



Prevent Policy

MLA College Prevent Policy
Sponsor: Director of Professional Services
Version 2.0 (August 2023)
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MLA College is committed to helping achieve the United Nations Sustainable Development Goals. Whilst consideration has been given to the design of this document to reduce the use of printer ink and paper, please consider the environment before printing and only do so if absolutely necessary.

1. Introduction

1.1 **Background** - The UK Government published the Prevent Strategy in 2011, one of four strands of the wider counter-terrorist strategy 'Contest'. The Counter-Terrorism and Security Act (2015) introduced a package of further measures aimed at countering the risk of terrorism, and as part of this it is mandatory for all Further and Higher Education Institutions "to have due regard to the need to prevent people from being drawn into terrorism".

1.2 The Prevent Strategy deals with all forms of terrorism, including non-violent extremism, which can create an atmosphere conducive to terrorism. The Strategy makes clear that preventing people becoming terrorists or supporting terrorism requires a challenge to extremist ideas, where they are used to legitimise terrorism, and appropriate interventions to stop people moving from extremist (legal) groups into terrorist-related activity.

1.3 **Prevent and MLA College** - The underlying considerations adopted by MLA College in implementing the Prevent Duty are:

- a commitment to the safety and wellbeing of our staff and students, including not being victims of, or complicit with any activities linked to radicalism;
- preserving equality and diversity as foundations of MLA College, whilst ensuring that these values are not threatened;
- promoting The rule of law; Individual liberty; Mutual respect and tolerance;
- to continue to champion the spirit of academic freedom and freedom of speech set out in our Academic Freedom Policy;
- that the requirements described in this policy are implemented in a proportionate and risk-based manner.

2. Definitions

2.1 The key definitions for the purposes of this policy are taken from the guidance issued from the UK Home Office related to the Prevent Duty:

Extremism – 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;

Radicalisation – the process by which a person comes to support terrorism and extremist ideologies associated with terror groups;

Terrorism – an action that endangers or causes serious violence to a person/people; causes serious damage to property; or seriously interferes or disrupts an electronic system. The use or threat must be designed to influence the government or to intimidate the public, and is made for advancing a political, religious, or ideological cause;

Investigation - where a Prevent related concern about a student or member of staff is raised, the Prevent Coordinator will be notified. The Prevent Coordinator will review the concern and will escalate this to the appropriate external agency if they consider that the concern has substance. MLA College will refer all cases externally where there is considered to be any risk of a Prevent related concern.

3. Criteria

3.1 This procedure is applicable to all MLA College staff (including temporary staff), volunteers and students.

4. Guide to the Policy

4.1 **Introduction to the policy** - This policy details how to raise concerns relating to radicalisation, extremism or terrorism (including vulnerability to these).

4.2 A large proportion of MLA College's student population is resident outside of the United Kingdom. Whilst the Prevent Duty is relevant only to those based within the UK, MLA College will offer support to overseas students via the Student Support Officer. MLA College also has a moral obligation to consult its Department for Education Coordinator, and the police, should a threat which falls outside the Prevent Duty remit become apparent.

4.3 Timescales

Issue	Timescale
Staff or student has a concern that they need to refer to the MLA College Prevent Coordinator (Academic Registrar)	Immediately wherever possible. Where a staff member cannot immediately notify the Prevent Coordinator (for example on a weekend), the staff members should make the referral as soon as possible and should notify the police by calling 999 in an emergency.
Prevent Coordinator will acknowledge concern and begin investigation.	1 working day.
Prevent Coordinator will close concern, offering ongoing support if appropriate.	This will be dependent on the case, the needs of the learner, and the guidance from the Local Authority / Department for Education.

4.4 **Support available** - MLA College offers support services to students through the academic team (including Programme Managers and Module Tutors) and the MLA College Student Support Officer. Where a student shows a change in behaviour which raises concerns about radicalisation, including online activity such as on the Total Learning Package (TLP) or in a video conferencing session, MLA College will follow up and support the student as required, to check for welfare concerns and offer support. This may include where it has been identified there is a possibility of a student being radicalised.

4.5 **Outcomes of the procedure** - Both students and staff are asked to refer any concerns they have about a member of staff or student that is at risk of being radicalised or drawn into extremism or terrorism (as per the process in [section 5](#)). It is important that any concerns are shared in a safe and supportive manner, to enable concerns to be investigated and any appropriate intervention to be developed. MLA College will investigate any reported issues through speaking with students or members of staff, where appropriate, to gather further information. All concerns will be considered thoroughly and fairly.

4.6 There are three potential outcomes of the investigation:

- a. No further action is required. In this instance a confidential record of the case will be kept.
- b. There is substance to the concern, but it is not related to Prevent. Internal action is required. The exact nature of the action taken will depend on the nature of the case, but

most likely supportive intervention would be provided.

