ART ACADEMY LONDON

PREVENT Policy & Procedure

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Appendix A: Incident Report Form

Contacts

Staff	Role	Email	Phone
Darren Nairn	Prevent Coordinator	darren@artacademy.org.uk	02074076969
Astrid Gorissen	Deputy Prevent Coordinator	astrid@artacademy.org.uk	02074076969

In the event of the Prevent Coordinator's absence, the Operations Manager shall deputise as Deputy Prevent Coordinator.

The Prevent Coordinator is contactable during normal office hours (9.00 -17.00) by email, in person or by phone. The Prevent Coordinator can be contacted in an emergency outside of these times (i.e extended independent studio times as published in the student handbook) via the evening receptionist on 02074076969.

1. Introduction and context

Art Academy London has a statutory duty to fully comply with (and report on) Section 26 of the Counter Terrorism and Security Act 2015, termed "PREVENT". It acknowledges the responsibilities assigned by the legislation and has devised this policy to address these responsibilities. The purpose of this duty is to aid the process of preventing people from coming to harm by being drawn into terrorism and it is embedded within a number of the Academy's policies as part of our wider duty of care to both students and staff.

This policy's implementation will not interfere with our duties to protect artistic and academic freedom and promote freedom of speech within the law for staff, students and visitors.

2. Scope

The Prevent Policy applies to all staff and (where relevant) students of the Academy:

- All persons (whether academic staff or otherwise) whose normal place of work is on premises of Art Academy London.
- All registered students at the Academy (whether full-time or part-time)
- Any other student association/ body, and any of its constituent societies, clubs and associations.
- All bodies or persons not associated with the Academy who hire or otherwise use the Academy's facilities.

This Policy applies for the following meetings and events:

- Meetings and events within the Academy which are arranged by staff or students but outside normal academic activity and which involve an external speaker not associated with the Academy

- Meetings and events within the Academy or other uses of Academy facilities which are arranged by persons not associated with the Academy, whether by hire or any other arrangement.
- Meetings and events arranged by student unions or other bodies/ associations, which involve an external speaker not associated with the Academy or said student association.

This Policy does not normally apply to activities directly linked with the academic work of the Academy, committee meetings, sporting, social or cultural events. However it may it be invoked if the Academy becomes aware that an event is likely to lead to a contravention of our Prevent Duty.

All kinds of extremism are within the scope of this Policy, including (but not limited to) religious, ideological, political, animal welfare and environmental extremism. Views of extremism that are inaccurate, overly-simplistic, stereotypical, or are themselves divisive should be challenged.

3. Responsibilities

The Prevent agenda is managed at Art Academy London by the Director of Academic Quality, Standards and Student Experience who is the single named person titled 'Prevent Coordinator' and is responsible for liaising with the relevant external parties. The Principal, on behalf of the Board of Trustees has overall responsibility which is put into effect by the Director of Academic Quality, Standards and Student Experience. In the absence of the Director of Academic Quality, Standards and Student Experience, the Operations Manager shall deputise.

All members of staff should be aware of the Academy's policy regarding the Prevent Duty and of the measures set out to address the responsibilities it addresses. Members of the Academy's community who are concerned about a student who might be at risk of being drawn into terrorism should report this to the Prevent Coordinator. The Prevent Coordinator must also be notified if there is a concern regarding an event, speaker or visiting tutor/ artist.

3.1 Training

Training and briefing for all will include an explanation of how to handle appropriately and sensitively any concern that may emerge. For those with whom any specific concerns may be raised, differentiating the risk of radicalisation from other issues will be covered in more detail, together with the opportunities and requirement to share information confidentially where needed. Our approach will be to support vulnerable students in whatever circumstance they find themselves, recognising that radicalisation could occasionally be occurring when certain behaviour is manifest but that other explanations will usually apply.

3.1.1 Staff and volunteers

All new permanent, fixed term and temporary staff (irrespective of duties) are given an induction by the Operations Manager within which a copy of the Prevent Policy is issued and special attention drawn to the Academy Prevent reporting procedures. Staff will previously been alerted to the policy through the staff handbook and they are kept informed of any amendments. Staff are also given a copy of Channel Duty Guidance: Protecting vulnerable people from being drawn into terrorism (2015).

