Royal Conservatoire of Scotland

PREVENT Policy and Associated Procedures

Responsible RCS Officer/s	Academic Registrar & Secretary
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PREVENT: safeguarding from terrorism

1. PREAMABLE

Within higher education institutions, the term 'Prevent' refers to a legal duty under the Counter-Terrorism and Security Act (CTSA) 2015 and the UK Government's associated counter-terrorism strategy (known as CONTEST).

What is terrorism?
Terrorism is defined as:

> *"an act that endangers or causes serious violence to a person/people and/or damage to property; or seriously interferes with or disrupts an electronic system".*

There are various forms of terrorist activity ranging from 'lone actors' to organised groups. In addition to physical forms of attack, terrorists may also try to access information that may be of use to them, for example by infiltrating an organisation or securing the assistance of an "insider".

The violence described as terrorism normally has specific ideological causes. The ideological component of terrorism is what sets it apart from other acts of serious violence.

What is CONTEST?
CONTEST is the UK-wide counter-terrorism strategy. Its aim is to reduce the risk of terrorism in all the UK's communities as well as interests overseas. It is comprised of four pillars, of which one is Prevent. The four pillars are:

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

The Prevent duty with which we must comply is guided and assured by the Scottish Government in relationship with the UK Home Office. It emphasises the measures needed to safeguard students and/or staff who might be at risk of being drawn into terrorism. Prevent is about early intervention to protect people from the risk they may face before illegality relating to terrorism occurs. It is, therefore, a safeguarding measure. Pursue, protect, and prepare are legal responsibilities additional to the Prevent Duty.

This document, updates the Conservatoire's original PREVENT policy in the light guidance released by the government in May 2024.[1]

[1] The new governmental guidance replaces the 'Revised Prevent duty guidance: for Scotland, the 'Prevent duty guidance: for further education institutions in Scotland', and the 'Prevent duty guidance: for higher education institutions in Scotland' of 2015 (updated in April 2021).

Commitment to Academic Freedom and Freedom of Expression

To fulfil the Prevent duty, the Conservatoire takes a whole community approach and as a key part of its wider responsibility to the welfare of all members of its community; students, staff, temporary workers, visiting academics, and volunteers.

We also strive to balance concerns regarding radicalization and extremism with the rights of being an open, diverse community in which we protect freedom of speech and academic freedom [See Appendix 1: Understanding the freedom of speech and academic freedom rights] at the same time as ensuring the rights articulated within the Equalities Act 2010.

This requires us to navigate what is reasonable, unreasonable, and criminal behaviour in conflicts which might sit within academic freedom and/or freedom of expression. Key to understanding what is reasonable is whether behaviour crosses a **threshold.** In very simple terms, the threshold can be described as being a line which is crossed when behaviour moves from unintentionally stressful but, nonetheless, conflictual interactions with one another about a given topic to unreasonable (aggressive, coercive, prejudiced etc) interactions, and ultimately to criminal actions (violent or associated with physical violence).

However, each case normally needs to be threshold assessed, because within Prevent some apparently reasonable behaviour may indicate growing susceptibility to other forms of behaviour that the Conservatoire considers as below the standards it expects or potentially falling within the scope of its Prevent duty.

2. UNDERSTANDING THE DUTY

What is the PREVENT duty?

The aim of Prevent is to stop people from becoming terrorists or supporting terrorism. The objectives of Prevent are to:

- tackle the ideological causes of terrorism
- intervene early to support people susceptible to radicalisation
- enable people who have already engaged in terrorism to disengage and rehabilitate

Safeguarding from the perspective of counter-terrorism

The Prevent duty requires the Conservatoire to help prevent the risk of people becoming terrorists or supporting terrorism. It sits alongside our long-established safeguarding duties outlined in our Safeguarding policies and guidelines, all of which are designed to protect members of the RCS community from a range of other harms.

This policy aims to ensure that people who are susceptible to radicalisation are supported as they would be under safeguarding processes.

