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GBS Prevent Duty

Global Banking School

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V1.0	February 2024	25-02-2024	1. The title has changed to GBS Prevent Duty, as an additional document to the Safeguarding Policy 2. What Prevent means at GBS 3. Guidance on reporting a concern and referral process	Loretta Miller, Head of Student Wellbeing & Safeguarding
V2.0	July 2026	01-08-2026	1. Minor edit made to the policy in the light of the new policy template	Loretta Miller, Head of Student Wellbeing & Safeguarding

Related GBS policies

- GBS Safeguarding Policy
- GBS Data Protection Policy
- GBS Equality and Diversity Policy
- GBS Anti-Harassment and Anti-Bullying Policy
- GBS Student Disciplinary Policy and Procedure
- GBS Staff Disciplinary Policy
- GBS Email Usage Policy
- GBS Social Media Policy
- GBS ICT Policy
- GBS IT Security Policy
- GBS Student Charter
- GBS Student Code of Conduct

External Reference Points

1. Information Commissioner's Office, Accessed online at: <https://ico.org.uk/>
2. UK Public General Acts, *Data Protection Act 2018*, Accessed online at: <https://www.legislation.gov.uk/ukpga/2018/12/contents/enacted>
3. UK Public General Acts, *Computer Misuse Act 1990*, Accessed online at: <https://www.legislation.gov.uk/ukpga/1990/18/contents>
4. UK Public General Acts, *Terrorism Act 2000*, Accessed online at: <https://www.legislation.gov.uk/ukpga/2000/11/contents>
5. UK Public General Acts, *Counter-Terrorism and Security Act 2015*, Accessed online at: <https://www.legislation.gov.uk/ukpga/2015/6/section/26>
6. GOV.UK Statutory Guidance, *Prevent duty guidance*, Accessed online at: <https://www.gov.uk/government/publications/prevent-duty-guidance>
7. UK Public General Acts, *The Telecommunications (Lawful Business Practice) (Interception of Communications) Regulations 2000*, Accessed online at: <https://www.legislation.gov.uk/uksi/2000/2699/contents/made>

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1. Policy Statement

1.1 GBS is committed to safeguarding and promoting the welfare of its students and staff. In line with its responsibilities under the Counterterrorism and Security Act 2015 and the UK Government's Prevent Duty, GBS takes appropriate steps to help prevent individuals from being drawn into terrorism or extremist activity. The institution is dedicated to creating a safe, inclusive, and supportive environment in which concerns can be identified, addressed, and reported through established safeguarding procedures.

2. Purpose

2.1 The purpose of this Prevent Duty Policy is to ensure that GBS fulfils its statutory responsibilities under the **Counter-Terrorism and Security Act 2015** and the UK Government's **Prevent Duty**. The policy provides a framework for identifying, assessing, and responding to concerns that individuals may be vulnerable to radicalisation or being drawn into terrorism. It aims to safeguard students, staff, and visitors by promoting awareness, fostering an inclusive and respectful learning environment, and ensuring appropriate support and referral mechanisms are in place. The policy also supports compliance with legal and regulatory requirements while upholding fundamental rights, freedoms, and equality of opportunity.

2.2 As a Relevant Higher Education Body (RHEB), GBS is required to comply with the statutory Prevent duty set out in Section 26 of the **Counter-Terrorism and Security Act 2015**, which places a duty on specified authorities to "have due regard to the need to prevent people from being drawn into terrorism." In fulfilling this obligation, GBS seeks to identify and respond appropriately to concerns regarding vulnerability to radicalisation, while ensuring that freedom of speech, academic freedom, equality, diversity, and individual rights are respected and protected.

2.3 The Prevent duty requires GBS to give due regard to the need to prevent people from being drawn into terrorism. As stated in the UK Government's Prevent Duty guidance for higher education providers, the term *due regard* means that authorities should place an appropriate level of importance on the need to prevent individuals from being drawn into terrorism when considering all other factors relevant to the exercise of their

functions. In practice, this means that GBS will take proportionate and risk-based steps to identify and address concerns relating to radicalisation and extremism, while balancing its wider responsibilities, including safeguarding, equality, diversity and inclusion, freedom of speech, academic freedom, and the welfare of students and staff.

3. Scope

3.1 This Prevent Duty Policy applies to all members of the GBS community and covers all activities undertaken by or on behalf of GBS.

3.2 The policy applies to:

- All students, including undergraduate, postgraduate, part-time, full-time, and apprenticeship students.
- All employees, including permanent, temporary, agency, and contract staff
- Visiting lecturers, guest speakers, consultants, contractors, volunteers, and placement providers engaged by GBS.
- Individuals and organisations using GBS premises, facilities, systems, or resources.
- All GBS campuses, online learning environments, and activities conducted under the guidance of GBS

3.3 The policy applies to all aspects of the institution's operations, including teaching and learning, student support services, wellbeing and safeguarding activities, external speaker events, partnerships, research activities, information technology systems, and campus facilities management.

