



Prevent policy

Policy owner:	Conservatoire Executive Committee
Lead contact:	Academic Registrar
Audience:	Applicants for Conservatoire programmes of study/students/staff
Approving body:	Board of Governors
Date approved:	February 2019
Policy Implementation date:	February 2019
Supersedes:	Prevent Policy August 2016
Previous approved version(s) dates:	August 2016
Review cycle:	Every three years
Next review due date:	February 2022
Related Statutes, Ordinances, General Regulations	Counter-Terrorism and Security Act 2015; Counter-Terrorism Strategy (CONTEST) 2018; UK Government Prevent Strategy 2011; Prevent Duty Guidance 2019; Equality Act 2010; Data Protection Act 2018; General Data Protection Regulations 2018
Related Policies, Procedures and Guidance:	Schools' Safeguarding policies; Schools' IT policies; Schools' Freedom of Speech policies; Non-Academic Misconduct Policy and Procedures
UK Quality Code reference:	Quality Code Expectations for Quality; Advice and Guidance: Concerns, Complaints and Appeals; Enabling Student Achievement; Student Engagement
OfS Conditions reference:	Conditions B2, B3, C1, C2
Equality and Diversity Considerations:	Policy should be available in accessible format for all students.
Date Equality and Diversity Assessment Completed:	February 2019
Further information:	

Conservatoire for Dance and Drama

Prevent Strategy and Policy¹

Background

Section 21 of the Counter-Terrorism and Security Act 2015 (the Act) places a duty on certain bodies, listed in Schedule 3 to the Act, to have “due regard to the need to prevent people from being drawn into terrorism”. The Act states that the authorities subject to the provisions must have regard to this guidance when carrying out the duty.

The current threat from Terrorism and Extremism in the United Kingdom is real and severe and can involve the exploitation of vulnerable people, including children and young people. This policy is designed to provide a clear framework to structure and inform our response to safeguarding concerns for those young people who may be vulnerable to the messages of extremism. In addition, 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.

The Conservatoire is an HE provider and a Recognised Higher Education Body on which the Prevent duty falls. It is comprised of six legally-independent member schools which deliver programmes of Higher Education in Bristol, Leeds and London. The Conservatoire’s governing body has established and agreed with its schools a risk assessment and action plan relating to Prevent. Reflecting the Conservatoire’s organisational structure, the Conservatoire’s Prevent duty is discharged through policies and procedures agreed with the schools and implemented at school level, as set out in its action plan.

The Conservatoire’s Prevent work is intended to deal with all kinds of terrorist threats to the UK. Threats to safety and security originate from a range of extremist groups. The Conservatoire recognises that the Prevent duty extends to persons who may be either students or staff.

The Conservatoire’s Prevent work depends on effective partnership within its own structures, between the Conservatoire and national partners (BIS, OfS) and between the schools and appropriate local Prevent partners.

Key roles in relation to Prevent within the internal structures of the Conservatoire and its schools are:

Cross-Conservatoire level:

- CDD Board of Governors (governing body): has overall responsibility for ensuring that the Conservatoire discharges its Prevent duty; presents an annual monitoring report to OfS

¹ The following policy is adapted from the policy developed by Northern School of Contemporary Dance, which includes guidance taken in part from the document ‘**Safeguarding Children and Young People from the Threat of Violent Extremism**’ produced by Leeds Safeguarding Children Board.

- Conservatoire Executive Committee: has management oversight of the implementation of the Conservatoire Prevent action plan and risk assessment; reviews and reports to the Board of Governors on the discharging of the Prevent duty.

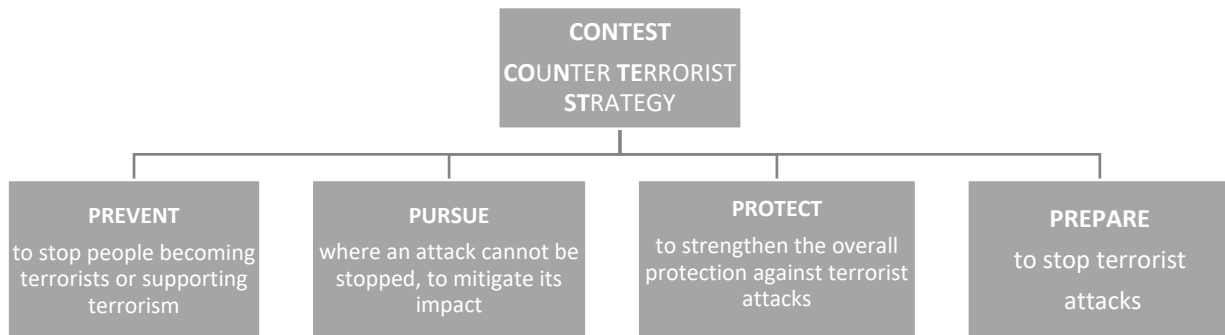
School level:

