Policy on staff of concern
Including policy on information sharing

This policy applies to staff who exhibit behaviours or actions which give cause for concern
about a vulnerability to extremism or radicalisation and sets out interventions the College
may make in the interest of the safety and well-being of the individual and the wider
College community and society as a whole.

In accordance with the RCM’s obligation to comply with the Counter Terrorism and Security Act
2015 if any member of staff is identified as potentially vulnerable to radicalisation or extremism,
any or all of the following actions may be taken:
 Information regarding an individual’s actions or behaviour which are causing concern in this
regard may be the subject of a confidential case conference called by the Deputy Director or
appointed representative and other staff members as appropriate
 information about the individual’s actions or behaviour may be shared, initially anonymously,
with the BIS Prevent Coordinators to seek advice and determine next steps
 where deemed appropriate, the College will attempt to seek consent from the individual to
share information, including their identity and other data held by RCM, with the BIS Prevent
Coordinators, and/or lead at Westminster District Prevent Board and Monitoring Authority
 if it is not feasible to gain the individual’s consent, the College, working with the advice and
support of the Westminster District Prevent Board and Monitoring Authority may decide that
there are sufficient grounds for concern, and will share information about that individual
accordingly
 decisions about information sharing will be taken collectively by the case conference. The final
decision rests with the Deputy Director (or substituting senior member of staff) advised by the
case conference members. This policy is deliberately general in order to be flexible in dealing
with what are likely to be complex individual circumstances that may take several escalating
steps to address and where issues of extremism may not be apparent at the outset. If staff
disciplinary issues arise in considering an issue of extremism, then the staff disciplinary
procedure will be used.
As a result of this process