3.4 GBS expects all individuals covered by this policy to comply with its requirements and to contribute to maintaining a safe, inclusive, and respectful environment that is resilient to the risks of radicalisation, extremism, and terrorism.

3.5 Any concerns relating to potential radicalisation or extremist activity should be reported through the appropriate safeguarding and reporting procedures.

4. Definitions

4.1 For the purposes of this Policy, the following definitions apply:

- Prevent Duty
- Terrorism
- Radicalisation
- Extremism
- Safeguarding

- Vulnerability
- Relevant Higher Education Body (RHEB)

4.2 Prevent Duty: The statutory duty placed on specified authorities, including Relevant Higher Education Bodies (RHEBs), under the Counterterrorism and Security Act 2015 to have due regard to the need to prevent people from being drawn into terrorism.

4.3 Terrorism: The use or threat of action designed to influence the government, intimidate the public, or advance a political, religious, racial, or ideological cause, where the action involves serious violence, damage to property, endangers life, creates a serious risk to public safety, or is intended to disrupt electronic systems.

4.4 Radicalisation: The process by which an individual comes to support, adopt, or be persuaded by extremist ideologies, beliefs, or causes that may lead to involvement in terrorism or terrorist-related activities.

4.5 Extremism: The vocal or active opposition to fundamental values, including democracy, the rule of law, individual liberty, and mutual respect and tolerance of different faiths and beliefs. Extremism can take many forms, including political, religious, ideological, or single-issue extremism.

4.6 Safeguarding: The actions taken to protect the health, wellbeing, and human rights of individuals and to enable them to live free from harm, abuse, neglect, exploitation, radicalisation, or other forms of vulnerability.

4.7 Vulnerability: A condition or set of circumstances that may make an individual more susceptible to radicalisation or exploitation by extremist individuals or groups. Vulnerability may arise from personal, social, emotional, psychological, or environmental factors.

4.8 Relevant Higher Education Body (RHEB): A higher education provider that is subject to the Prevent duty requirements under the Counterterrorism and Security Act 2015 and associated statutory guidance.

5. Principles

5.1 GBS is committed to implementing the Prevent Duty in a proportionate, risk-based, and safeguarding-focused manner. The following principles underpin GBS approach to preventing people from being drawn into terrorism or extremist activity. GBS is committed to regularly reviewing its Prevent arrangements, policies, procedures, training, and risk assessments to ensure ongoing compliance with statutory requirements and the adoption of good practice

5.2 Safeguarding First

GBS recognises that vulnerability to radicalisation is a safeguarding issue. Concerns relating to radicalisation, extremism, or terrorism will be managed through established safeguarding procedures, with the wellbeing of the individual being the primary consideration.

5.3 Early Identification

GBS is committed to identifying concerns at an early stage and providing appropriate support to individuals who may be vulnerable to radicalisation. Early intervention helps reduce risk and ensures that support is provided before concerns escalate.

5.4 Respect for Freedom of Speech and Academic Freedom

GBS is committed to protecting lawful freedom of speech and academic freedom. We encourage open discussion, critical thinking, and the exchange of diverse viewpoints while ensuring that activities remain within the law and do not promote or encourage terrorism or unlawful extremist activity.

5.5 Equality, Diversity and Inclusion

GBS promotes an inclusive environment that values diversity, mutual respect, and tolerance. The Prevent Duty will be implemented fairly and without discrimination on the grounds of race, religion or belief, ethnicity, nationality, gender, sexual orientation, disability, age, or any other protected characteristic.

5.6 Shared Responsibility

Safeguarding against radicalisation and extremism is a shared responsibility. All students, staff, contractors, visitors, and partners are expected to contribute to maintaining a safe and respectful environment and to report concerns to safeguarding@globalbanking.ac.uk

5.7 Partnership Working

GBS will work collaboratively with relevant external agencies, including Safeguarding Partners, Local Authorities, Police, and Channel Panels where appropriate, to support individuals and manage risks effectively.

5.8 Confidentiality and Information Sharing

Information relating to Prevent concerns will be handled sensitively and in accordance with applicable data protection, safeguarding, and confidentiality requirements. Information will be shared only where necessary, lawful, and proportionate to protect individuals or the wider community.

5.9 Promoting a Safe Environment

GBS seeks to create a learning and working environment where individuals feel safe, respected, and able to express their views lawfully. Through education, awareness, support, and engagement, GBS aims to build resilience to extremist influences and promote positive community relations.

6. Roles and Responsibilities

6.1 GBS recognises that effective implementation of the Prevent Duty requires a coordinated approach across the institution. All members of the GBS community have a role to play in safeguarding individuals from the risks of radicalisation and terrorism.