- Board of Governors: inputs to the CDD action plan and owns the schools' actions in relation to Prevent; ensures that appropriate policies, procedures and networks are in place within the school to enable the Prevent duty to be discharged;
- School Principal: has management oversight for the implementation of Prevent duty within the school
- Prevent Single Point of Contact (SPOC): liaises with the Conservatoire's central services to support the school Principal to discharge the Prevent duty; has designated responsibility for Channel referrals / liaison. The Principal shall determine arrangements for cover in the event of the non-availability of the normal SPOC.

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>

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.

Prevent and the Conservatoire

While the Conservatoire acknowledges the current level of national threat at any point in time, the small size of each of the Conservatoire's schools means that each school's senior management has good general oversight of activities within the school. This, combined with the nature of the vocational educational training delivered by the schools in the performing arts, means that the judgement of the Conservatoire is that the general risk of radicalisation is **manageable**.

As a Higher Education Provider, the Conservatoire strongly supports the principles of freedom of speech and academic freedom within the Law. While freedom of speech and academic freedom are key principles, the Conservatoire and its schools recognise that they also have a legal and moral duty of care for staff and students.

Nevertheless, the Conservatoire recognises its duty of due regard under the Act. Through this policy and the associated actions in its action plan, including the provision of effective campaigns of awareness, training and formalising of appropriate mechanisms, the Conservatoire intends to further reduce the likelihood of occurrence and also reduce the likely impact on the individuals concerned and on the organisation of any incident which might occur.

It also recognises that, on occasion, the performing arts may deal with extremist subject matter. It is committed to ensuring that, where appropriate, extremist subject matter which may be encountered by students in the course of their training, is contextualised by staff.

In particular, it considers that work to protect vulnerable individuals from violent extremism and the threat of radicalisation falls within the safeguarding arena and is no different to safeguarding individuals from a range of other forms of harm and abuse.

In this regard:

- radicalisation is usually a process and not an event, and it is possible to intervene in this to prevent vulnerable people being radicalised;
- there is a need to ensure that activities are proportionate, and focused upon people at risk;
- activity needs to address all forms of extremism. The Channel programme aims to support people who are at risk of being drawn into extremist activity. This involves several agencies working together to give individuals access to services such as health and education, specialist mentoring and diversionary activities;
- people with mental health issues or learning disabilities may be vulnerable to radicalisation, and it is important that all staff working in health and social care are aware of possible signs of radicalisation and how to refer people for further support.

Further information on the Prevent strategy can be found here:
<https://www.gov.uk/government/publications/prevent-duty-guidance>

Definitions and vulnerability factors

The Prevent Strategy defines extremism as follows:

“Extremism is vocal or active opposition to fundamental British values, including democracy, the rule of law, individual liberty and mutual respect and tolerance of different faiths and beliefs. We also include in our definition of extremism calls for the death of members of our armed forces, whether in this country or overseas.”

The Prevent Strategy defines radicalisation as follows:

“Radicalisation refers to the process by which a person comes to support terrorism and forms of extremism leading to terrorism.”

Radicalisation is usually a process, not an event. During this process, there may be opportunities to intervene in order to reduce the risk of the individual being attracted to extremist ideology and causes and safeguard them from the risk of radicalisation. It is important to be able to recognise the factors that might contribute towards the radicalisation of an individual. Indeed, some of the factors that lead an individual to becoming radicalised are no different to those that might lead individuals towards involvement with other activity such as gangs, drugs, sexual exploitation, etc.

Those involved in extremist activity come from a range of backgrounds and experiences. There is no single profile of what an extremist looks like or a 10 point plan of what might drive an individual towards becoming radicalised.

