

Prevent Policy

London Campus

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1. Purpose

The purpose of this policy is to:

- Ensure awareness of Prevent within ESCP Business School
- Provide a clear framework to structure and inform our response to Prevent concerns, including a supportive referral process for those who may be susceptible to the messages of extremism.
- Recognise current practice which contributes to the Prevent agenda.

2. Scope

The Prevent Policy applies to everyone working at or attending ESCP Business School. It confers responsibilities on all staff, students, agency staff and volunteers, contractors, visitors, consultants and those working under self-employed arrangements. The Prevent Policy applies to all staff and (where relevant) students of ESCP Business School. This includes:

- All individuals (whether academic staff or otherwise) whose normal place of work is on our London campus
- All registered students at ESCP Business School (whether full-time or part-time)
- The officers and employees of ESCP Business School
- All bodies or persons not associated with ESCP Business School who hire or otherwise use ESCP Business School's facilities

3. Policy Statement

ESCP Business School is required under the Counter-Terrorism and Security Act 2015 to 'have due regard to the need to prevent people from being drawn into terrorism'. Under section 29, it must have regard to guidance issued by the Home Secretary. The Prevent Duty Guidance for higher education institutions in England and Wales came into effect on 18 September 2015 following approval by Parliament. Some of the ways in which we meet these responsibilities are set out in this document. The aim of the Prevent Policy is to create and maintain a safe, healthy and supportive learning and working environment for our students, staff and visitors alike. We recognise that extremism and exposure to extremist materials and influences can lead to poor outcomes for students. We further recognise that if we fail to challenge extremist views, we are failing to protect our students from potential harm.

The Prevent Duty guidance for higher education institutions in England and Wales was updated in 2019. It is monitored by the Office for Students (OfS), which has provided a [framework](#) that all registered higher education providers in England are expected to satisfy.

4. Background Information and Legal Context

ESCP Business School welcomes the Government's intention that the Prevent Duty is implemented 'in a proportionate and risk-based way' and that it should not create large new burdens on institutions. We, therefore, intend to implement our legal responsibilities as part of our existing policies and procedures, which we also consider to be the best way of ensuring a joined-up approach. We are also

responsible for protecting academic freedom and general freedom of expression. ESCP Business School, in accordance with legislative requirements under the Counter Terrorism and Security (CT&S) Act 2015, is required to practically manage the risk of radicalisation and the development of extremist views among employees and students. To meet legal requirements, ESCP Business School is required not only to conduct a risk assessment, but also to conduct an ongoing management and operational process to ensure that the risk is reduced to an acceptable level. It is important that it is recognised as essential that the human rights and principles of free speech in the academic community are championed, maintained and preserved. CT&S Act 2015 Part 5 Ch1 Sect 31 makes direct and clear reference to this requirement.

The national Prevent Duty confers mandatory duties and responsibilities on a range of public organisations, including Private H.E providers like ESCP Business School, and seeks to:

- Respond to the ideological challenge of terrorism and aspects of extremism and the threat we face from those who promote these views.
- Provide practical help to prevent people from being drawn into terrorism and violent extremism and ensure they are given appropriate advice and support.
- Work with a wide range of sectors where there are risks of radicalisation which needs to be addressed, including education, criminal justice, faith, the internet and health.

5. Objectives

Our Prevent Policy has some key objectives:

- Commitment to fostering an inclusive environment in which the principles of academic freedom and freedom of speech underpin our educational institution.
- To break down segregation among different student communities including by supporting interfaith and inter-cultural dialogue and understanding, and to engage all students in playing a full and active role in wider engagement in society.
- Commitment to ensuring vulnerable individuals are safeguarded from being drawn into terrorism.
- To provide support for students who may be at risk of radicalisation and appropriate sources of advice and guidance.
- To ensure that students and staff are aware of their roles and responsibilities in preventing violent and non-violent extremism.

6. Definitions

The following are commonly agreed definitions within the Prevent agenda:

- **An ideology** is a set of beliefs.
- **Radicalisation** is the process by which a person comes to support terrorism and forms of extremism that may lead to terrorism.
- **Safeguarding** is the process of protecting vulnerable people, whether from crime, other forms of abuse or from being drawn into terrorism-related activity.