- c. If there are significant issues which suggest that a criminal act may be or has been committed, or that the health, safety or welfare of a student or others is at risk, then MLA College will refer the case externally.

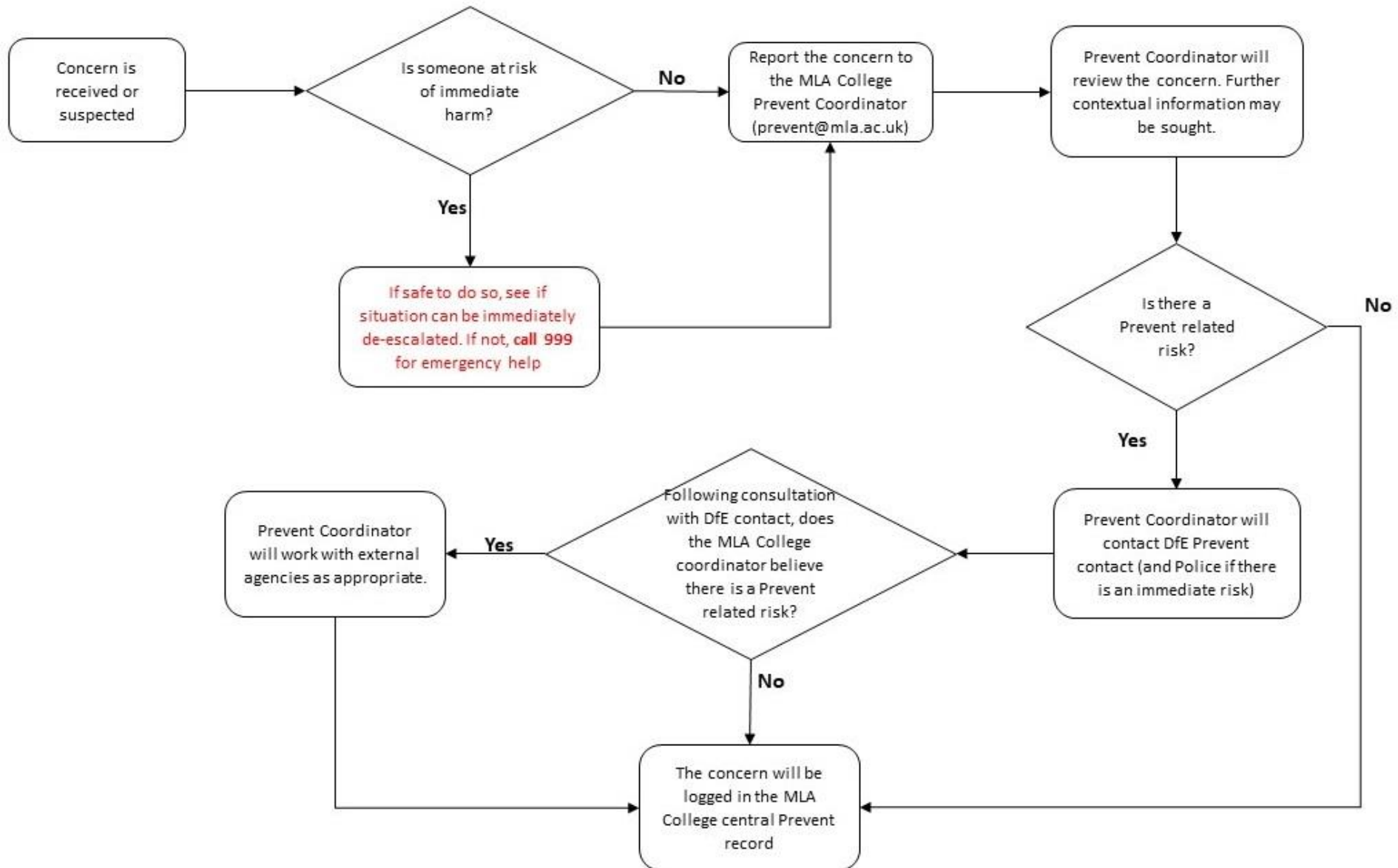
4.7 If a concern is deemed to be related to radicalisation, MLA College will work closely with representatives from the Department of Education which may result in a recommendation of a referral to the Channel Programme via the Prevent National Referral Form ([Annex A](#))

4.8 Channel is an early intervention, multi-agency process designed to safeguard vulnerable people from being drawn into extremism. If a Prevent referral is accepted by the Channel programme, the MLA College Prevent Coordinator will support the Channel panel.

