrictions of access to online content on school IT systems and/or appropriate monitoring of the IT use of staff and/or students.

LCDS will implement policies consistent with the Prevent duty to manage instances where online or other extremist or terrorist-related materials may be accessed by staff or students for teaching, learning, research or other purposes which are relevant to the work of the school.

Referrals and Reporting

Following receipt of a referral, appropriate members of staff will carry out a review of the concerns raised; the review will 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 Director of Dance Studies.

If a concern is raised about a member of staff, the review will be led by the Head of Human Resources.

A decision will be made about the next stage based on the outcome of the review.

There are three likely outcomes:

1. No further action is required under this policy. In this case a confidential record of the case will be kept by the Director of Dance Studies or the Head of Human Resources (as appropriate).
2. 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.
3. 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:
 - ii. referral to the Regional Prevent Co-ordinator or to the Channel Programme.

A confidential record of all external referrals made under this policy will be kept. In reaching any decision about external referral, LCDS will have regard to its obligations under its Data Protection Policy.

Concerns will only be shared externally where there is clear and compelling evidence of a requirement to do so. A flowchart setting out the process for reporting concerns is set out at **Appendix 4**.

Referral of concerns regarding radicalisation

Any member of The Place (student or staff member) can identify concerns about a student or staff member potentially being drawn into violent extremism based on information received or behaviour observed. Concerns can be shared in a safe and supportive fashion to enable a thorough and fair investigation and an appropriate intervention to be developed, if required.

It is important to refer any concerns under this process. Individuals are not expected to determine whether there is a genuine risk or to challenge the individual about any concerns. Guidance is clear that there is no single way to identify who is likely to be vulnerable to being drawn into terrorism.

Concerns about a student at risk of radicalisation should be made as a Safeguarding referral where it is appropriate to do so under LCDS policy. The school Prevent SPOC should be notified about such concerns as a matter of urgency.

The Prevent SPOC will decide upon whether a referral to an external agency is appropriate, making a recommendation for final sign-off by the Chief Executive. Where appropriate and legal to do so, the Prevent SPOC will share information with other institutions and key partners, such as the local Prevent group.

To assist 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 in **Appendix 1** of this policy. **Appendix 2** lists some factors which might contribute to an individual becoming radicalised.

Reporting of Serious Incidents

Any potential Prevent-related serious incidents must be referred to the Prevent Single Point of Contact as soon as they occur or are identified, to allow for gathering any additional information. The Prevent SPOC, in consultation with the Chief Executive (as Accountable Officer), will determine whether there is a need to formally report a matter to the OfS as a serious incident.

The Channel Programme

Where a referral is made to Channel in relation to a student, express permission from the Chief Executive of The Place must be sought.

The Channel Programme is a multi-agency approach to protect people at risk from radicalisation and a key element of the Prevent strategy.

Further information about the Channel programme can be found here:

https://www.gov.uk/government/uploads/system/uploads/attachment_data/file/118194/channelguidance.pdf

Further information on external agencies and Policies can be found in **Appendix 3**.

Contact List Prevent Single Points of Contact



Chief Executive (Accountable Officer)

Director of Dance Studies (Students)

Head of Human Resources (Staff)

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.

Please see Appendix 1 for Prevent Single Point of Contact information

Appendix 2:

Factors which might contribute to an individual becoming radicalised

Below are some of the factors that might contribute towards an individual becoming radicalised. This is not an exhaustive list and the presence of any of these factors does not necessarily mean that they will be involved in extremist activity. However, a combination of many of these factors may increase the vulnerability to extremist activity.

Identity crisis

Distance from cultural/religious heritage and uncomfortable with their place in the society around them.

Personal crisis

Family tensions; sense of isolation; adolescence; low self-esteem; disassociating from existing friendship group and becoming involved with a new and different group of friends; searching for answers to questions about identity, faith and belonging.

Personal circumstances

Migration; local community tensions; events affecting country or region of origin; alienation from UK values; having a sense of grievance that is triggered by personal experience of racism or discrimination or aspects of Government policy.

Unmet aspirations

Perceptions of injustice; feeling of failure; rejection of civic life

Criminality

Experiences of imprisonment; poor resettlement/reintegration, previous involvement with criminal groups.

Appendix 3:

National Policy and Strategies

In response to this considerable challenge, the Government has developed a counterterrorism strategy, known as CONTEST. The aim of CONTEST (an abbreviation of COUNTER TERRORIST STRATEGY) is to reduce the risk to the UK and its interests overseas from international terrorism to that people can go about their lives freely and with confidence.

The CONTEST strategy has 4 key strands of work that have a different role to play in tackling the threat from extremism: Further information about the CONTEST strategy can be found here: <https://www.gov.uk/government/publications/counter-terrorism-strategy-contest-2018>

CONTEST COUNTER TERRORIST STRATEGY PREVENT to stop people becoming terrorists or supporting terrorism

PURSUE where an attack cannot be stopped, to mitigate its impact

PROTECT to strengthen the overall protection against terrorist attacks

PREPARE to stop terrorist attacks

The Prevent agenda is regarded as a challenging strand of the CONTEST strategy as all the work undertaken within this area of work sits within the non-criminal space, i.e. before any criminal activity has taken place.

Further information about Prevent-related serious incident reporting can be found here: <https://www.officeforstudents.org.uk/media/29154421-d3e7-4989-9e53-94413fd013f9/ofs-preventrelated-serious-incident-guidance.pdf>

Further information about Prevent framework for monitoring in HE can be found here: <https://www.officeforstudents.org.uk/publications/prevent-duty-framework-for-monitoring-in-highereducation-in-england-2018-19-onwards/>

Referrals

Referrals to the Channel process are coordinated by the police but come from a wide range of sources, including members of the public, social services, youth offending teams and health and education practitioners.

If anyone wants to know more about Channel or have a concern about an individual and 2 See below, Implementation want to raise a concern, they should contact the School's Prevent SPOC.

When a referral is received, a risk assessment of the individual being referred will be undertaken. If there is evidence of potential vulnerability to radicalisation then a multi-agency panel will meet to consider the risks identified and develop a programme of support and intervention to mitigate those risks. Consent is required from the individual being referred to share their personal information with the panel.

Appendix 4:

Referral Flow chart

