

Referral Policy

Referral of a member of the University of London believed to be at risk of being drawn into terrorism

Approved : Board of Trustees 13.7.2016

1. This policy applies to all staff¹ and to students living in intercollegiate Halls and/or registered with the School of Advance Study (SAS) or University of London International Programmes (UoLIA) and based in the UK. The policy does not apply to students or staff at the University of London in Paris (ULIP) or to students outside the UK registered in UoLIA.

Background and Legal Application

2. The “Prevent duty” has its origins in the Counter-Terrorism and Security Act 2015 (the 2015 Act), which places on universities (and other specified bodies) the duty to “have due regard to the need to prevent people from being drawn into terrorism” (the Prevent duty”).
3. All members of the University should be mindful of the University’s responsibilities under the Act.
4. Terrorism is defined in the Terrorism Act 2000 as the use or threat of action which involves serious violence against a person; involves serious damage to property; or endangers a person’s life; or creates a serious risk to the health and safety of the public or a section of the public; or is designed seriously to interfere with or to disrupt an electronic system. The use or threat must be designed to influence the government or to intimidate the public and is made for the purpose of advancing a political, religious, racial or ideological cause.
5. Extremism is defined in the statutory Prevent Duty Guidance as “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 . . . [and] . . . calls for the death of members of our armed forces, whether in this country or overseas”.

¹ This policy uses the definition of staff given in the Financial Regulations: the definition of “staff” is all employees, workers and contractors including external examiners, visiting lecturers and fellows of the University, as well as for members of the Board of Trustees and other formal committees or boards of the University or departments insofar as they are acting on University business.

Indicators of Risk

6. There is no single way to identify an individual who is likely to be vulnerable to being drawn into terrorism but some of the indicators might be:
 - a. Expression of views which are discriminatory against protected groups or individuals
 - b. Third party reports of concerns about behaviour e.g. plans to undertake extended periods of travel to international locations known to be associated with terrorism
 - c. Exclusion of certain groups or individuals from activities which appear to be for extremist or discriminatory reasons
 - d. Direct disclosure from the individual of vulnerability to being drawn into terrorism
 - e. Evidence of friends or family concern about vulnerability to extremism
 - f. Evidence of discriminatory treatment of other groups or individuals
 - g. Evidence of non-compliance with normal expectations of behaviour or shared values within our society, in the context of the definition of “extremism”
 - h. Possessing, accessing or requesting extremist materials, unless doing so for academic study
 - i. Expression of extremist views and sharing of extremist materials including on social media
 - j. Use of extremist language
 - k. Threats of violence
 - l. Enabling non-University members who are a cause for concern in the context of this policy to access University grounds or buildings and/or to distribute materials promoting terrorism.

Identifying Individuals at Risk

7. It is NOT your responsibility to determine whether there is a genuine risk, or to challenge another member of the University, BUT you are obliged under this policy to report appropriately if you believe that you have justified cause for concern. All reports will be treated in a secure and confidential way.

Reporting Concerns

8. Concerns should be reported to a senior member of staff. Thus, for example;
 - a. Referral of a member of staff: If you have concerns related to a staff member, you should inform a senior member of staff -- for example, the appropriate Director.
 - b. Referral of a student in SAS ; If you have concerns related to a student in SAS, you should inform the Deputy Chief Executive of SAS, who will initiate the process below.
 - c. Referral of a student living in intercollegiate Halls: If you have concerns about a student living in an Intercollegiate Hall, you should inform the Hall Manager

or Hall Warden who will initiate the process below, as well as ensuring that there is close liaison with the student's College throughout.

- d. Referral of a UoLIA student in the UK; If you have concerns related to a student in the International Programmes, you should inform the Director of Operations for UoLIA, who will initiate the process below.

Referral to Chaplaincy and commissioned welfare services

9. The University Chaplaincy and welfare services (e.g. counselling) commissioned by the University are bound by this policy and are expected to report concerns around extremism or risk of being drawn into terrorism where they can do so.

Review Process

10. Following a referral under paragraph 8 above, the University's Prevent Co-Ordinator will first discuss the facts and circumstances of the case with the person making the referral, as well as the additional duties on the University under the Act to have particular regard to (a) the duty to ensure freedom of speech and (b) the importance of academic freedom. If the Prevent Co-Ordinator is satisfied that no further action is required, no further steps will be taken and no record will be kept of the proposed referral.
11. If the Prevent Co-Ordinator believes further action is necessary, s/he will wherever possible advise the individual of the review and seek their consent before sharing any information about them.
12. A review of the concerns reported will be undertaken to clarify the issues and seek any other relevant information. The review will be commissioned by the University Prevent Co-Ordinator, and undertaken by an appointed officer e.g. Senior Contractor Manager, Head of Residential Accommodation, a Hall Warden or appropriate Director. A decision will be made by the University Prevent Co-Ordinator, in consultation with the reviewer and with other appropriate internal or external advisers.
13. There are three likely outcomes:
 - a. No further action is required under this policy, and no records will be kept.
 - b. Internal action is required and appropriate intervention planned, which will be supportive in nature. A confidential record will be kept, in accordance with the University's Data Protection obligations and Retention Policy.
 - c. An external referral is required. Depending on the nature of the concerns, there are two routes available:
 - i. referral to the Police if there is evidence to suggest that a criminal act may have been committed or is about to be committed; or
 - ii. referral to the Regional Prevent Co-ordinator or the Channel Programme (a multi-agency panel established by HM Government as part of the

Prevent agenda to identify and provide support to individuals who are at risk being drawn into terrorism

14. A confidential record of all external referrals made under this policy will be kept and only shared externally where there is a clear and compelling need to so. Any decision to share information externally will be made within the requirements of the University's Data Protection Policy and Information Sharing Policy.