- **Terrorism** is an action that endangers or causes serious violence, damage or disruption and is intended to influence the Government or to intimidate the public and is made with the intention of advancing a political, religious or ideological.
- **Vulnerability** describes factors and characteristics associated with being susceptible to radicalisation.
- **Extremism** is vocal or active opposition to fundamental British Values, including democracy, the rule of law, individual and mutual respect and tolerance of different faiths and beliefs.

7. Prevent Lead for ESCP Business School

The UK Director of Student and Academic Services Campus has been identified as the Prevent Lead responsible for ensuring that ESCP Business School complies appropriately with the Prevent Duty in liaison with the DfE regional Prevent coordinator and other key stakeholders within and beyond the School. They also ensure that our Prevent Strategy is implemented across the London Campus and that any concerns are shared with the relevant organisations in order to minimise the risk of our students becoming involved with terrorism.

8. Academic Standards and Quality Committee

The Academic Standards and Quality Committee

- ensures that the staff has undertaken training in Prevent Duty.
- all ESCP Business School staff are aware of when it is appropriate to refer concerns about students, learners or colleagues to the Prevent lead
- policies and procedures to implement the Prevent Duty are in place and acted on where appropriate.

9. Responsibilities of Staff

All staff have a responsibility to:

- Create and support an ethos that upholds ESCP Business School, the School's mission, vision and values to create an environment of respect, equality and diversity and inclusion;
- Attend Prevent training in order to have the skills to recognise those who may be vulnerable to radicalisation, involved in violent or non-violent extremism, and to know the appropriate action to take if they have concerns;
- Report and remove any literature displayed around the Campus that could cause offence or promote extremist views;
- Support the development of staff and student understanding of the issues around extremism and radicalisation through activities such as training, awareness campaigns and tutorials;

10. Leadership and Values



- Creating and maintaining the School's ethos that upholds core values of shared responsibility and well-being for all students, staff and visitors whilst promoting respect, equality and diversity and understanding.
- Promoting core values of respect, equality and diversity, democratic society, learner voice and participation.
- Building staff and student understanding of the issues and confidence to deal with them through mandatory staff training, awareness campaigns and community engagement activities.
- Deepening engagement with local communities and faith groups where appropriate.
- ESCP Business School discharges this responsibility in partnership with other agencies, including the Police, Local Authorities and DfE Prevent team.

11. Welfare Support

ESCP Business School has a duty of care towards its students and is committed to providing an environment that promotes opportunities to learn and develop as individuals. We take seriously our responsibility to ensure the safety and wellbeing of students, staff and the wider community. Welfare support is available to students in a variety of ways at ESCP Business School. Specialist support is a key way of safeguarding student welfare, particularly for those who may be vulnerable to being drawn into terrorism. Pastoral care is delivered through Academic Tutors and Student Services, with an email also sent to all students from the UK Director of Student and Academic Services Campus with details of the 'Empathy line' service offered free of charge to ESCP Business School students. Training is provided for all staff involved directly in student welfare so that they are aware of their duties under Prevent and understand how they can support vulnerable students. The management team will meet every term, and any concerns raised under the Prevent agenda or changes to the duty that affect ESCP Business School are discussed.

All staff and students should be aware that, should they have concerns regarding the well-being of a student, they can raise these in confidence with the UK Director of Student and Academic Services Campus.

12. Faith Facilities

ESCP Business School seeks to ensure that appropriate provision is made for those of any faith (or those without faith) to access appropriate facilities for pastoral care and religious purposes. We provide an appropriate classroom on Campus if a request is made, and this is monitored by reception and security.

13. IT Networks

ESCP Business School considers 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 University will also keep the use of social media under review. Any extremist material identified on social media services such as Facebook, and Twitter which are reported to



ESCP Business School, will be investigated accordingly. ESCP Business School takes the challenges presented by social media very seriously.

14. Communications

ESCP Business School will not permit material supporting terrorism to be displayed within the Campus and will remove any such material if it is found. Likewise, we will seek to ensure that ESCP Business School 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.

15. Managing Risks and Responding to Events

This Risk Assessment and Action Plan provide a risk-aligned and updatable point of reference, guidance and direction for ESCP Business School in relation to its statutory and legal duties in accordance with the CT&S Act 2015, Prevent guidance, and other laws and regulations.

