



Prevent Policy

2019/2020

1. This policy has been drawn up and implemented in order to satisfy the Government and regulators such as OFS that the College is fulfilling its duty under the Counterterrorism and Security Act 2015 (the Act) to have due regard to the need to prevent people being drawn into terrorism (the Prevent duty).
2. The College affirms and promotes education as a place of life-enhancing free expression and enquiry. It deplores the expression and cultivation of views and actions which tend to limit or destroy the life of others, however intense or sincere such views or actions may be.
3. The College regards itself and will sustain itself as a locus of democracy, ethical and rigorous enquiry, social and individual improvement, due process, peace, individual liberty, respect and tolerance.
4. The College recognises the UK government view that preventing people being drawn into terrorism requires challenging extremist ideologies. This document is drawn up following the current UK official definition of extremism as 'vocal or active opposition to fundamental British values, including democracy, the rule of law, individual liberty and mutual respect, and tolerance of different faiths and beliefs'. The College affirms and promotes the Fundamental British Values, which underpin what is to be a responsible citizen in a diverse Great Britain. The College promotes respect for democratic processes and tolerance of different faiths and respect for how the law is made and applied in the UK, support for equality of opportunity for all and liberty to know, understand and exercise the rights and personal freedoms.
5. College members, and UK citizens more generally, do not have the right not to be offended by the views of others, but they all have the right not to be subject to the threat or acts of terrorism. The College will accordingly operate its Prevent duties with energy and diligence.
6. All other policies and procedures of the College (e. Equal opportunities, anti-bullying and harassment) should be understood as implicitly if not explicitly embodying and operationalising the Prevent duty.
7. College's implementation of this Prevent Policy must not involve covert activity.

8. Themes to be considered in implementation include necessity and proportionality; consent; the General Data Protection Regulation (**GDPR**), and the Human Rights Act 1998.

9. The College will provide OFS and any other relevant regulator with any information required for monitoring compliance with the Prevent duty.

10. The College will work to the reporting requirements and submission dates set by OFS or any successor body.

11. This policy is linked to the two sets of statutory guidance:

- Revised Prevent Duty Guidance for England and Wales (which includes general guidance for bodies in all sectors covered by the duty)
- Prevent Duty Guidance: for higher education institutions in England and Wales.

12. The College acknowledges that a key element of the UK government's Prevent strategy is to encourage institutions to address risks of radicalisation. The Counterterrorism and Security Act 2015 (the Act) introduced a package of measures aimed at countering the risk of terrorism and radicalisation. Part 5 of the Act puts hitherto voluntary elements of the Prevent strategy onto a statutory footing. The College became subject to the Prevent duty on 18 September 2015.

13. The College will respect the freedom of speech duty implicitly applying within higher education. It will respect the importance of academic freedom when issuing guidance. It will implement the two sets of UK government guidance:

- Revised Prevent Duty Guidance: for England and Wales (which includes general guidance for bodies in all sectors covered by the duty) – the 'General Guidance'
- Prevent Duty Guidance: for higher education institutions in England and Wales – the 'HE Guidance'.

14. The College will assess the level of risk that College members may be drawn into terrorism, and it will have policies and procedure to mitigate those risks. Partners of the College will need to be acknowledged in its risk assessments in a proportionate way.

The College has taken into account the OFS advice note at The College will maintain:

https://www.officeforstudents.org.uk/media/3e9aa5d3-21de-4b24-ac21-18de19b041dc/ofs2018_35.pdf

- i. **Prevent risk assessment**
- ii. **Action plan**
- iii. **Policies and procedures** for managing and mitigating the risks around external speakers and events on campus and institution-branded events taking place off campus. Such policies will reflect the institution's duty to ensure freedom of speech on campus and its arrangements to protect the importance of academic freedom.

15. The College will pay particular attention to:

- I. Senior management and governance oversight of the implementation of its Prevent duty obligations and engagement with Prevent partners.
- II. Engaging with and consulting students on the institution's plans for implementing the Prevent duty.
- III. Training appropriate staff about Prevent.
- IV. Sharing information internally and externally about vulnerable individuals.
- V. Sharing information about external speakers with other institutions, where legal and desirable.
- VI. Ensuring sufficient pastoral support for all students (including arrangements for managing prayer and faith facilities).
- VII. The use of the institution's computer facilities (hardware, software, networks, social media), to include consideration of filtering arrangements and of academic activities that might require online access to sensitive or extremism-related material.
- VIII. Engaging with student organisations, which are not subject to the Prevent duty, but are expected to cooperate with the College.
- IX. The UK 'Channel' programme. ('Channel' is an early-intervention, multi-agency process designed to safeguard vulnerable people from being drawn into violent extremist or terrorist behaviour. Channel panels chaired by local authorities bring together multi-agency partners to collectively assess the risk for an individual and can decide whether a support package is needed.)