4.9 A confidential record of all internal and external referrals made under this policy will be kept by the MLA College Prevent Coordinator.

4.10 In cases where outcomes 1 or 2 described above are necessary, or in the case of a vexatious referral, MLA College may take further actions in line with other MLA College Policies and Procedures, including disciplinary action as appropriate, or termination from programme.

5. Stages of the Procedure



Note - The Prevent Duty is relevant for all UK based students. Should a concern be raised over a non-UK based student, MLA College will offer support to overseas students via the Student Support Officer. MLA College also has a moral obligation to consult its Department for Education Coordinator, and the police, should a threat which falls outside the Prevent Duty remit become apparent.

6. Guidelines for Members of Staff/Students

- 6.1 **Concerning behaviour** - It can be difficult to know which behaviours should be treated as concerning. Just because an individual is displaying concerning behaviour, this does not necessarily mean that there is a Prevent concern. However, someone who is displaying concerning behaviour is likely to be vulnerable, and so the Student Support team should be made aware. MLA College adopts the approach that if you are unsure, then you should always refer.
- 6.2 For example, a concern could include messages that you consider inappropriate on the MLA College website forum; which may be due to the content of the message or language that is used.
- 6.3 Action Counter Terrorism provides additional information on identifying signs of radicalisation
- 6.4 **Leadership and Governance** - MLA College takes its statutory responsibility seriously, with oversight by the MLA College Senior Management Team to ensure that the organisation satisfies the requirements of the Prevent duty. MLA College has delegated responsibility of leadership and implementation to the Director of Professional Services as MLA College's Prevent Coordinator who will provide a monthly report to the Senior Management Team (SMT). The Prevent Duty is a standing agenda item at the monthly meeting of SMT.
- 6.5 **Risk Assessment and Action Plan** - MLA College has undertaken a Prevent Risk Assessment and Action Plan to establish how and where students and staff might be drawn into terrorism. The Risk Assessment and Action Plan is reviewed annually by the Senior Management Team, or sooner if updates are required due to major changes to Prevent Duty or in response to major events. At present, the risks are considered to be low, due to the nature of MLA College's delivery. MLA College does not have a physical campus or Student Union, students are not using MLA College IT systems and MLA College does not hold in-person events.
- 6.6 MLA College recognises and takes seriously its responsibilities and will therefore keep the level of risk under review.
- 6.7 **Staff Training** - MLA College ensures that all of its staff have receive training on how to identify staff and students that are at risk of radicalisation and may be drawn into terrorism. New members of staff should complete their Prevent training within 2 weeks of commencing employment with MLA College. A log of this training, including timeframes for updates, is maintained internally. Staff training will be formally refreshed every 2 years, or sooner if a major change or event occurs.
- 6.8 Temporary staff and/or volunteers working for MLA College must participate in Prevent training. Where a temporary staff member/volunteer is working for MLA College for a period of more than a month, the staff member should complete the full Prevent training available. Where a temporary staff member and/or volunteer is expected to work for MLA College for a period of less than a month, they should meet with the Prevent Coordinator to go through expectations relating to Prevent and should be supervised closely by their line manager.

7. Monitoring and review

- 7.1 The Prevent Coordinator will review this policy, and its related documents, at least annually, to ensure it remains up to date and compliant with relevant legislation and requirements.

8. Benchmarked Policies and Guidance

- 8.1 This policy should be read in conjunction with the following policies, procedures, and guidance documents:

- [Academic Freedom Policy](#)
- [Access and Participation Statement](#)
- [Privacy Policy](#)
- [IT Acceptable Use Policy](#)
- [Ethics Policy](#)

MLA Prevent Policy - Annex A

REFERRAL PROCESS	
<p>By sending this form you consent for it to arrive with both your dedicated Local Authority safeguarding team & Prevent policing team for a joint assessment. Wherever possible we aim to give you feedback on your referral, please be aware, however, that this is not always possible due to data-protection & other case sensitivities.</p> <p>Once you have completed this form, please email it to: PLEASE ENTER THE PREVENT TEAM EMAIL ADDRESS</p> <p>If you have any questions whilst filling in the form, please call</p>	
INDIVIDUAL'S BIOGRAPHICAL & CONTACT DETAILS	
Forename(s):	First Name(s)
Surname:	Last Name
Date of Birth (DD/MM/YYYY):	D.O.B.
Approx. Age (if DoB unknown):	Please Enter
Gender:	Please Describe
Known Address(es):	Identify which address is the Individual's current residence
Nationality / Citizenship:	Stated nationality / citizenship documentation (if any)
Immigration / Asylum Status:	Immigration status? Refugee status? Asylum claimant? Please describe.
Primary Language:	Does the Individual speak / understand English? What is the Individual's first language?
Contact Number(s):	Telephone Number(s)
Email Address(es):	Email Address(es)
Any Other Family Details:	Family makeup? Who lives with the Individual? Anything relevant.

