

Prevent Policy

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The Prevent Policy will be reviewed annually by the Document Lead. Any significant changes beyond the scope of an annual review will require the approval of our Senior Management Team (SMT).

1. Introduction

Under the Counter-Terrorism and Security Act 2015, we are required to 'have due regard to the need to prevent people from being drawn into terrorism'. The way in which we need to comply with the Counter-Terrorism and Security Act 2015 is set out in the *Prevent duty guidance for higher education institutions in England and Wales* which came into effect on 18 September 2015 and was last revised in December 2023. Matters which affect compliance with the Prevent Duty (as set out in the OfS's monitoring guidance) are considered reportable events by the OfS.

Prevent works within a non-criminal space, using early engagement to encourage individuals and communities to challenge violent extremist ideologies and behaviours. We therefore view and would encourage our students and staff to view Prevent as a safeguarding exercise aimed at preserving the wellbeing of our academic community.

Prevent is part of a broader counter-extremism strategy known as Contest. Contest has the following four strands:

- **Pursue:** to stop terrorist attacks;
- **Prevent:** to stop people becoming terrorists or supporting terrorism;
- **Protect:** to strengthen our protection against a terrorist attack;
- **Prepare:** to mitigate the impact of a terrorist attack.

The objectives of Prevent are to:

- tackle the ideological causes of terrorism (which the government states involve reducing "permissive environments");
- intervene early to support people susceptible to radicalisation;
- enable people who have already engaged in terrorism to disengage and rehabilitate.

Our Prevent duties are currently shared in part with our academic partner institutions and Birkbeck College (our supplier of classroom, social space, and library facilities).

2. Definitions

The following definitions come from HM Government Prevent Strategy 2011.

Radicalisation is defined as the process by which people come to support terrorism and extremism and, in some cases, to then participate in terrorist activity.

Extremism is the promotion or advancement of an ideology based on violence, hatred or intolerance, that aims to:

1. negate or destroy the fundamental rights and freedoms of others; or
2. undermine, overturn or replace the UK's system of liberal parliamentary democracy and democratic rights; or
3. intentionally create a permissive environment for others to achieve the results in (1) or (2).

Terrorism is an act 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 the purpose of advancing a political, religious or ideological cause. Terrorism is not confined simply to acts of violence,

it extends also to non-violent acts. Non-violent terrorism takes the form of popularising views which terrorists exploit. Obvious terrorist groups include Islamist extremists and white supremacists.

3. Scope

Our Prevent Policy applies to all staff at Bloomsbury Institute (including external consultants) and relevant sections apply to all students.

4. Our approach

We believe that our obligations under the Prevent duty offer an opportunity to consolidate the duty of care we have already set out in our existing [Safeguarding Policy](#)¹ and general welfare procedures. Our approach is very much determined by the focus we place on the safety and wellbeing of individuals. Safeguarding our students and staff from radicalisation or terrorism is no different from protecting them from any other forms of harm.

Guided by our [Equality, Diversity and Inclusion Policy](#)² which explicitly recognises the importance of inclusion in order to mitigate the risk of radicalisation, we feel that we have created the community cohesion that lies at the heart of Prevent. Indeed, our Equality, Diversity and Inclusion Committee (EDIC) and Head of Hospitality and Events play a very active part in promoting and celebrating as many multicultural events as possible in order to foster a real sense of community.

We believe that the more open and equal a society or environment we create, the less likely it is for students or staff to go down the radical path. We recognise that failure to include students and staff can marginalise them and lead to radicalisation. We also believe that we can develop resilience to extremism through education and debate. In the case of our students, by helping them to develop critical thinking skills, we are able to provide them with an important tool against the risk of radicalisation and possible terrorism. In this way, we are equipping our students with skills to be applied outside the confines of Bloomsbury Institute.

When carrying out the Prevent duty, we will ensure compliance with other legal obligations including the Equality Act (2010), the Data Protection Act (2018) and our duties to protect freedom of speech and academic freedom.

In view of the above, we welcome the recognition given in the Prevent duty guidance to the importance of individual institutions taking a proportionate and risk-based approach to meeting their Prevent obligations.