16. External Speakers

Both the External Speakers (Policy) and 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. Under the Policy, where there is a doubt that the views expressed would risk drawing people into terrorism or are shared by terrorist groups, permission must be sought by the organiser from the UK Director of Student and Academic Services Campus, who will consult as appropriate and will seek a decision from the Board 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.

17. Referral of Concerns Regarding Radicalisation

- Any member of ESCP Business School (student or staff member) may identify concerns about a student potentially being drawn into violent extremism based on information received or behaviour observed.
- It is important that such concerns can be shared in a safe and supportive fashion to enable concerns to be investigated and appropriate intervention to be developed if required.
- It is equally important that assumptions are not made on the basis of information received and that referrals are investigated thoroughly and fairly. ESCP Business School will seek to approach such concerns from the perspective of safeguarding the individual about whom concerns have been expressed.
- Only where there is clear and compelling evidence of a requirement to do so will information be shared with other agencies.
- Where a student or staff member has concerns that a student is expressing violent extremist views or is at risk of being drawn into violent extremism, these concerns should be passed to the UK Director of Student and Academic Services Campus, who is the School's Prevent lead.

- UK Director of Student and Academic Services Campus (Prevent lead) will investigate the matter, seeking to gather the substantive information and evidence which would allow a full consideration of the case.
- Once all the evidence is gathered, the Prevent lead will refer the matter to the School Management Board, and a decision will be made as to the seriousness of the case. Three potential outcomes are likely at this stage:
 - No further action is required
 - There is substance to the case and external support is being considered. Advice may be sought from the Prevent Coordinator, Police Prevent Team or Channel Coordinator for the area in question. School Management Board will be fully briefed.
 - A referral to the Police is required because there are serious and immediate issues of safety to the student or others, and/or there is evidence to suggest a criminal act may be committed or has been committed.

18. Information Sharing

ESCP Business School is aware of the Channel process and of the opportunities for informal and formal sharing of information with relevant authorities. ESCP Business School 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. ESCP Business School will share only sufficient and relevant information in order to allow the concern to be appropriately followed up. Information sharing will only take place with external authorities when this is consistent with the provisions of the Data Protection Act (1998).

19. Staff Training and Awareness

The UK Director of Student and Academic Services Campus, Quality Manager and/or a nominated member of staff attends training events and briefings from the Home Office, OfS, security services and police as appropriate. The School carries out training on a regular basis for all relevant staff so that they can recognise those who are vulnerable to being drawn into terrorism and potential signs of radicalisation. WRAP training is normally carried out after consultation with our DfE Prevent Coordinator. It includes an explanation of how to handle appropriately and sensitively any concerns that may emerge. For those with whom any specific concerns will be raised (primarily staff in Student Services), differentiating the risk of radicalisation from other issues will be covered in more detail, together with the opportunities and requirements to share information confidentially where needed. Our approach is to support vulnerable students in whatever circumstance they find themselves, recognising that radicalisation could occasionally occur when certain behaviour is manifest but that other explanations will usually apply.

20. Training Students

A copy of Prevent Policy is available online for students. Moreover, Prevent awareness is included in student induction sessions and in the Student Handbook.

21. Involvement of Senior Management

Our Prevent lead provides updates and regular table discussions at the School Management Board (SMB). The Dean of the School, who chairs the SMB, provides an annual briefing and delivers a report to the Audit and Risk Committee, outlining relevant changes to the Prevent Agenda and detailing actions taken at ESCP Business School to ensure compliance and student safety.

22. Teaching and Administrative staff

Our teaching and administrative staff who interacts with students receive mandatory training, briefings and updates from the UK Director of Student and Academic Services Campus (Prevent lead). In addition, all new members of staff receive Prevent training as part of their induction programme.

23. Related Policies & Procedures

This policy should be used in conjunction with the following policies and procedures:

- Freedom of Speech Policy
- Health and Safety Policy
- Student Health and Wellbeing Policy
- Personal Data Protection Policy
- Acceptable Use IT Policy
- Disciplinary Policy and Procedure (Staff)
- External Speakers Policy
- External speakers' code of conduct

24. Policy Review

The policy is normally reviewed annually by the Academic Standards and Quality Committee.