6.2 The Head of Student Wellbeing is the GBS Designated Officer for Prevent, responsible for coordinating GBS's compliance with Prevent Duty requirements. The Prevent Officer is responsible for:

- Providing operational leadership for Prevent-related concerns.
- Receiving, assessing, and managing referrals relating to radicalisation or extremism
- Maintaining appropriate records of concerns, actions, and outcomes
- Liaising with external agencies, including local safeguarding partners, police, and Channel panels where appropriate.
- Ensuring that Prevent procedures are implemented effectively across GBS.
- Providing advice and support to staff and students on Safeguarding and Prevent matters.
- Coordinating GBS's compliance with Prevent Duty requirements.
- Development and delivery of Prevent awareness training.
- Monitoring developments in legislation, guidance, and best practice.

6.3 GBS Prevent Working Group are responsible for monitoring all Prevent-related policies and procedures. The GBS Prevent Working Group is chaired jointly by the Deputy CEO (Prevent Lead) and the Dean of Students. Membership includes the Head of Student Wellbeing, Safeguarding Coordinator, Campus Safeguarding and Prevent Officers, Health & Safety Manager, Regional Facilities Manager, and the Student Complaints & Compliance Manager.

6.4 The Safeguarding Coordinator supports the implementation of the Prevent Duty by assisting with the management of safeguarding and Prevent-related referrals and the administration of External Speaker applications. The Safeguarding Coordinator is responsible for ensuring that relevant information is accurately recorded, maintained

securely, and shared with appropriate personnel in accordance with data protection and safeguarding requirements. They will also ensure that concerns are escalated promptly to the Prevent Officer, or other relevant authorities where necessary. Additionally, the Safeguarding Coordinator provides administrative support for safeguarding processes, monitoring actions and outcomes to help ensure effective case management and compliance with GBS procedures.

6.5 Each campus has an allocated Safeguarding & Prevent Officer who reports to the Safeguarding Coordinator. Safeguarding & Prevent Officers are designated members of staff who act as local points of contact for safeguarding and Prevent-related concerns within their respective campuses.

6.6 Managers, Heads of Department, and Academic Leaders are responsible for:

- Promoting awareness of the Prevent Duty within their area of responsibility
- Ensuring that staff complete mandatory safeguarding and Prevent training.
- Supporting staff in identifying and responding appropriately to concerns.
- Escalating Safeguarding and Prevent concerns in accordance with GBS reporting procedures to safeguarding@globalbanking.ac.uk .

6.7 All employees, including academic and professional services staff, are responsible for:

- Understanding their safeguarding and Prevent responsibilities.
- Completing required safeguarding and Prevent training.
- Remaining alert to signs of vulnerability, radicalisation, or extremist influences.
- Reporting concerns promptly through the appropriate channels.
- Supporting an inclusive environment that encourages respectful debate and challenges discrimination, hatred, and intolerance.
- Respecting freedom of speech and academic freedom within the boundaries of the law and institutional policies.

6.8 Students are expected to:

- Conduct themselves in a manner consistent with GBS values and policies.
- Respect the rights, beliefs, and opinions of others.
- Engage responsibly in discussions and activities.
- Report concerns about safeguarding, extremist behaviour, or radicalisation to safeguarding@globalbanking.ac.uk .
- Support a safe, inclusive, and respectful learning environment

6.9 External speakers, visitors, contractors, and partner organisations are expected to:

- Comply with relevant GBS policies and procedures when engaging with the institution.
- Respect the legal framework governing freedom of speech, equality, and safeguarding.
- Refrain from promoting extremist views that could encourage terrorism, hatred, violence, or unlawful activity.
- Cooperate with any due diligence or risk assessment processes required by GBS

6.10 Everyone associated with GBS shares responsibility for maintaining a safe and supportive environment. Any concerns relating to radicalisation, extremism, terrorism, or vulnerabilities that may place an individual at risk should be reported promptly to safeguarding@globalbanking.ac.uk , to enable appropriate assessment, support, and intervention.

6.11 Fundamental British Values are the values identified by the UK Government as:

- Democracy
- The rule of law
- Individual liberty
- Mutual respect
- Tolerance of those with different faiths and beliefs

These values underpin the Prevent Duty and support the creation of a safe, inclusive, and respectful learning environment.

7. Policy Amendment and Administration

7.1 This policy may be amended by GBS at any time. If there are any queries relating to policy administration, please contact the Academic Standards and Quality Office at asqo@globalbanking.ac.uk.

8. Data Protection and Confidentiality

8.1 GBS is registered with the Information Commissioner's Office as a Data Controller. Details of the School's registration are published on the [Information Commissioner's website](#). GBS as a Data Controller implements appropriate technical and organisational measures to ensure that processing of personal information is performed in accordance with the UK General Data Protection Regulations (UK GDPR) and under the Data Protection Act 2018 (DPA).

9. Alternative Format

9.1 This policy can be provided in alternative formats (including large print, audio and electronic) upon request. For further information, or to make a request, please contact the Academic Standards and Quality Office at asqo@globalbanking.ac.uk.