5. Leadership

The Prevent Lead has operational responsibility for coordinating compliance with the Prevent duty. Executive oversight rests with the Chief Operating Officer (or nominated senior leader), while ultimate accountability rests with the Board of Directors. The staff members responsible for the operational and executive oversight are supported by our Senior Management Team (SMT), who provide further oversight of Prevent duties in terms of approving and amending Prevent policy and procedural documents, receiving bi-monthly Prevent update reports from the Prevent Lead and receiving risk assessments for recommended approval on a quarterly basis. See **Section 6**.

Our Board of Directors has ultimate responsibility for ensuring compliance with the Prevent duty through the receipt of a quarterly Prevent Risk Assessment and a Prevent Annual Report from the Prevent Lead. Both documents are submitted to the Board following recommended approval by the SMT. In addition, the Audit and Risk Committee receives from the Head of Compliance a Compliance Report at every meeting that provides an update on matters where there are known or emerging risks or issues in any regulatory or legislative areas of compliance, as well as assurance on what has been / is being / will be actioned by way of remediation. The Audit and Risk Committee is then responsible for reporting to the

¹ <https://www.bil.ac.uk/qem/section-3/>

² <https://www.bil.ac.uk/qem/section-3/>

Board any key issues and has the discretion to share with the Board any given Compliance Report. It is on the basis of these reporting mechanisms that the Board of Directors is able to submit to the Office for Students an annual declaration of compliance and Accountability Data Return.

The Board of Directors' responsibilities in relation to Prevent are included also in our Directors' Induction, Training and Development Programme.

6. Risk assessment

Our Prevent Lead is responsible for reviewing our Prevent Risk Assessment on a quarterly basis (March, June, September and December) for recommended approval by the SMT to the Board of Directors. However, ad hoc reviews can be conducted by the SMT at any time in the event of organisational change or a likely or specific threat occurring.³

7. Responsibilities

Primary responsibility for student welfare or pastoral support lies with our Centre for Student Engagement, Wellbeing and Success (SEWS) and our Disability and Wellbeing team. Given that we firmly believe that Prevent is an extension of our Safeguarding Policy and procedures, our Centre for Student Engagement and Wellbeing (SEWS) assumes front-line ownership of our Prevent obligations, and our Director of SEWS is the point of contact for any safeguarding referrals raised by her SEWS team or other third parties. Upon investigation, if the Director of SEWS decides that the concern is Prevent-related, she will refer the matter to the Prevent Lead. The Prevent Lead will investigate further (if need be) and decide on appropriate actions. In the absence of the Director of SEWS and/or the Prevent Lead, their respective roles would be undertaken by the Chief Operating Officer (or nominated senior leader). See **Appendix C** for details of our referral reporting process.

See **Appendix D** for a summary of Prevent responsibilities.

8. Training

Compulsory Prevent awareness training covering the following areas is incorporated within our Continuing Professional Development Programme for all staff:

- What is radicalisation and the radicalisation process.
- The Prevent Duty and what it means in practice.
- Implementing Prevent sensitively to protect both people and their freedoms.
- Promoting tolerance.
- Recognising vulnerability to radicalisation.
- Responding to concerns in terms of knowing where to get advice and support.
- Understanding next steps and how Channel can help and support vulnerable individuals.

The training takes the form of an overview session from the Prevent Lead for all new staff in week 2 of them joining Bloomsbury Institute, and completion of an online training course within the first month of joining and every other year thereafter. Completion of the compulsory Prevent training is monitored by our People and Development team and is reported upon within our Annual Staff Appraisal and Development Scheme.

³ The Senior Management Team meets every two months, but extraordinary meetings can be called at any time.

Coverage of our institutional Prevent obligations and links to all relevant policies are also included in our Staff Handbook which is one of the key company documents all staff are required to read. In addition, this policy document and all related policies are available from [Part 3 of our online Quality and Enhancement Manual](#)⁴.

Prevent is also covered within our Board of Directors' Induction, Training and Development Programme and focuses on the Board's legal duties, and the directors' key responsibilities.