All permanent staff are required to complete a level two e-module on Prevent within the first month of their employment. These staff will be required to complete a refresher e-module every two years (or sooner if required as a result of a change in legislation).

3.1.2 Tutors

All new tutors (irrespective of duties) are given an induction by the Director of Programmes or Academic Programme Coordinator within which a copy of the Prevent Policy is issued and special attention drawn to the Academy Prevent reporting procedures. Tutors will previously have been alerted to the policy through the tutor handbook and they are kept informed of any amendments. Tutors are also given a copy of Channel Duty Guidance: Protecting vulnerable people from being drawn into terrorism (2015).

Tutors (core academic tutors and those teaching young artist courses) are required to complete a level two e-module on Prevent within the first month of their engagement. These staff will be required to complete a refresher e-module every two years (or sooner if required as a result of a change in legislation).

3.1.3 Key Staff

Comprehensive mandatory training on Prevent is provided for staff key to the effective implementation of the Academy's Prevent Policy (Prevent Officer, Operations Manager, Digital Manager, Academic Programme Coordinator, Programme Pathway Leaders, Executive Team). This will comprise of a mixture of externally delivered face to face training and e-modules. Face to face training will be delivered by the Police [Workshop to Raise Awareness of Prevent (WRAP)] and, where appropriate, organisations / trainers with expertise in Prevent in the HE sector and be appropriate in level to the requirements of staff roles/ levels of responsibility.

Such Mandatory training will be scheduled every two years. Additional training will be included in the CPD/ staff development schedule as required to address any changes in the legislation or result of any internal reviews and individually identified training needs.

3.1.4 Students

All academic students undergo an induction period where they are given a copy of the Prevent Policy and special attention drawn to the Academy Prevent reporting procedures. A summary of the Policy is additionally included in the student handbook and digital copies of Channel Duty Guidance: Protecting vulnerable people from being drawn into terrorism (2015) are made available to students through Moodle.

3.1.5 Trustees

Trustees have ultimate responsibility for approving the Prevent Policy. Upon appointment Trustees will be given a copy of Prevent Policy with special attention drawn to the report procedures. They are informed of amendments to the policy as part of the policy approval process. They will also be given access to a level two e-module on prevent, which they may complete on a voluntary basis for their general knowledge.

3.1.6 Guest/ external speakers

All guest speakers will be provided with a copy of the Academy's Prevent Policy along with the Freedom of Speech Policy. They will be asked to declare they have read and understood these documents before being allowed to speak.

3.2 Pastoral Care

The Academy is responsible for the welfare of all of its students. Pastoral care is a key way of safeguarding student welfare, particularly those who may be vulnerable to being drawn into terrorism. Pastoral care is the responsibility of the Personal and Academic Tutors (PATs). Training will be provided for all staff involved directly in student welfare, so that such staff are aware of their duties under Prevent, and understand the processes by which they can support vulnerable students. Advice and guidance is available for students should they require it from the Academic Team. All staff and students should be aware that, should they have concerns regarding the wellbeing of a student (or any other member of the Academy community, including staff), they can raise these in confidence with the relevant staff contact as outlined here.

4. Dealing with potential radicalisation/ extremism

It should be remembered that the Prevent duty covers all aspects of radicalisation, including far right extremism, animal rights extremism and so on.

Art Academy London works with communities and partner agencies particularly the Southwark Prevent Coordinators to safeguard vulnerable individuals who are at risk. The Academy will seek advice from them if there is an individual who is causing concern or if there is an external speaker scheduled about whom the Academy is concerned.

There is no single way of identifying who is likely to be vulnerable to being drawn into terrorism. Factors that may have a bearing on someone becoming vulnerable may include: peer pressure, influence from other people via the

internet, bullying, crime against them or their involvement in crime, anti - social behaviour, family tensions, race/ hate crime, lack of self-esteem or identity and personal or political grievances.

