



Royal College of Art

Postgraduate Art & Design

Prevent Policy Statement

Introduction

1. The Counter Terrorism and Security Act 2015 places a duty on all relevant higher education bodies (RHEB's) to "have due regard to the need to prevent people from being drawn into terrorism". This is commonly referred to as Prevent, or the Prevent Duty, and also applies to further education colleges, schools, local authorities, the NHS and certain other public bodies. Prevent is one strand of the government's counter-terrorism strategy.

2. The Office for Students (OfS) is responsible for monitoring RHEB's compliance with Prevent, and institutions need to meet statutory reporting requirements to OfS.

College approach to Prevent

3. The College is committed to ensuring that it remains a safe, nurturing, inclusive and creative environment for teaching, learning and research. We will seek to ensure that appropriate, proportionate and effective measures are in place to meet our obligations under the Prevent duty, whilst maintaining the College's commitment to academic freedom and freedom of speech.

4. The College will take a risk-based approach to discharging its Prevent responsibilities. This means that the College's starting point will be an assessment of risk, followed by actions only where a risk of individuals being drawn into terrorism has been identified.

4. The College has a duty of care to our students and staff. This includes having policies and processes in place to safeguard and support vulnerable individuals, including anyone who may be at risk of being drawn into terrorism.

Definitions

5. Terrorism is defined as an action or threat designed to influence the government or intimidate the public, with a view to advancing a political, religious or ideological cause. A terrorist action is defined as a violent action that:

- Endangers a person's life, other than that of the person committing the action;
- Involves serious violence against a person;
- Causes serious damage to property;
- Creates a serious risk to the public's health and safety;
- Interferes with or seriously disrupts an electronic system.

6. Extremism is defined as the vocal or active opposition to fundamental values of democracy, the rule of law, individual liberty, respect and tolerance for different faiths and beliefs. Calls for the death of members of armed forces are also considered as extremist.

7. Radicalisation is defined as the process by which a person comes to support terrorism and extremist ideologies associated with terrorist groups

Leadership

8. The College's compliance with the Prevent Duty is reviewed on an annual basis by the Audit & Risk Committee. The annual review will include a review of the Prevent risk register and associated action plan, and confirmation of the annual Prevent statutory return to the OfS. The Audit & Risk Committee will report annually to the Council, with a view to reassuring the Council that the College's responsibilities under the Prevent Duty are being effectively discharged

9. The Registrar is the Prevent lead for the College and is responsible for ensuring that the College complies appropriately with the Prevent Duty, in accordance with guidance issued by HEFCE, Universities UK, the regional Prevent coordinator or others. This includes:

- Ensuring that all school and professional service senior leadership teams are reminded on a regular basis of the need to pay regard to the Prevent Duty;
- Ensuring that relevant staff have access to training to enable them to understand the risks related to the Prevent Duty, and understand how to respond appropriately when necessary;
- Ensuring that key staff have more detailed training to give support to vulnerable students and staff, and on referral mechanisms in appropriate circumstances.

Partnerships

10. The College will seek guidance from the Prevent Officer for London on this Policy and its approach to the Prevent Duty. The Registrar shall be a member of the London HE Prevent Network.

11. Other sources of support and partnership include the police and the London Boroughs of Hammersmith & Fulham, Kensington & Chelsea and Wandsworth. The College shall form partnerships with these bodies on an as-needed basis.

Capabilities and Training

12. All members of staff should be aware of the College's responsibilities under the Prevent Duty. Members of the College community who are concerned about a student or member of staff should immediately contact the Head of Student Support or Registrar for a confidential discussion.

13. All staff with regular contact with students shall receive guidance on how to respond in situations where students may be being drawn into terrorism. This guidance shall normally be focussed on referring on to suitably trained staff in order for them to respond, rather than by direct intervention with the vulnerable student. The Student Support team shall include staff with more detailed Prevent training, which will enable them to provide support and guidance as necessary and also to identify when referral to other bodies such as the police is appropriate.

14. College Security Personnel shall receive specific awareness training, as approved by the Association of University Chief Security Officers.

Scope

15. The Prevent Policy applies to all staff and students of the College.

Risk Assessment and Action Plan

16. As required by the Prevent Duty, the College has carried out an assessment of the risk of its students and staff being drawn into terrorism and agreed an action plan to ensure we manage the risk appropriately. The key areas of policy and practice affected are:

- Events bookings and space management;
- External speakers, where the College has adopted a Code of Practice on Freedom of Speech;
- Staff training;
- Pastoral care and support for staff and student well-being;
- Acceptable use of the College's IT facilities

17. The risk assessment shall be considered annually, with reference to:

- Student and staff welfare (including equality and diversity, safety and welfare);

- Management of the estate;
- Relationships with partners.

18. The College does not have its own faith facilities, but staff and students are able to access the Chaplaincy Multi-Faith Centre at Imperial College London. Staff or students using the Chaplaincy or related facilities are expected to comply with the relevant Imperial College policies.

19. The risk assessment will be reviewed annually by the Senior Management Team and by the Audit & Risk Committee. Where significant risks are identified, the College will consider the actions required to mitigate their impact and likelihood, and these actions will be included in the College's Prevent action plan.

IT Services

20. The College publishes an "Acceptable Use Policy" (referring to acceptable use of the College's IT infrastructure), which shall refer to the Prevent Duty. To support learning and research, the RCA does not enforce web filters to restrict access to internet content. However, using College services in a way that encourages or promotes terrorism is considered wholly unacceptable and in such cases will be investigated and appropriate action taken, including notifying enforcement agencies where applicable. The annual risk assessment will consider IT misuse according to the Prevent Duty and possible restrictions but will remain mindful of the likely risk to student and staff academic freedoms.

21. Where individuals are working in sensitive or extremism-related research, then they will be referred to the Registrar for guidance on any steps to be taken to ensure that the College's obligations under the Prevent Duty are discharged.

Information Sharing

22. The College recognises its obligation to comply with the provisions of the Data Protection Act and its Common Law duty of confidentiality in discharging its Prevent Duty responsibilities. Information regarding students or staff activity may only be shared when due regard is given to the following:

- The necessity and proportionality of sharing information between the giver and recipient of the information;
- The need to obtain consent wherever possible from the data subject;
- The College's legal power to share the information with the recipients

23. The College will only share information without consent with external agencies where there is a reasonable belief that to do so is necessary to prevent criminal activity from taking place.

Student and Staff Welfare

24. The College's Student Support team shall be responsible for considering appropriate welfare arrangements for any vulnerable students who are referred to that team, while the College's Human Resources team shall be responsible for considering appropriate arrangements for vulnerable staff. These may include referral to internal or external counsellors or health professionals, as well as, for students, other steps outlined in the College's "Causes for Concern" policy.

Events on Campus and Use of College Premises

25. The College does not normally invite external speakers (other than those invited wholly for the purposes of teaching on College programmes) or permit events not managed by the College to take place on College premises. Any such invitation may only be made on approval from the Director of Estates and Campus Operations, following a risk assessment which will include an assessment of the risk of participants being drawn into terrorist activities.

26. The College offers public exhibitions of student work, which are managed by staff of the College. Student work which may be considered to contain a risk of encouraging others to be drawn into terrorism shall be referred to the College's Ethics Committee, which may conduct a risk assessment and, where appropriate, require amendments or withdraw any such work from the exhibition.

Trevor Pearce
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