9. Causes for concern

We have a duty of care to identify, protect and support a student or staff member who may be at risk of radicalisation or who may have already been radicalised. This duty of care extends both to the individual concerned and to the wider community. It is crucial therefore that when addressing any concerns that you or a third party might have, you bear in mind the need for factual evidence: either your own observations of what an individual might have said or how an individual might be behaving, or information disclosed to you by a third party e.g. an individual's friends, peers or tutors. Assumptions should not be made.

There is no single profile or pathway leading to terrorism and no definitive checklist of signs of radicalisation. However, there are certain risk factors which may increase vulnerability to radicalisation as well as possible signs of radicalisation. Some of these signs could also point to other causes for concern e.g. mental health issues, domestic abuse, and alcohol or drug abuse.

Risk factors may include⁵:

- A need to control and dominate others.
- A need for identity, meaning and belonging.
- Criminality. A time in prison. Previous involvement with criminal groups.
- Mental health issues.
- Being from a vulnerable age group.
- Having lost interest in friends or activities.
- Feelings of injustice or having political grievances.
- Family tensions resulting in a sense of isolation.
- A sense of isolation as a result of feeling or being treated differently.
- Migration. Living and studying or working in a different country.
- Distance from cultural heritage. Not feeling comfortable in their surroundings resulting in an identity crisis.
- Experience of racism or discrimination resulting in a sense of grievance.
- Feeling of failure. Unmet aspirations.

Signs of radicalisation may include:

⁴ <https://www.bil.ac.uk/qem/section-3/>

⁵ These factors do not indicate radicalisation in themselves but may increase vulnerability when considered alongside other evidence.

- Accessing extremist content online or downloading propaganda material.
- Expressing extremist views and advocating the use of violence to solve societal issues.
- Belief that their culture or religion is under threat and only violence or war can solve issues.
- Significant behavioural or appearance changes when considered alongside other relevant evidence
- Intolerance - being unwilling to engage with people who they see as different.
- Using certain symbols associated with terrorist organisations.
- Levels of engagement. The individual may go missing without notice or begin to attend/engage erratically.
- Performance. Standards or patterns of work may deteriorate significantly. The individual might start to miss deadlines or meetings in contrast to previous performance.
- Appearance. The individual may begin to dress in a significantly different manner.
- The way an individual sounds or speaks. The individual may suddenly become very quiet or very loud, or become very agitated.
- Mood. The individual's mood may differ from what is usual for them.
- Behaviour. The individual may begin to behave in a very unusual, hostile or aggressive manner.
- Interests and views. The individual may take an interest in and express radical views or express sympathy for those who uphold radical views.

Although you may feel that the concern you have is relatively small and possibly isolated, you are encouraged to share it with the Director of SEWS because others may have already shared similar concerns and when considered together, these multiple concerns could present a very compelling argument for either safeguarding intervention of a general nature or intervention by the Prevent Lead, if there is a suggestion that it is a Prevent-related matter. The Director of SEWS will record any concerns and action taken in our Safeguarding Referral Form, as will the Prevent Lead if any issues are referred on to her by the Director of SEWS. See **Appendix B**. The completed forms and any accompanying evidential documents will be stored by the owners in a secure site (be it in electronic or hard copy format).

10. Referral of concerns regarding radicalisation

Where there are reasonable concerns supported by evidence, Bloomsbury Institute may refer individuals to Prevent or other appropriate agencies. We also have the option of discussing any concerns we might have with a number of experts in this area. See **Section 12** on Channel. However, we have to balance our duty here with a commitment to freedom of speech and academic freedom (as set out in our [Code of Practice on Freedom of Speech and Academic Freedom](#)⁶ and the requirements of legislation such as the Data Protection Act 2018, the UK General Data Protection Regulation (UK GDPR), and the Equality Act 2010. See **Appendix A** for details of the legislative framework within which we are required to operate. The Prevent Lead is ultimately responsible for making the above judgement in consultation with our Head of Compliance.