Some of the risk factors which could make a student susceptible to radicalisation are:

- A perception / experience of discrimination
- Experience of identity based harassment
- Significant change in life, such as family break up, unexpected failure of exams, confusion about the sense of purpose in life
- Depression or a feeling of worthlessness
- Negative views on policing
- Lack of trust in democratic government
- A perception that specific communities are being treated unfairly
- An aspiration to defend specific communities when they are perceived to be under attack or unjustly treated
- A perception of biased media coverage
- Personality driven factors
- Family or local allegiances
- A lack of a sense of 'belonging' and purpose
- A desire for status or excitement
- Socio- economic factors
- Contact with people expressing supremacist ideology, which sanctions the use of extreme violence as a response to perceived social injustice and dysfunction
- Rhetoric and language of apparently non-violent extremist groups
- Peer pressure

Supporting those at risk of being drawn into terrorism is often about diverting people away from harm at an early stage. People found to be at risk of radicalisation are offered support through the 'channel' programme. The Channel programme focuses on providing support at an early stage. It uses a multi-agency approach to protect vulnerable individuals by:

- Identifying individuals at risk
- Assessing the nature and extent of that risk; and
- Developing the most appropriate support plan for the individuals concerned.

Channel is about ensuring that vulnerable individuals of any faith, ethnicity or background receive support before they are exploited by those that would want them to embrace terrorism, and before they become involved in criminal activity. Channel is not about reporting or informing on individuals in order to prosecute them. It is based on the premise that communities working together to support individuals can be dissuaded from engaging in terrorist related or other illegal activity (sometimes described as de-radicalisation).

Reasons for referral can include any of the following high risk indicators:

- Expressed support for violence and terrorism
- Possession of violent extremist literature
- Attempts to access or contribute to violent extremist websites
- Possession of material regarding weapons and/or explosives
- Possession of literature regarding military training, skills and techniques

Account should also be taken of the following lower indicators:

- Claims of involvement in organisations
- Espousing violent extremist ideology
- Claims of attendance at training camps
- Claims of involvement in combat or violent activity on behalf of violent extremist groups.

5. Reporting matters of concern or instances requiring immediate response

5.1 Instances requiring immediate response.

In an emergency: If there is grave or immediate concern of danger to life, the correct procedure is to call 999 and then inform the Prevent Coordinator and Operations Manager immediately

In such instances a report should be retrospectively made using the standard Incident Report Form (Appendix A, also available on Moodle).

5.2 Reporting a concern

5.2.1 Concerns about an event, occurrence or visitor.

In the event of a staff member, tutor, student, volunteer or visitor becoming concerned by an event, occurrence or person on campuses they should either follow the procedure as outlined in 5.1, if appropriate, OR verbally inform the Operations Manager and the Prevent Coordinator verbally as soon as possible. All verbally reported concerns should also be formally recorded using the standard Incident Report Form. The Incident Report Form can be submitted retrospectively in such instances. The form should be emailed to the Prevent Coordinator, titled 'PREVENT CONCERN URGENT CONFIDENTIAL' and comply with the Academy's Information Security Procedures

Those reporting should make a comprehensive record of what is said or seen and actions taken at the earliest possible opportunity. The Prevent Coordinator may request further information from the reporting person and any witnesses identified in the Incident Report Form.

The Prevent Coordinator will assess the situation and, in consultation with the Principal and Operations Manager, make a decision about the seriousness of the situation and required action. If necessary the Prevent Coordinator will then contact the appropriate Police unit, dependent on the severity of the situation, The Prevent Coordinator, having contacted the Police, will then copy emails and relevant documents, including timelines and a narrative of events from the staff concerned, and hold them securely for reference. Apart from the Designated Person(s), records may only be shared with the Principal and any legitimate investigating authority. Records will be held for an appropriate period in accordance with the Academy's Record Retention Schedule and any statutory requirements for the retention of such data.

5.2.2 Concerns about a student

In the event of a staff member, tutor, student, volunteer or visitor becoming concerned about a student or member of staff, they should report their concerns to the Prevent Coordinator using the standard Incident Report Form.