DESCRIBE CONCERNS	In as much detail as possible, please describe the specific concern(s) relevant to Prevent.
Please Describe	
<p>FOR EXAMPLE:</p> <ul style="list-style-type: none"> • How / why did the Individual come to your organisation's notice in this instance? • Does it involve a specific event? What happened? Is it a combination of factors? Describe them. • Has the Individual discussed personal travel plans to a warzone or countries with similar concerns? Where? When? How? • Does the Individual have contact with groups or individuals that cause you concern? Who? Why are they concerning? How frequent is this contact? • Is there something about the Individual's mobile phone, internet or social media use that is worrying to you? What exactly? How do you have access to this information? • Has the Individual expressed a desire to cause physical harm, or threatened anyone with violence? Who? When? Can you remember what was said / expressed exactly? • Has the Individual shown a concerning interest in hate crimes, or extremists, or terrorism? Consider <i>any</i> extremist ideology, group or cause, as well as support for "school-shooters" or public-massacres, or murders of public figures. • Please describe any other concerns you may have that are not mentioned here. 	
COMPLEX NEEDS	Is there anything in the Individual's life that you think might be affecting their wellbeing or that might be making them vulnerable in any sense?
Please Describe	

PERSON WHO FIRST IDENTIFIED THE CONCERNS

Do they wish to remain anonymous?	Yes / No
Forename:	Referrers First Name(s)
Surname:	Referrers Last Name
Professional Role & Organisation:	Referrers Role / Organisation
Relationship to Individual:	Referrers Relationship To The Individual
Contact Telephone Number:	Referrers Telephone Number
Email Address:	Referrers Email Address

PERSON MAKING THIS REFERRAL (if different from above)

Forename:	Contact First Name(s)
Surname:	Contact Last Name
Professional Role & Organisation:	Contact Role & Organisation
Relationship to Individual:	Contact Relationship to the Individual
Contact Telephone Number:	Contact Telephone Number
Email Address:	Contact Email Address

RELEVANT DATES

Date the concern first came to light:	When were the concerns first identified?
Date referral made to Prevent:	Date this form was completed & sent off?

FOR EXAMPLE:

- Victim of crime, abuse or bullying.
- Work, financial or housing problems.
- Citizenship, asylum or immigration issues.
- Personal problems, emotional difficulties, relationship problems, family issues, ongoing court proceedings.
- On probation; any erratic, violent, self-destructive or risky behaviours, or alcohol / drug misuse or dependency.
- Expressed feelings of injustice or grievance involving any racial, religious or political issue, or even conspiracy theories.
- Educational issues, developmental or behavioural difficulties, mental ill health (see **Safeguarding Considerations** below).
- Please describe any other need or potential vulnerability you think may be present but which is not mentioned here.

OTHER INFORMATION	Please provide any further information you think may be relevant, e.g. social media details, military service number, other agencies or professionals working with the Individual, etc..
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Please Describe

REFERRER'S ORGANISATIONAL PREVENT CONTACT (if different from above)

Forename:	Referrers First Name(s)
Surname:	Referrers Last Name
Professional Role & Organisation:	Referrers Role / Organisation
Relationship to Individual:	Referrers Relationship To The Individual
Contact Telephone Number:	Referrers Telephone Number
Email Address:	Referrers Email Address

SAFEGUARDING CONSIDERATIONS

Does the Individual have any stated or diagnosed disabilities, disorders or mental health issues?	Yes / No
Please describe, stating whether the concern has been diagnosed.	
Have you discussed this Individual with your organisations Safeguarding / Prevent lead?	Yes / No
What was the result of the discussion?	

Have you informed the Individual that you are making this referral?	Yes / No
What was the response?	
Have you taken any direct action with the Individual since receiving this information?	Yes / No
What was the action & the result?	
Have you discussed your concerns around the Individual with any other agencies?	Yes / No
What was the result of the discussion?	

INDIVIDUAL'S EMPLOYMENT / EDUCATION DETAILS	
Current Occupation & Employer:	Current Occupation(s) & Employer(s)
Previous Occupation(s) & Employer(s):	Previous Occupation(s) & Employer(s)
Current School / College / University:	Current Educational Establishment(s)
Previous School / College / University:	Previous Educational Establishment(s)

THANK YOU
<p>Thank you for taking the time to make this referral. Information you provide is valuable and will always be assessed.</p> <p>If there is no Prevent concern but other safeguarding issues are present, this information will be sent to the relevant team or agency to provide the correct support for the individual(s) concerned.</p>