⁶ <https://www.bil.ac.uk/qem/section-3/>

The Prevent Lead is also responsible for determining whether any concerns raised are serious enough to warrant a referral and, if they are, the body or agency to which the referral should be made. The Prevent Lead will make the decision based on evidence gathered following any safeguarding referral of a Prevent nature by the Director of SEWS.

It is important to remember that any concerns regarding a student or staff member should be treated with discretion. Information about the individual concerned should only be shared on a “need to know” basis with due regard to the Data Protection Act 2018 and the UK General Data Protection Regulation.

In the event of the Prevent Lead determining that an external Prevent referral is necessary, they can seek support and advice from the partners referenced in Section 11 below. In addition, the government has published advice on how to prepare a referral. This advice is available from the link below:

[Making a referral to Prevent - GOV.UK \(www.gov.uk\)](https://www.gov.uk/guidance/making-a-referral-to-prevent#preparing-a-prevent-referral)⁷

See **Appendix C** for summary details of the referral process.

11. Partnerships

Our Local Authority - Camden Council - has a Community Safety Partnership which manages crime and public safety issues. One of its key priorities is tackling hate crime, preventing extremism and building community cohesion. At the heart of this activity is Camden Council's Prevent Programme Manager who is available to provide us with advice.

We also have a DfE FE/HE Regional Prevent Co-ordinator and Prevent contacts within our partner institutions.

12. Channel

Channel is an early intervention process designed to safeguard vulnerable people from being drawn into violent extremist or terrorist behaviour. Involved in the process are a range of multi-agency partners⁸ which form part of a Panel chaired by the relevant local authority. Each Channel Panel is tasked with assessing the risk an individual might pose together with the support package needed for that individual. Each support package is tailored to the individual and his/her particular vulnerabilities. These may be in relation to health, education, employment, housing or faith guidance, for example.

Engagement with Channel is voluntary and so the consent of the individual concerned is required. The Prevent Lead can seek advice around Channel from the Prevent Co-ordinator at Camden Council, and the DfE FE/HE London Regional Prevent Co-ordinator. Contact details for both have been included in our Prevent Referral Process document.

13. Ways of mitigating risks

There are a number of ways of mitigating risks which enhance and augment our work of creating an equal, inclusive and supportive environment, ensuring staff awareness and establishing information sharing mechanisms both internal and external. These include the following:

13.1 Management of external speakers and events

Our risk-based approach to complying with our Prevent duties can be seen in the way in which we balance the need for freedom of speech and academic freedom within the law with our obligation to ensure the welfare of our staff and students. This approach is set out in our External Speaker Policy which outlines the procedures we have in place for assessing risk in order to ensure that we do not unwittingly provide a platform for radicalisation and terrorism either within our premises or partner premises, online or through our Bloomsbury Radio broadcasts.

⁷ <https://www.gov.uk/guidance/making-a-referral-to-prevent#preparing-a-prevent-referral>

⁸ Social Care, Police, Health, Education, Probation, Housing, Youth Offending Service.

We have a formal procedure in place for seeking approval of an event at which an external speaker is to be invited. This involves completion of an External Speaker Request Form (Form A)⁹ by the event organiser and due diligence checks by the Prevent Lead (the Reviewer)¹⁰. If the Prevent Lead has any doubt about potential risks or where the Prevent Lead deems any potential risks as being medium or high, the Prevent Lead may seek additional information by consulting with the event organiser¹⁰ over completion of External Speaker Request Form B, and will discuss the Request Form with the Chief Operating Officer¹¹. If the Prevent Lead judges that (a) there is a risk of the speaker expressing extremist views that risk drawing people into terrorism and that (b) we are unable to mitigate that risk¹² by ensuring that opposing views are expressed, we would cancel the event. We would also cancel the event if we were in any doubt about whether we could fully mitigate the risk.

13.2 IT policies

Staff and students using Bloomsbury Institute's IT facilities and resources are subject to our institutional ICT policies which include an [Email Acceptable Use Policy](#) and an [Internet Acceptable Use Policy](#)¹³. These policies address both Prevent and equality, diversity and inclusion issues.