Upon receipt of the concerns, the Prevent Coordinator will undertake a check as to whether there are other issues or concerns related to this student. A panel will then convene to consider the concerns and appropriate action. The panel will consist of:

- Prevent Coordinator
- Academic Programme Manager
- Operations Manager

The panel will decide what action to take, which could include the following:

- Inform the student that concerns have been raised and how to avoid the situation in future
- Give the student advice about their social media profile where appropriate
- Ask the student to come to an interview to discuss the concerns
- Contact the Prevent Coordinator at Southwark without giving personal details to gain further advice where it is considered that there may be issues related to extremism on a confidential basis
- Refer the student to 'Channel'
- Refer the situation to the police if it is believed that a criminal offence has taken place (in such instances, the student will be suspended, pending the investigation in accordance with the Student Disciplinary Policy).

If necessary the Prevent Coordinator will then contact 'Channel' / the Southwark Prevent Coordinator or the appropriate Police unit. The Prevent Coordinator will then copy emails and relevant documents, including

timelines and a narrative of events from the individual reporting concerns and minutes from the meeting of the panel, and hold them securely for reference. Apart from the Designated Person(s), records may only be shared with the Principal and any legitimate investigating authority. Records will be held for an appropriate period in accordance with the Academy's Record Retention Schedule and any statutory requirements for the retention of such data.

5.2.3 Concerns about member of staff or tutor

In the event of a staff member, tutor, student, volunteer or visitor becoming concerned about a student or member of staff, they should report their concerns to the Prevent Coordinator using the standard Incident Report Form. The Prevent Coordinator will immediately pass the information to the Principal, who will decide on an appropriate course of action in consultation with the Executive Team. Where the concern relates to a member of the Executive Team, the Trustee responsible for safeguarding and prevent will be consulted.

In such instances a similar actions as described in 4.2.1 above may be taken. Staff or Tutor Disciplinary procedures may be initiated and individuals may be suspended from duty whilst investigations are carried out.

6. Risk Assessment, Action Plan and Monitoring

As required by the Prevent Duty, the Academy will carry out an assessment of the risk of our students being drawn into terrorism. This risk assessment will be reviewed at least annually by the Board of Trustees. Where any significant risk is identified the Academy will consider what action might mitigate the impact/ likelihood of that risk crystallising, and if necessary include it in the Academy's Prevent Action Plan.

The Academy will actively monitor incidents and events (and the resulting action taken by the Academy) that fall under the remit of the Prevent agenda and report these along with requested data sets to the OfS annually as required under the legislation.

7. External Speakers

The Policy and Procedure on Freedom of Speech sets out how we will ensure that we meet the different legal requirements on us, not least the duty under the Education (No. 2) Act 1986 to secure freedom of speech within the law.

All external speakers and extra curricular events must be approved by the relevant member of staff (management or executive level). Where the views expressed constitute views that risk drawing people into terrorism, or are shared by terrorist groups, permission must be sought by the staff or student organiser from the Prevent Coordinator, who will consult as appropriate and will seek a decision from the Executive Team if necessary. Due diligence is carried out where required and we will share information with other institutions if appropriate about any event that comes within the remit of Prevent.

External leadership of any extra curricular student society is not permitted.

The Academy will not:

- Provide a platform for any proscribed terrorist organisation or permit the encouragement of terrorism in any way.
- Allow gender segregation at any event it organises or at events held on its premises.

8. Communications

Art Academy London will not permit material supporting terrorism to be displayed within Academy's premises and will remove any such material if it is found. Likewise, it will seek to ensure that the Academy'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 teaching and research activities, and this should be declared under the process described in section 9 below.

9. Sensitive Research/ Academic Freedom

The ability of students and staff to research, teach and debate any topic will not normally be restricted unless a specific threat is identified or a clear Prevent requirement exists. Art Academy London believes that general rules (and web-monitoring software) limiting access to the web or preventing the open discussion of particular topics will conflict with its obligations to enable academic and artistic freedom and should be avoided unless a very high level of justification exists.