Vulnerability factors

A variety of factors might contribute towards an individual becoming radicalised. A table setting out some of the factors which might contribute is set out in one of the appendices to this policy.

Support and protocols in schools

As with other safeguarding issues, where a member of staff has any concerns that a person or their family may be at risk of radicalisation or involvement in terrorism, they should speak with the school's safeguarding lead (or equivalent member of staff) and/or the Prevent SPOC (if this is not the same person). If the concerns about an individual are not serious enough to be escalated or where there is no evidence that the individual is vulnerable to radicalisation the safeguarding lead / Prevent SPOC may decide that they can be addressed by action within the organisation. In this case, the organisation

should take the appropriate action to address any concerns, and review whether the concerns remain after this.

Where it is deemed that there is a risk to an individual in the context of radicalisation to extremist ideology and causes, the individual should be referred to the Channel programme.

Channel Programme

Channel is a key element of the Prevent strategy. It is a multi-agency approach to protect people at risk from radicalisation. Channel uses existing collaboration between local authorities, statutory partners (such as the education and health sectors, social services, children's and youth services and offender management services), the police and the local community to:

- **identify** individuals at risk of being drawn into terrorism;
- **assess** the nature and extent of that risk; and
- **develop** the most appropriate support plan for the individuals concerned.

Channel is about safeguarding persons from being drawn into extremist activity leading to violence against others. It is about early intervention to protect and divert people away from the risk they face before they are involved in any type of illegal activity.

The Channel process identifies those most at risk of radicalisation, and refers them via the local authority or police for assessment by a multi-agency panel. The panel, chaired by the local authority, considers how best to safeguard them and support their vulnerability through a support package tailored to individual needs. This is similar to the way in which individuals at risk from involvement in crime, drugs and other social issues are supported. Partnership involvement ensures that those at risk have access to a wide range of support ranging from mainstream services, such as health and education, through to specialist mentoring or faith guidance and wider diversionary activities. Each support package is monitored closely and reviewed regularly by the multi-agency panel.

Further information about the Channel programme can be found here:

https://www.gov.uk/government/uploads/system/uploads/attachment_data/file/118194/channel-guidance.pdf

Prevent-related serious incident reporting

The OfS Prevent-related serious incident guidance places formal responsibility on all relevant higher education bodies (RHEBs) to determine what constitutes a Prevent-related serious incident that needs to be reported, and to report it following the principles set out in the note and the associated reporting requirements.

The OfS expect a provider to report any incidents or developments which:

- have led to the review and substantive revision of Prevent-related policies
- have caused harm to staff and students or reputational harm
- could be reasonably perceived as being related to Prevent.

Examples of serious incident reporting include (but are not limited to) **hate crime, arrests and charges, harm** (either reputational harm or harm to staff and students), **failure of Prevent-related policies and processes**, and **near misses**.

Providers are expected to report an actual or suspected Prevent-related incident promptly. OfS guidance states that providers should contact the OfS at the time when a potential serious incident is identified, and no later than five days after the incident occurring or being identified. In the case of 'near misses', this should be as soon as it is deemed that a potential incident would have impacted on Prevent duty implementation had it progressed to its conclusion. The OfS does not require personal data to carry out its function, and personal information is not shared as part of this reporting.

The Conservatoire has a process in place for serious incident reporting as part of its implementation of Prevent Strategy.²

Further information about Prevent-related serious incident reporting can be found here:

<https://www.officeforstudents.org.uk/media/29154421-d3e7-4989-9e53-94413fd013f9/ofs-prevent-related-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-higher-education-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 Section 4.

want to raise a concern, they should contact the School's Prevent SPOC. A list of Prevent SPOCs is included in one of the appendices to this policy.

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.

Implementation of the Conservatoire's Prevent Strategy

1.0 Staff training

1.1 The Conservatoire and schools recognise the need to provide appropriate training for staff involved in the implementation of this duty.

1.2 The awareness of staff and students regarding the rationale for Prevent and the approach being adopted is being raised through the provision of guidance and briefings. Staff will be advised about how to obtain support for people who may be being exploited by radicalising influences.