13.3 Social media

We recognise that although there are many benefits from using social media in terms of reaching out to and engaging with others and building relationships, there are also a number of risks. Vulnerable individuals are particularly susceptible to radicalisation through social media platforms.

Our [Information Control Procedures](#)¹⁴ set out the internal procedures we have in place to ensure that all our institutional communications are accurate and (where applicable) that there is compliance with relevant legislative provisions. The Information Control Procedures also cover the use of online content and the regular audit of such content. These areas are also explored and regulated in our [Social Media Communications Policy](#)¹⁵.

Our Marketing Manager audits and monitors all posts regularly and is responsible for removing any inappropriate materials. In the event of any interventions being required, these would be recorded (and, if relevant, reported to the Prevent Lead) and procedures reviewed accordingly.

13.4 Branding

Our Marketing team have developed Communication Principles and Brand Guidelines. In addition, our [Information Control Procedures](#) make it clear that there are only a limited number of personnel who have authority to publish or change content available to the general public. It is, therefore, easy for us to control brand consistency.

Our Marketing Manager is responsible for checking Google and all our social media channels on a regular basis for mentions of Bloomsbury Institute. This will alert us to any cases of our brand being misused.

⁹ Available from the CETL site on Canvas or the Prevent Lead .

¹⁰ In the absence of the Prevent Lead , the Head of Compliance will conduct the necessary due diligence checks.

¹¹ In the absence of the Chief Operating Officer, the Prevent Lead will refer the request to the Chief Executive Officer.

¹² The ways in which we are able to mitigate risks are set out fully in our External Speaker Policy.

¹³ <https://www.bil.ac.uk/qem/section-3/>

¹⁴ <https://www.bil.ac.uk/qem/section-3/>

¹⁵ <https://www.bil.ac.uk/qem/section-3/>

14. Research Ethics Committee

Bloomsbury Institute staff and any students undertaking collaborative research with one of our staff members, are required to comply with our [Research Ethics Code of Practice¹⁶](#). This Code sets out very clearly the approval process in the case of potentially highly sensitive topic areas and includes provision for the Chair of the Research Ethics Committee to ask the Prevent Lead to make a recommendation to the Research Ethics Committee with regards to research ethics approval in relation to the research topic.

15. Gender segregation

We are committed to promoting a general culture of equality, diversity and inclusion throughout our staff and student community. Our responsibilities in this respect are set out in our [Equality, Diversity and Inclusion Policy¹⁷](#) which, in turn, is determined by our obligations under the Equality Act 2010. In line with these obligations, we will not allow organised segregation of any form at lectures, seminars, meetings or events of any kind. The only exception we would make to this ruling would be in the case of collective religious worship or observance. Instead, we support the right of people to sit or stand in any particular groupings that they choose to form.

16. Potential terrorist incidents

We provide our staff with advice and guidance on how to identify and respond to a terrorist incident. This information is contained within a procedures document that is one of the key company documents on BreatheHR that all staff are required to read.

17. Review of the Prevent Policy

Our Prevent Policy will be subject to formal review by the Prevent Lead on an annual basis unless risk factors change or a situation presents itself that warrants an immediate review. In the case of the latter any amended documents will be submitted at an emergency meeting of our Senior Management Team.

18. Related regulations, policies and procedures

Bloomsbury Institute

- Safeguarding Policy
 - Safeguarding Referral Form
 - Safeguarding Referral Process
- Data Protection and Confidentiality Policy
- Equality, Diversity and Inclusion Policy
- External Speaker Policy
 - External Speaker Request Form A
 - External Speaker Request Form B
- Information Control Procedures

¹⁶ <https://www.bil.ac.uk/qem/section-3/>

¹⁷ <https://www.bil.ac.uk/qem/section-3/>

- Internet Acceptable Use Policy
- Email Acceptable Use Policy
- Research Ethics Code of Practice
- Social Media Communications Policy

Appendix A: The Legislative Framework for our Prevent Policy

The following list is not exhaustive.