In such circumstances where material could potentially be considered to be in contravention of the Prevent guidelines is to be presented, discussed or used for the purpose of research or the creation of artworks, notification of intentions should be passed to advice sought from the Director of Academic Quality, Standards and Student Experience (if potentially illegal material is involved). The IT users policy further outlines the procedure that should be followed if material that relates to the promotion of extremism/terrorism prior to the introduction of said material onto the Academy network.

The [IT users policy](#) is available on Moodle.

10. IT Networks

The Art Academy London IT user policy further elaborates on the Prevent duty and IT facilities. We consider it unacceptable for our IT networks to be used in any way that supports, promotes or facilitates terrorism. Relevant IT policies and procedures will be kept under review with reference to Prevent. The Academy will also keep the use of social media under review.

11. Faith Facilities

The Academy provides a prayer room to allow individuals to observe their faith and believes this essential to harmonious community relations and inter-faith dialogue and so are an important element of the Academy's Prevent approach.

12. Celebrating Diversity

The culturally diverse nature of Art Academy London is actively celebrated and promoted to counter the threat of radicalisation from external influences.

This policy complies with the public sector equality duty and requires all staff, students and visitors to respect the Academy's values, be sensitive to the diversity of our community and to show respect to all sections of that community. Monitoring should take place over time to ensure the Academy is aware of any trends or patterns emerging involving particular groups of people and impact of this policy on those groups.

13. Information Sharing & Confidentiality

The Academy 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 2018 (DPA 2018) and General Data Protection Regulations (GDPR).

All requests from the Police/Security Services are handled by the Prevent Coordinator. When considering sharing personal information, the Academy will always take account of necessity and proportionality; a professional judgement of the risks to the individual concerned or the public. Wherever possible the consent of the person concerned will be obtained before sharing the information.

All information concerning students and staff will be stored securely and in compliance with the Data Protection Act 2018 and GDPR. Records will be kept, archived and destroyed in accordance with the Academy's Record Retention Schedule.

13.1 Channel

The Prevent Coordinator will maintain the primary link with the Channel team, the Home Office appointed FE/HE Coordinator for the local area and other appropriate Police contacts. Under the 2015 Act alternative providers are required to provide information and cooperate with locally appointed Channel panels that may be assessing the needs of vulnerable students; the Prevent Coordinator will action any such request. S/he will attend all meetings, training and briefing events offered by statutory agencies in this regard and be primarily responsible for maintaining the Academy's statutory duty for the same, under the authority of the Principal and Board of Trustees.

14. Policy Review

The Prevent situation in terms of both statutory regulation and emerging risk factors is changing rapidly. It is essential therefore that this policy is kept under constant review by the Prevent Coordinator and brought back to the Board of Trustees on at least an annual basis for approval. Any changes made at annual review will be reported to the Executive Team and the Academic Board.

Policies and documents that supplement and reference this document:

IT User Policy
Safeguarding Policy
Freedom of Speech Policy
Equality and Diversity Policy and Strategy
Student support and guidance (including tutoring policy)
Student Handbook
Tutor Handbook
Staff Handbook
Moodle guide
Data Protection Policy
Information Security Strategy

Version 3   Sept 2018   Approved by the Academic Board & Board of Trustees

Appendix A - Incident Report Form

ART ACADEMY
LONDON

Incident Report Form

Completed by:

Name	
Job title	
Contact details	

Incident details			
Date		Time	
Where did the incident occur?			

Person affected		
Staff	Student	Visitor
Student ID		
Contact details		

About injury	
Injury description	
Injured parts of body	

Type of injury	
Was first aid administered?	Y	N
Were emergency services called?	Y	N

Time emergency services arrived		Time emergency services left	

Was casualty taken straight from scene to hospital?	Y	N

Police crime ref number (if applicable)	

About the Accident/ Incident
Full description - a fact based account of what happened including any immediate action taken:
Witnesses

Student	Staff	Visitor
Name	
Job Title/ student ID	
Contact details	

Student	Staff	Visitor
Name	
Job Title/ student ID	

Contact details		
Student	Staff	Visitor
Name		
Job Title/ student ID		
Contact details		

Signed		**Date**	