1.3 Staff in schools (at least one per school) who have key roles relating to vulnerable students have been appropriately trained with reference to Prevent.

1.4 Each school will have a Prevent Single Point of Contact (SPOC) with designated responsibility for Channel referrals / liaison and establish appropriate arrangements to ensure cover for this role.

1.5 Wherever possible, the Conservatoire and schools will work with or through external Prevent partners to provide training for its staff.

2.0 Information Sharing

2.1 The Prevent programme must not involve any covert activity against people or communities. However, specified authorities may need to share personal information to ensure, for example, that a person at risk of radicalisation is given appropriate support (for example on the Channel programme). Information sharing must be assessed on a case-by case basis and is governed by legislation. To ensure the rights of individuals are fully protected, schools will ensure that appropriate information-sharing protocols are used at a local level.

2.2 When considering sharing personal information, the school will take account of the following:

- Necessity and proportionality: personal information should only be shared where it is strictly necessary to the intended outcome and proportionate to it. Key to determining the necessity and proportionality of sharing information will be the professional judgement of the risks to an individual or the public.

- Consent: wherever possible the consent of the person concerned should be obtained before sharing any information about them.
- Power to share: the sharing of data by public sector bodies requires the existence of a power to do so, in addition to satisfying the requirements of the Data Protection Act 2018, General Data Protection Regulation (GDPR) 2018 and the Human Rights Act 1998.
- Data Protection Act and the Common Law Duty of Confidentiality: in engaging with non-public bodies, a body on which the Prevent duty falls should ensure that they are aware of their own responsibilities under the Data Protection Act.

2.3 Acting in accordance with these principles regarding personal information, the Prevent SPOC may seek advice regarding a Prevent-related concern from within the school, from within the Conservatoire, or from sources external to the Conservatoire before determining whether further action should be taken in relation to a concern about an individual or individuals.

2.4 Where a referral is made to Channel in relation to a student, the Chief Executive Officer of the Conservatoire should be notified.

3.0 Disclosure and Referrals relating to staff and students

3.1 Where a member of staff has any concerns about a student relating to Prevent, as a matter of urgency they should refer the matter to the school's Prevent SPOC or, in their absence, a member of the Safeguarding team or the Leadership Team.

3.2 There may be some circumstances where the school, in the course of Prevent-related work, identifies someone who may already be engaged in illegal terrorist-related activity. People suspected of being involved in such activity should be referred to the police by the school Prevent SPOC or their delegated alternative.

4.0 Reporting of Serious Incidents

4.1 SPOCs should report any potential Prevent-related serious incidents to the CDD Prevent Lead as soon as they occur or are identified, to allow for gathering any additional information if necessary. The Prevent Lead, in consultation with the Chief Executive Officer (as Accountable Officer), will determine whether there is a need to formally report a matter to the OfS as a serious incident.

5.0 Prevent Compliance

5.1 The Conservatoire and schools fully recognise their role in helping prevent people being drawn into terrorism, which includes not just violent extremism but also non-violent extremism, which can create an atmosphere conducive to terrorism and can popularise views that terrorists exploit.

5.2 They understand that radicalisation is usually a process, not an event. During that process, behaviours as well as opinions are likely to change. These changes may be apparent to the friends, families and work colleagues of the person concerned.

5.3 The Conservatoire and schools will aim to ensure that their arrangements for the implementation of the Equality Duty balance their responsibilities towards equality with their responsibilities to protect student and staff welfare under the Prevent duty.

5.4 The Prevent work undertaken will be closely aligned with the existing Safeguarding or equivalent procedures.

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

5.6 The school Prevent SPOC will decide upon whether a referral to an external agency is appropriate. Where appropriate and legal to do so, the school Prevent SPOC will share information with other institutions and key partners, such as the local Prevent group.

5.7 Each school will ensure its Safeguarding policy (or equivalent) is aligned with the Prevent duty. Each school will ensure that it abides by any locally agreed inter-agency procedures relating to safeguarding.

5.8 With regard to partnership activities, the Conservatoire and schools shall determine the applicability of this policy to the activity concerned, and may apply this policy in whole or in part to partnership activities in order to ensure that the Prevent duty of the Conservatoire is discharged.