- Computer Misuse Act (1990)
- Communications Act 2003
- Copyright, Designs and Patents Act 1988
- Counter-Terrorism and Security Act 2015
- Counter-Terrorism and Border Security Act 2019
- Criminal Justice and Immigration Act 2008
- Criminal Justice and Public Order Act 1994
- Data Protection Act 2018
- Education [No 2] Act 1986
- Equality Act 2010
- Freedom of Information Act (2000)
- UK General Data Protection Regulation (UK GDPR)
- Higher Education (Freedom of Speech) Act 2023
- Human Rights Act (1998)
- Malicious Communications Act 1988
- Obscene Publications Act 1959
- Offences against the Person Act 1861
- Revised Prevent duty guidance for Higher Education Institutions in England and Wales (2023)
- Prevent duty Guidance update: a briefing for Higher Education Providers (HEPs)
- Protection from Harassment Act 1997
- Public Meeting Act 1908
- Public Order Act 1986
- Regulation of Investigatory Powers Act (2000)
- Terrorism Acts 2000 and 2006

Appendix B: Safeguarding Referral Form

CONFIDENTIAL

Safeguarding Referral Form

Section A: Personal details of the person about whom there is a safeguarding concern

Name	
Date of Birth	
Job Role or Student Number (if relevant)	
Address	
Telephone Number	
Email Address	

Section B: Person reporting the incident/concern

Name	
Job role or student number as applicable	
Telephone Number	
Email Address	
Relationship to student or staff member	

Section C: Reasons for Referral

Outline the reasons for the referral.

Section D: Action Taken

Outline any action taken (and by whom) prior to referral of the incident or concern.

Detail any conversations that have taken place with the individual concerned regarding the above, indicating who has been involved in those discussions.