16. The College will attend to:

a. An **annual report from the governing body or proprietor** on the implementation of the Prevent duty in the previous operation or academic year, including any significant developments up to the date of the report.

b. **Regulatory body assessment on a multi-year cycle.**

17. Any serious incident in the Prevent area will lead the College to review its approach to the Prevent duty: risk assessment, action plans, training, management and governance oversight.

18. The College will inform OFS, or any successor body, of any serious adverse event or serious reportable incident in the Prevent area. The College recognises that reporting an incident to OFS is not a substitute for reporting it to the police or other appropriate authority – for example, if criminality is suspected.

19. External speakers and events on campus will be subject to approval by the Principal, and will not go ahead if the risks cannot be fully mitigated. Information about the speakers will be shared with other institutions where appropriate and legal.

20. Senior management will engage with partners, including the police, the Prevent coordinators, and students.

21. Risk assessment will consider how and where students might be drawn into terrorism (including violent and non-violent extremism). It will consider whether student, staff welfare and other similar policies cover these issues. The College will scrutinise whether policies and procedures for events held by staff, students and third parties are effective.

22. The Prevent action plan will mitigate identified risks.

23. For the sharing of information about vulnerable people the internal mechanism is immediate report to the Principal. External agreements for the sharing of information about vulnerable people will be drawn up and operated. The default position of the College is that, within the ambit of legislation concerning disclosures, the nodal point for the transfer of information on Prevent themes is the Principal.

24. In the context of Prevent duties, the College will apply its welfare policies and procedures and its general preference for open-door consultation.

25. The College set aside a room for prayer, meditation or general thoughtfulness, it upholds the principle that the room should be equally available to those of any or no faith, including for the storage of religious books and other articles. At the same time, it acknowledges that some faiths favour certain days, times and practices, and it asks and expects other members of the College to respect such preferences. Any competition for or dispute over the use of such room shall be immediately referred to the Principal, whose decision will immediately apply, pending

any further discussion within the formal College processes. The College upholds the principle of transparency in its academic and social life: no person of another or no faith will be excluded at any time from room set aside for prayer, meditation or general thoughtfulness.

26. Operating that part of the UK tradition which represents tolerance and openness, the College respects the right of College members to express the religious beliefs. However, the expression of belief must not breach UK law, must not amount to bullying or harassment, and should respect the right of other College members to study and learn what they wish and how they wish within the law and within the conventions of UK higher education. Given their position of authority and influence, College staff is required to be particularly careful in their expression of belief of any kind; the expression of political/ religious faith, either personal or that of others, within the academic setting requires intensive care.

27. No part of the College's estate or equipment may be used for illegal purposes. The College will keep records of student attendance, performance, library use, and use of College IT and other electronic equipment.

28. The College may choose to designate certain web sites as 'privileged', meaning that they may be accessed on the College premises and/or using College equipment only with the written permission of the Principal after formal written application by the student/staff member. Permission to use such web sites will normally be given only where the applicant has made a good case that access is required for the purposes of research or other forms of scholarly activity. The College will publish a list of such 'privileged' web sites. The general policy of the College is that, on College premises and/or using College equipment, College members should not access without formal permission of the Principal any web site, whether designated or not as 'privileged', which may reasonably be considered to be promoting terrorism or promoting any other illegal activity or displaying security-sensitive materials. The College may choose to install automatic IT filtering arrangements.

29. Student groups and societies may meet on-campus for social and academic purposes with the written permission of the Principal. All such meetings must be arranged with the issue of an invitation to attend as observer for the Principal or the Principal's representative(s). No meeting shall be held which may reasonably be considered to be promoting terrorism or extremism (as defined in this document) or promoting any illegal activity or any other activity contrary to college rules. The Principal may refuse permission for a meeting.

30. Any external speaker invited to the College or to College activities by staff or student must be approved in advance by the Principal. Application, with a description of the intended

guest, must reach the Principal at least two weeks before the intended visit. The Principal may refuse permission for the inclusion of the intended guest.

31. The use of non-College bodies of College premises and/or equipment for events and/or activities are subject to the requirements of the two immediately preceding paragraphs.

32. The use by College-based groups of external premises and/or equipment for events and/or activities is subject to the requirements of the three immediately preceding paragraphs.

33. The College will evaluate its performance of this policy on an annual basis.