5.9 The Board of Governors (governing body) of the Conservatoire will ensure that the Conservatoire discharges its duty in relation to Prevent. This shall include ensuring that policies and procedures, and external networks, are in place within the schools to discharge the duty. The Board of Governors of the Conservatoire shall submit an annual monitoring report to OfS.

5.10 The Governing Body of each school will ensure that appropriate policies, procedures and networks are in place to enable the Prevent duty of the Conservatoire to be discharged. Where the Prevent duty also falls directly on a school, the school shall set out any additional arrangements in relation to the discharge of its duty in a school Prevent policy.

6.0 Prevent risk assessment and outside speakers

6.1 The Conservatoire and schools take seriously their responsibility, where necessary and in line with their Codes of Practice on Freedom of Speech, to exclude those promoting extremist views that support or are conducive to terrorism.

6.2 Each school has a robust system for assessing and rating risks associated with any planned events and visiting speakers, providing evidence to suggest whether an event should proceed, be cancelled or whether mitigating action is required.

6.3 Further details of the policies and procedures relating to the use of premises by external groups and speakers shall be set out in a school policy document.

7.0 Online safety and access to extremist / terrorism- related materials

7.1 The Conservatoire and schools will implement appropriate steps with regard to online and e-Safety in order to discharge the Prevent duty. This may include 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.

7.2 The Conservatoire and schools 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.

8.0 Prayer or Faith Facilities

8.1 Where schools have prayer or faith facilities, the school will ensure that there are clear and widely available policies and procedures.

9.0 Vulnerable persons: Staff

9.1 The Conservatoire and schools recognise that the Prevent duty extends also to staff and will ensure that policies and procedures relating to vulnerable staff take appropriate account of the Prevent duty.

Contacts

See list of School Prevent Single Points of Contact in the Appendix.

Main contact for the Conservatoire for Dance and Drama:

Jill Leigh (Academic Registrar, Conservatoire for Dance and Drama):

jill.leigh@cdd.ac.uk

Postal address:

Conservatoire for Dance and Drama

Units 1-3, The Energy Centre

Bowling Green Walk

London N1 6AL

Version History

Draft approved by CDD Board of Governors	13 July 2016
Minor modifications on behalf of CDD BoG	1 August 2016
Updates to contacts in Appendix 2	22 March 2017
Updates to contacts in Appendix 2, external references and internal committees	5 December 2018
Update regarding serious incident reporting	27 February 2019
Updates to contact details, external links and references to previously affiliated schools.	23 June 2020

Appendix 1: 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 2: List of school Prevent SPOCS

Bristol Old Vic Theatre School (BOVTS)	Julia Heeley	julia.heeley@oldvic.ac.uk
Central School of Ballet (CSB)	Debra Cougill	debra.cougill@csbschool.co.uk
London School of Contemporary Dance (LSCD)	Martin Hargreaves	Martin.Hargreaves@theplace.org.uk
The National Centre for Circus Arts (National Centre)	Stevie Taylor	stevie@nationalcircus.org.uk
Northern School of Contemporary Dance (NSCD)	Tracy Witney	tracy.witney@nscd.ac.uk
Rambert School of Ballet and Contemporary Dance	Darren Ellis	darren.ellis@rambertschool.org.uk

Appendix 3: Additional Links, Further Sources and Useful Information

UK Government Prevent Strategy 2011:

(https://www.gov.uk/government/uploads/system/uploads/attachment_data/file/97976/prevent-strategy-review.pdf)

Counter-terrorism strategy (CONTEST) 2018

(https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/716907/140618_CCS207_CCS0218929798-1_CONTEST_3.0_WEB.pdf)

Statutory Guidance relevant to Higher Education and Monitoring of Higher Education

(<https://www.officeforstudents.org.uk/advice-and-guidance/regulation/counter-terrorism-the-prevent-duty/>)

Channel: Protecting vulnerable people from being drawn into terrorism

(<http://www.npcc.police.uk/documents/TAM/2012/201210TAMChannelGuidance.pdf>)

UUK Guidance on External Speakers in Higher Education: (<http://www.universitiesuk.ac.uk/policy-and-analysis/reports/Pages/external-speakers-in-higher-education-institutions.aspx>)

Safer Campus Communities – resources for Higher Education providers:

(<http://www.safecampuscommunities.ac.uk/resources>)