



Prevent Duty: Information Sharing Protocol

1. Introduction

- a. The S P Jain London School of Management has a statutory duty to have due regard to the need to prevent people from being drawn into terrorism. Under the Counter-Terrorism and Security Act 2015, the School may have to share information with external bodies on external speakers, or students to provide advice and support individuals who may be at risk of being drawn into terrorism. This protocol sets out how such situations will be managed.

2. Concerns about students who may be radicalised

- a. Staff who have concerns about their students should follow the Students at Risk guidance and report these to the Chief Operating Officer.
- b. Upon receipt of the concerns, Student Services will undertake a check as to whether there are other issues or concerns related to this student. The Prevent Group, which comprises the Dean, the Chief Operating Officer, the Registrar and the Head of Student Services, will then convene to consider such concerns. This group will decide what action to take, which could include the following:
 - i. No action required where it is considered there are insufficient grounds to believe that the individual is being drawn into terrorism and there are no other concerns;
 - ii. Agreement that the concerns are not Prevent related but referring the individual to another internal or external source;
 - iii. Inform the student that concerns have been raised and how to avoid the situation in future;
 - iv. Give the student advice about their social media profile where appropriate;
 - v. Ask the student to come to an interview to discuss the concerns;
 - vi. Contact the Prevent Co-Ordinator at the local authority or the Department of Education without giving personal details to gain further advice where it is considered that there may be issues related to extremism on a confidential basis;
 - vii. Refer the student to Channel¹ (with their consent).
 - viii. Refer the situation to the police if it is believed that a criminal offence has taken place.
- c. Students who have concerns about Prevent should contact the Chief Operating Officer who will refer the matter to the Prevent Group to investigate where appropriate.

3. Sharing information on external speakers and guest lecturers

¹ Channel is a multi-agency intervention programme designed to help those who are vulnerable to being drawn into extremism. A referral to Channel would be made on the advice of Prevent Coordinators.

- a. Approval of external speakers and guest lecturers should be considered through the Freedom of Speech Policy. Where concerns are raised about external speakers, these will be discussed by the Prevent Group. This group will decide what action to take as outlined in the events approval procedure outlined in the Policy.
- b. Where the School has concerns about an external speaker, it will contact the Prevent Coordinator at the local authority or DfE for advice on a confidential basis. It might also share information through local Prevent networks.

4. Legal basis for sharing

- a. The School will share personal and other data (name and contact details as well as relevant information related to the concern and purpose of the information sharing requirement).
- b. The legal basis for sharing the information specified above, is by virtue of section 26 of the Counter-Terrorism and Security Act 2015. The School is designated as 'specified authority' as defined in Schedule 6 of the Act.
- c. The School will also act within the boundaries of the Data Protection Act 2018.

5. Consent

- a. Wherever possible, the consent of the individual whose data are to be shared will be sought prior to the transfer of data unless where there are concerns relating to the School's safeguarding duties or where this could be considered counterproductive. Each case will be considered on its own merits and the final decision will be taken by the Institutional Lead for Prevent.

6. Records management

- a. A record of each sharing event, to include the date, the name of the organisation with which the data have been shared, and details of the transaction will be securely retained by the School Prevent Coordinator for six years after the date on which the information was shared.

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