Principles

The general safeguarding principles underpin the Conservatoire's approach to the PREVENT duty:

- Compliant with the law
- Community oriented and individual accountability focused
- Respectful and fair in its treatment of all parties

- Consistent, sensitive, proportionate, and timely in all procedures
- Outcomes based on the balance of probabilities

Responsibilities
The responsibilities under PREVENT are the same as in a general safeguarding situation:

- **Responsibility to recognize and check** – is something happening about which you are uncertain or nervous; have you checked in with the person who is worrying you to see if they're aware they're giving cause for concern
- **Keep a record**
- **Report to the Prevent Lead** – you might want to do this before you do anything else.
- **Refer (if appropriate) to relevant external body** – the Prevent Lead is mainly responsible for referrals. However, if a criminal act is or has occurred you must report directly to the police.

When to use this policy
Any member of the RCS community should refer to this policy if they are concerned that someone is vulnerable to radicalization or that activities are occurring or likely to occur in association with the Conservatoire that might constitute extremist or radicalizing events.

When in doubt, check with the institution's **Prevent Lead**: Academic Registrar and Secretary or, if in relation to student conduct, the **Student Community Conduct Officer**.

3. PEOPLE AND GROUPS

As with all safeguarding, every member of the Conservatoire community is responsible for managing safeguarding under the Prevent duty. To manage the practicalities associated with the Prevent Duty, the Conservatoire uses the following approaches:

Risk Management Group
In line with our obligations under the law, the Conservatoire's **Risk Management Group** will maintain an oversight of the Conservatoire's response to the Prevent Duty. The members of this committee are:

- Principal
- Deputy Principal
- Director of External Relations
- Director, Drama, Dance, Production & Film
- Director, Music
- Director of Human Resources
- Director of Finance
- Director of Business Development
- Academic Registrar and Secretary
- A Lay Governor

Prevent Risk Group
The Prevent risk group is a sub-group of the Conservatoire's Risk Management Group and includes:

- Academic Registrar and Secretary

- Director of External Relations
- Relevant Designated Safeguarding Leads (as noted in the Safeguarding Policy) depending on nature of the concern and whether it relates to a staff or student member
  [Child and young adults: The Prevent duty applies to all levels of education. Consequently, the Prevent Policy should be read alongside the RCS Child Protection Policy in cases involving individuals or groups under the age of 18.]
- Student President
- Relevant Director (whose area the concern has arisen from)
- EDI Officer

Prior to any referral being made externally through the Prevent Duty, this group will be convened by the Prevent Lead.

Where a member of staff and/or a student raises concerns regarding the wellbeing of a member of the Conservatoire community, or the invitation of speakers, or the hosting of events that are perceived to have the potential to draw a student or a member of staff into terrorism, the Prevent Risk Group will provide advice and, ultimately, will make decisions on the Conservatoire's behalf as to the best course of action, taking account of all of the Conservatoire's statutory duties.

Designated Prevent Lead

The Academic Registrar and Secretary acts as the Conservatoire's Prevent Lead and is the institution's designated officer for all referrals under Prevent. Referrals are submitted using the Prevent national referral form for Scotland. In the absence of the Academic Registrar and Secretary, the Director of Finance and Estates can refer with respect to staff and the Student Community Conduct Officer can refer with respect to students.

The Prevent Lead:

1. Reports any Prevent issues to the Health, Safety and Wellbeing Committee and completes the annual report which progresses from Health, Safety and Welfare Committee to People & Culture Committee and Audit and Risk Committee.

2. Acts as the institutional contact with regards to:
   - Scotland's Higher Education Prevent Leads Group (Universities Scotland HE Prevent Working Group)
   - Local authority-led Prevent Multi-Agency Panels (PMAP)

3. Ensures that internal networks, including the Student's Union, are regularly and appropriately kept up-to-date with any key emerging issues or trends relevant to Prevent both in their sector and more generally.