Section E: Other staff informed

Name(s)	
Position	

Name(s)	
Position	

Name(s)	
Position	

Section F: External partners informed

Name	
Position/Organisation	
Contact details	

Section G: Form completed by

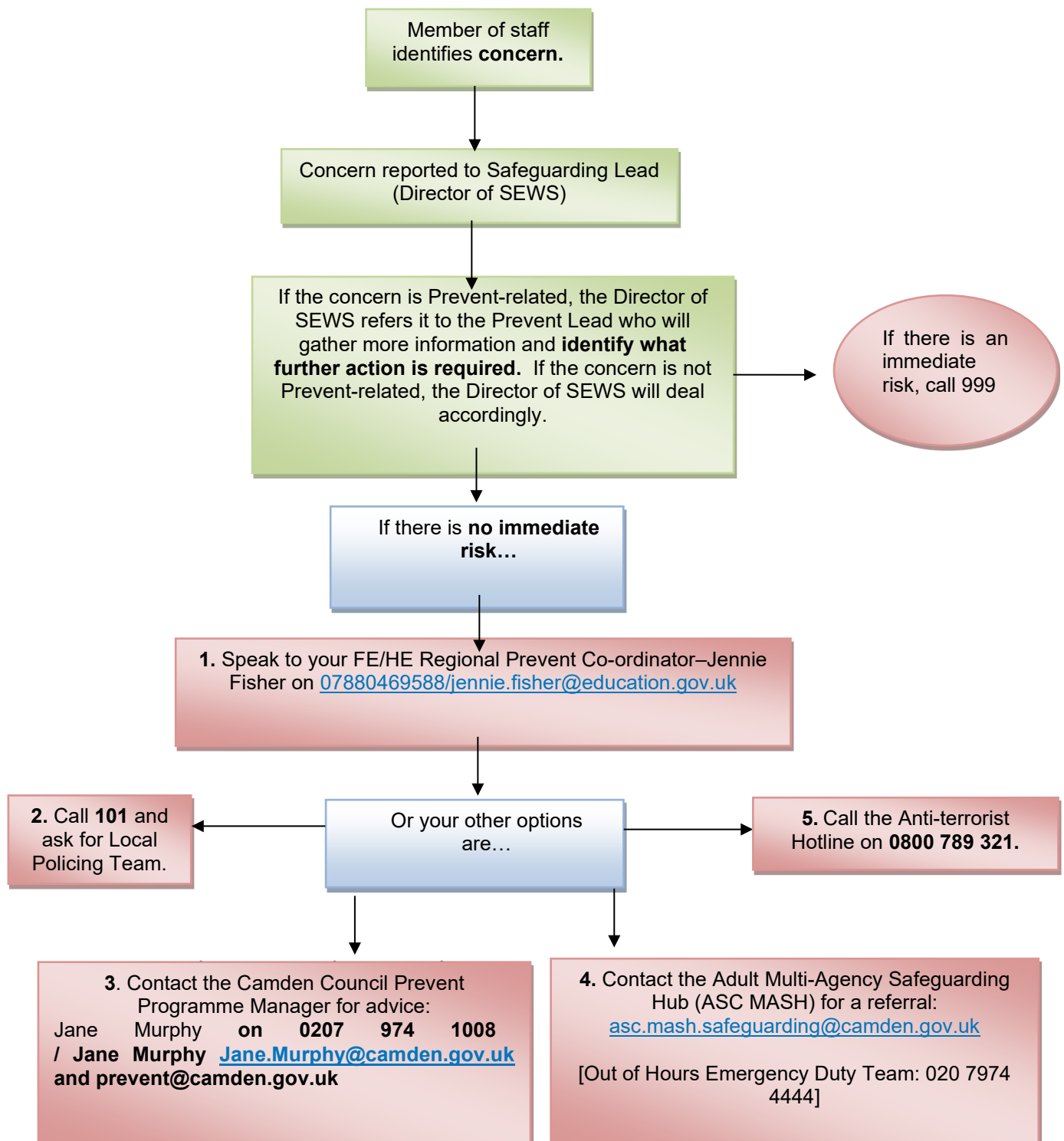
Name	
Signed	
Date	

CARE: This information is confidential and should only be shared on a “need to know basis” if it will protect the individual about whom the safeguarding concern has been expressed or if it will protect those around the aforementioned individual.

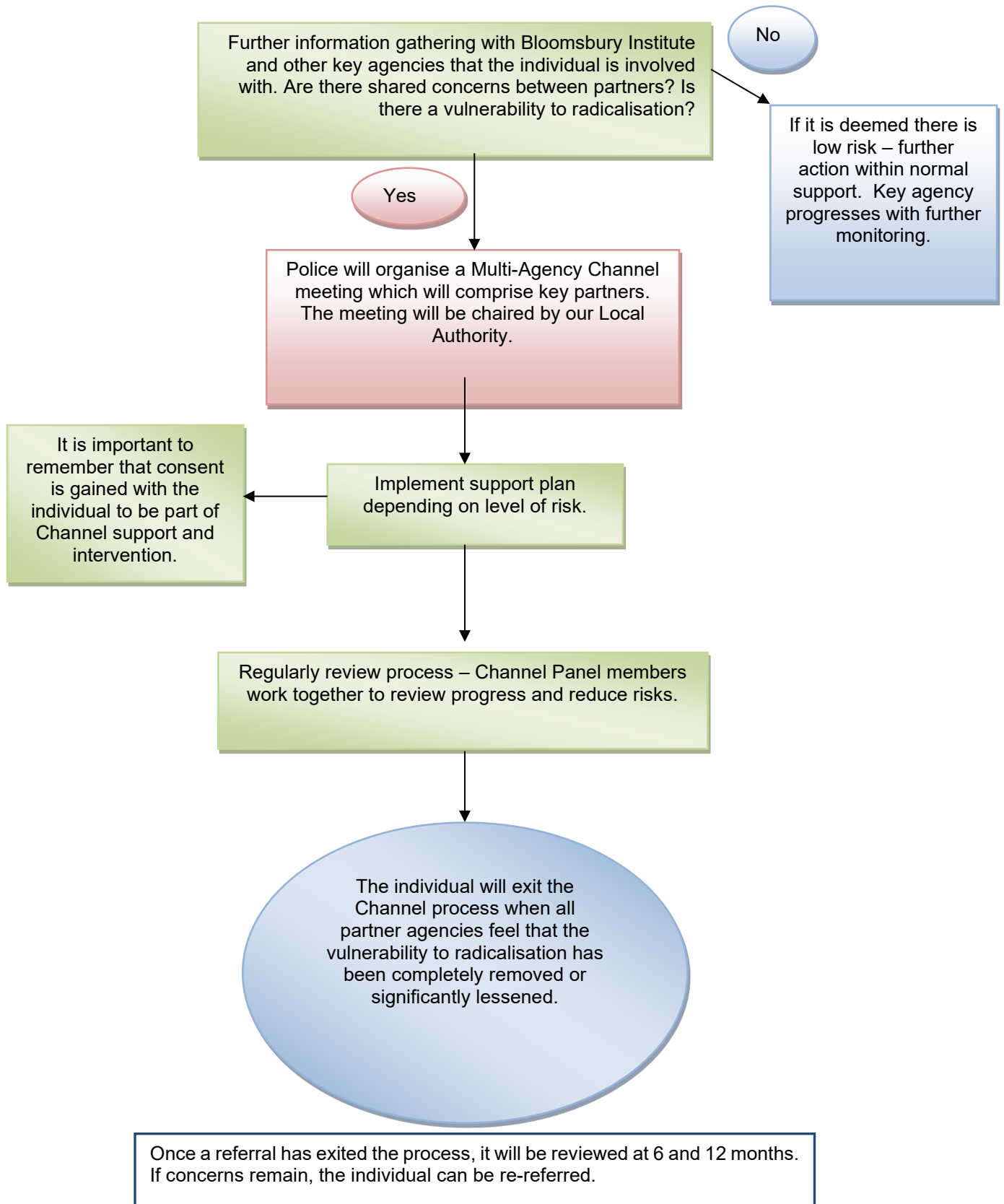
Appendix C: Prevent and Channel Referral Process