4. Convenes the Conservatoire's Prevent Risk Group as necessary.

Training

All RCS staff should complete training provided by the Home Office:
https://www.gov.uk/guidance/prevent-duty-training

The Duty makes explicit that training is necessary to understand risk with regards to terrorism and as a result the Conservatoire expects that the **Prevent Lead, Prevent Risk Group member, & Designated Safeguarding Leads**, should engage with training at least **every two years**, enabling the lead to support other staff on Prevent matters and update them on relevant issues. This could include the trends in the annually published Prevent referral data for Scotland, relevant local or regional incidents, or new resources and training materials.

4. PROCEDURES

The Prevent Duty sets out the procedures for an institution to apply in the light of a potential risk that falls within Prevent.

What are the parts of a Prevent process?
The basic process is:

1. Concern is recognized by a member of staff, a student, or a member of the public about someone or an event connected to the Conservatoire that seems to fall within Prevent Duty parameters

2. Concern is reported to the Prevent Lead

3. Prevent Lead undertakes initial assessment of level of risk and convenes Prevent Risk Group (if necessary)

4. Prevent Risk Group determines gravity of the concern, whether it crosses a threshold, and directs (if necessary) Prevent Lead to submit a referral to Prevent Scotland using the National Referral Form

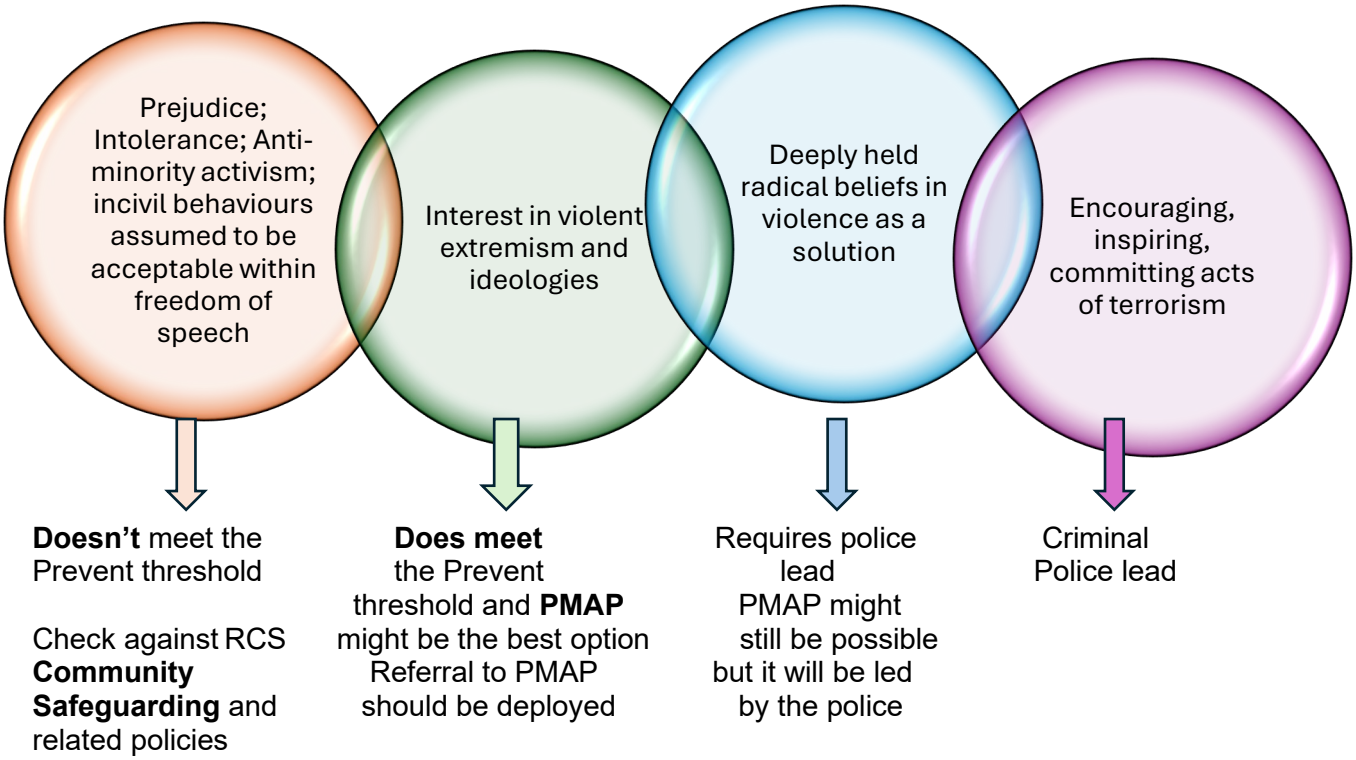
5. Once a referral is submitted to Prevent, it is assessed by specialist police officers in Police Scotland. These officers determine the next stages (details of which can be found in Prevent Duty Guidance paragraphs 57-74: Prevent duty guidance for specified authorities in Scotland - GOV.UK (www.gov.uk)

6. As part of the process, the Prevent Lead is expected to engage with Glasgow's Prevent Multi-Agency Partnership (PMAP). The PMAP is activated when a referral implies that an individual would be best served by early supportive intervention to which they must consent.

Any violent activity is criminal and should be reported directly to the police immediately.

What 'triggers' a PREVENT process?
The Prevent process is normally initiated because of either the recognition of an at-risk individual or group from within the staff or student body or the likelihood of an event happening or a speaker being invited to talk that pose a risk. Risk is assessed in terms of type, nature, and gravity of risk. External referral requires a threshold of concern to be crossed.

The Prevent Threshold: What is the threshold for referral?
The Prevent Risk Group establishes the threshold for referral, but a simple indicative portrayal of types of activity on which evaluation of the threshold is made is provided below:



Identification of a vulnerable or at-risk individual or group of individuals from amongst the RCS community:

1. A student or a member of staff recognises that someone within the Conservatoire community seems vulnerable to a shift into violent extremism;

2. This student or staff member contacts the Prevent Lead to raise concerns;

3. Depending on the nature of the concerns, the Prevent Lead will:
   (a) record the concern and/or
   (b) progress the case into either (1) Conservatoire community safeguarding processes or (2) Prevent Risk Group discussion

4. If (2), the Prevent Lead will convene the Prevent Risk Group

5. Prevent Risk Group will determine whether the case crosses the threshold for referral

6. Prevent Risk Group will direct Prevent Lead to submit the National Referral Form to Prevent Scotland.

7. Following a referral, the Conservatoire may be asked to:

- Provide any relevant information held on our systems about the individual or group referred
- Attend the PMAP meeting to discuss the individual case.

Management of speakers and events:
Recognition that a platform is being given to an individual or individuals who encourage radicalisation, extremism and terrorism or who are members of proscribed terrorist organisations. *(This procedure applies only to those events that fall within the scope of the Gateway process i.e. routine curricular activity is excluded from this procedure)*

The Conservatoire upholds the fundamental importance of freedom of speech and of artistic expression under the law. Within that context, the Conservatoire may require to place conditions on certain speakers or events where it is believed that there is an evidence-based and serious risk that the speaker or event will break the law; will pose a significant risk to the wellbeing of students, staff or visitors and/or will pose a significant reputational risk to the Conservatoire.

Under the Counter-Terrorism and Security Act 2015 (referred to as the Prevent Duty): encouragement of terrorism and inviting support for a proscribed terrorist organisation are both criminal offences. HEIs should not provide a platform for those offences to be committed.