Process map for reporting a concern of a vulnerable individual

It is important for you as a member of staff to know where to go if you have a concern that someone may be on the route to radicalisation. Below is a flow chart which aims to show the process to be followed:



Once a referral has been made and enters the Channel process, the below process map illustrates what happens next...



Appendix D: Summary of Prevent responsibilities

Overall operational responsibility

Role Holder	Prevent Role
Prevent Lead	Prevent Lead with joint ultimate responsibility for Prevent.
Chief Operating Officer	Joint ultimate responsibility for Prevent.

Safeguarding

Role Holder	Prevent Role
Director of Centre for Student Engagement, Wellbeing and Success (SEWS)	Safeguarding Lead responsible for referring any Prevent-related concerns to the Prevent Lead.
Prevent Lead	Investigating and responding to any Prevent-related concerns.
Principal	Covers for the Director of SEWS in the latter's absence.
Chief Operating Officer	Covers for the Prevent Lead in the latter's absence.

External Speaker responsibilities

Role Holder	Prevent Role
Prevent Lead	Reviewing External Speaker Request Forms
Head of Compliance	Reviewing External Speaker Request Forms in the absence of the Prevent Lead.
Chief Operating Officer	Providing advice on any External Speaker Request Forms that the Prevent Lead or Head of Compliance might refer to them. A member of the External Speaker Appeal Panel.
Chief Operating Officer	Providing advice on any External Speaker Request Forms that the Prevent Lead or Head of Compliance might refer to them in the absence of the Chief Operating Officer .
Principal	A member of the External Speaker Appeal Panel.
Director of Centre for Student Engagement, Wellbeing and Success (SEWS)	A member of the External Speaker Appeal Panel.

Bloomsbury Radio

Role Holder	Prevent Role
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Learning Development and Community Engagement Manager	Responsible for undertaking and recording due diligence checks to ensure editorial decisions are consistent with our responsibilities in relation to the Prevent duty. Responsible for raising any concerns with the Institute's Prevent Lead.

Research

Role Holder	Prevent Role
Chair of the Research Ethics Committee (Principal)	To refer (where relevant) any research proposals that might require advice from the Prevent Lead.