The following process addresses the Prevent Duty in respect of speakers and events:

In assessing **productions/ performances**, the Gateway process should consider the following questions:	1. Will the production/performance promote a proscribed terror group or organization as designated by the UK Government or will such a group benefit in any way from the production/performance? See: https://www.gov.uk/government/publications/proscribed-terror-groups-or-organisations--2 (latest update April 2024) 2. Is the production/performance likely to draw people into terrorism? 3. Will the production/performance pose a reputational risk for the Conservatoire in the context of its Prevent Duty?
In assessing events that will involve **external speakers,** the Gateway process should consider the following questions:	1. Does the proposed speaker have links to, or represent, a proscribed terror group or organisation as designated by the UK Government? 2. Is the proposed speaker likely to draw people into terrorism? 3. Will hosting the event pose a reputational risk for the

	Conservatoire in the context of its Prevent Duty? 4. What is the focus of the event and might the subject matter or title be extremist or cause distress in the context of the Prevent Duty? Will both sides of the argument be represented? 5. Who will run the event and are they sufficiently experienced to ensure its smooth running? 6. Has the speaker any recent history of extremism as used in the context of the Prevent Duty, particularly at an HE institution? 7. What security provisions are proposed, and are they considered to be sufficient? 8. What materials will be available at the event (e.g. leaflets, DVDs, CDs, memory sticks)?

If, separately or cumulatively, the answers to any of the above questions give rise to concern, the matter should be referred to the Conservatoire's Prevent Risk Group via the Prevent Lead. The Prevent Risk Group will decide if any conditions should be attached to the event or, in extreme cases, whether the event should proceed.

Decisions regarding the cancellation of an event must take both Freedom of Speech and Academic Freedom into consideration as part of any risk assessment by the Prevent Risk Group.

Working with the Students' Union

As noted above, the President of the SU is a member of the Prevent Risk Group and should be present when it meets to consider a referral via the Gateway process and when the Group reviews the application of this Policy or considers amendments to it.

The Prevent Lead will seek the views of the SU on the application of this Policy so as to inform the Prevent Group's annual report to the Audit & Risk Committee and ensure that the SU is aware of the Prevent Duty and its own obligations in terms of that Duty.

Online Safety Policy

An Online Safety Policy that sets out how the Conservatoire promotes the safety of its staff and students when using the internet and recommends steps that users can employ to maintain their safety when using the internet and other technologies in the context of the Prevent Duty is published separately.

Research Ethics Policy

A Research Ethics Policy that sets out how research undertaken by either staff or students should

be considered for approval in the context of the Prevent Duty is published separately.

5. UNDERSTANDING VULNERABILITY

Prevent works at the **non-criminal** stage by using early intervention to encourage individuals and communities to challenge extremist and terrorist ideology and behaviour. Individuals who are assessed as being **vulnerable** to radicalisation can have multi-agency safeguarding plans put in place to ensure they get the necessary support.

Definitions

'Radicalisation' refers to the process by which a person comes to support terrorism and extremist ideologies associated with terrorist groups.

'Vulnerability' describes the condition of being capable of being injured; difficult to defend; open to moral or ideological attack. Within Prevent, the word describes factors and characteristics associated with being susceptible to radicalisation.

'Susceptibility' is the characteristics one might have which might make them more susceptible to being radicalised. This might include underlying vulnerabilities, but is also linked to their own agency.
Ie susceptibility through vulnerability may be a way of understanding a person's situation vis a vis radicalism but the individual is, nonetheless, still considered to have the agency to opt into extremist behaviour.

The following factors have been found to contribute to vulnerable people joining certain groups that support terrorist-related activity:

- Need to express or act on feelings of anger, grievance or injustice;
- Desire for excitement, comradeship or adventure;
- Fascination with violence, weapons and uniforms;
- Them-and-us thinking;
- Need for identity, meaning and belonging; and
- Need for status

6. UNDERSTANDING RADICALISATION

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There is no single profile of a person who is likely to become involved in terrorist-related activity, or single indicator of when a person might move to support extremism. Also, there is no universally accepted view of why individuals might become involved in such activities.

An increasing body of information indicates that factors thought to relate to personal experiences affect the way in which people relate to their personal environment and may make them vulnerable and susceptible to exploitation by those seeking to radicalise, potentially leading to their supporting terrorist activities.

Individuals who may be vulnerable and susceptible to radicalisation could be students or staff.

Recent case studies of incidents highlight that factors such as a negative change in a person's behaviour or circumstances may indicate increased vulnerability.

Radicalisation
Radicalisation is a process. It has no single route or pathway. It is generally more common for susceptible individuals to become involved in terrorist- related activity through the influence of others. Vulnerable individuals may be exploited in many ways by radicalisers who target their vulnerability.

Radicalisers often use a persuasive rationale or narrative and are usually charismatic individuals who are able to attract people to their cause based on a particular interpretation or distortion of history, politics or religion. Initial contact may be via:

- Peers, siblings, other family members or acquaintances with the process of radicalisation often being a social one;
- A range of unsupervised environments, such as gyms or cafés;
- In private in individual's homes; and
- The Internet and Social Media.

Contact with radicalisers is also variable and may be direct i.e. face-to-face, or indirect through the Internet, social networking or other forms of media. More commonly it will be through a combination of the above.

Use of extremist rationale or 'narrative'
Radicalisers usually attract people to their cause through a persuasive rationale contained within a single narrative that has the potential to influence views. Inspiring new recruits, embedding the beliefs of those with established extreme views and/or persuading others of the legitimacy of their cause is the primary objective of those who seek to radicalise vulnerable individuals.

Exploitation
The factors surrounding vulnerability are many and they are unique to each person:

- **Susceptibility to exploitation**
  In terms of personal vulnerability, various factors may make individuals susceptible to exploitation. None of these are conclusive in themselves, or exclusive of each other. Therefore, they should not be considered in isolation but in conjunction with the particular circumstances of the individual and any other signs of radicalisation.
- **Identity crisis**
  Young adults exploring issues of identity can feel distant from their parents/family, cultural and religious heritage and uncomfortable with their place in society around them. Radicalisers exploit this by providing a sense of purpose or feelings of belonging. Where this occurs, it can often manifest itself in a change in a person's behaviour, their circle of friends, the way they interact with others and the way they spend their time.
- **Personal crisis**
  This may for example, include significant tensions within the family that produce a sense of injustice within the vulnerable individual and alienation from what may have been the traditional or familiar certainties of family life.

APPENDIX 1: Freedom of Speech and Academic Freedom

Freedom of speech is not an absolute right, and it does not include the right for individuals to harass others or incite them to violence or terrorism.

The right to freedom of expression is secured by Article 10 of the European Convention on Human Rights (ECHR). Further guidance on ECHR can be found in Freedom of expression: a guide for higher education providers and students' unions in Scotland.

Freedom of expression is relevant to but should not be confused with the important principle of academic freedom. Academic freedom relates to the intellectual independence of academics in respect of their work, including the freedom to undertake research activities, express their views, organise conferences and determine course content without interference. In accordance with their duty under section 26 of the Further and Higher Education (Scotland) Act 2005, higher education establishments must aim to uphold the academic freedom of staff in their teaching and research so far as the higher education establishment considers reasonable.

Higher education establishments, as specified authorities, must have particular regard to the duty to ensure freedom of speech under Section 31 of the CTSA.

Document Revision History

Version No.	Version Date	Prepared By	Approved By	Summary	Date of next review
1	Aug 2016	Secretary	Academic Board	Prevent Policy in accordance with statutory duty under the Counter- Terrorism and Security Act 2015	August 2017
2	Nov 2018	Human Resources	N/A	Minor changes due to CSMT changes	August 2019
3	Sept 2023	Academic Registrar and Secretary	N/A	Minor changes due to CSMT changes & updated links	August 2024
4	May 2024	Academic Registrar and Secretary	To come to Board via HSWC, PCC	Major rewrite following new SG guidance: introduction of Prevent Risk Group; formalisation of the single point of contact (SPOC) as the Academic Registrar and Secretary (Prevent Lead). Additional appendix on freedom of speech and academic freedom.	August 2025