

## Prevent Duty and Policy

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### Introduction

- 1.1 The College is aware of its responsibilities to have due regard to the need to prevent people from being drawn into terrorism, placing a proportionate amount of consideration on its policies and procedures. There is a statutory imperative that we set out the measures we will take in accordance with provisions in the Counter-Terrorism Act 2015 as they apply to higher education providers.
  - 1.2 Encouragement of terrorism and/or soliciting support for a proscribed organisation is a criminal offence. Our Prevent Policy sets out our approach to the specific elements and provisions of the Act as they apply to higher education providers, as well as our more general approach to issues around the vulnerability of our staff and students with regard to harassment or radicalisation from any source, and relevant measures which enable our students to learn in safe and intellectually stimulating environments.
  - 1.3 In implementing this duty, we are also conscious of our commitments to free speech, academic freedom, human and equal rights, and the appropriate management of information.
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### Applicability

- 2.1 This policy relates to all staff, students, visitors to the College (including virtually) and those engaged in business on behalf of the College.
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### Leadership, Roles, and Responsibilities

- 3.1. The College takes seriously, at the highest levels, the need to prevent terrorism occurring in our community. Our policy has been approved by our Board.
  - 3.2. The Senior Executive is responsible for providing the Board with assurance of the College's compliance with the Prevent Duty. The Board is responsible for approving the Prevent Policy and for approving the College's annual accountability and monitoring return to the Office for Students.
  - 3.3. The Senior Executive will report the Prevent Risk Assessment and Action plan to the Audit, Risk and Compliance Committee, on delegated authority from the Board.
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- 3.4. The Chief Operations Director has been identified as the member of the executive responsible for ensuring that the College complies appropriately with the Prevent Duty, in liaison with the DfE Prevent Regional HE/FE Co-ordinator (Northwest) and other key stakeholders within and beyond the College.
- 3.5. All members of staff and members of the academic faculty should be aware of the College’s responsibilities under the Prevent Duty, the measures set out in this policy and comply with them. Members of the College’s community who are concerned about a student or member of staff who might be at risk of being drawn into terrorism should report this to the Prevent Lead. See information until Reporting and Referrals.
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## Definitions

- 4.1 Extremism: “the vocal or active opposition to British values, including democracy, the rule of law, individual liberty and mutual respect and tolerance of different faiths and beliefs. We also include in our definition of extremism calls for the death of members of our armed forces, whether in this country or overseas” (Report of Government Task Force on Extremism).
- 4.2 Radicalisation: “this refers to the process by which a person comes to support terrorism and forms of extremism leading to terrorism. A radicaliser is an individual who encourages others to develop or adopt beliefs and views supportive of terrorism and forms of extremism leading to terrorism” (Prevent Strategy).
- 4.3 Terrorism: an action that endangers or causes serious violence to a person/people; causes serious damage to property; or seriously interferes or disrupts an electronic system. The use or threat must be designed to influence the government or to intimidate the public and is made for the purpose of advancing a political, religious or ideological cause.
- 4.4 Vulnerability: a vulnerable adult is someone aged 18 or over, who is, or may be:
- 4.4.1 in need of community services due to age, illness or a mental or physical disability.
  - 4.4.2 unable to take care of themselves, or unable to protect themselves against significant harm or exploitation (Dept of Health 2002).
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## Risk Assessment and Action Plan

- 5.1 The College recognises the risk that College students or staff may be targets for radicalisation and has a Prevent Risk Assessment and Action Plan in place to manage the risks.
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5.2 The College assesses the current risk to be relatively low, in comparison with the Higher Education sector as a whole due to a number of factors, including:

5.2.1 the nature of the provision at the College; all Postgraduate level courses and vocational in nature; and

5.2.2 the delivery of teaching and learning at the College being managed wholly online and in a controlled Learning Management System.

5.3 Nonetheless, the College recognises that there is always a risk that College students or staff may be targets for radicalisation.

5.4 The Prevent Risk Assessment and Action Plan is managed through the College's overarching Risk Register and has input from the highest level of management at the College.

5.5 Day-to-day management of the Risk Assessment and Action plan is managed by the Chief Operations Director and the Registrar. The Risk Assessment and Action Plan is reviewed at the Audit Risk and Compliance Committee (ARCC) at least 4 times per year. A report from the ARCC Chair is provided to the College Board.

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**Working in  
Partnership**

6.1 The College places emphasis on working in partnership with external bodies and agencies to ensure we can provide a safe environment and to share information and best practice.

6.2 The College is active in the Northwest Regional Prevent Group to share and receive information.

6.3 The College is aware of the [Channel](#) process and of the opportunities for informal and formal sharing of information with relevant authorities. We will use these when we consider it is necessary and appropriate to do so in the interests of preventing people from being drawn into terrorism.

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**Staff Training and Awareness**

7.1 The College recognises that the effective operation of this Prevent Policy requires appropriate staff, contractors, and individuals within the governance of the College to be trained.

7.2 The College operates a tiered approach to training as set out below.

Level	Description / Training Required	Applicable to
Level 1	Home Office Prevent E-Learning (45 minutes) - to explain the purpose of Prevent, the process of radicalisation, how to identify when someone may be vulnerable to radicalisation, how to raise concerns and what a proportionate response looks like - <a href="#">HERE</a>  Training on College Policy at induction and at least once a year thereafter.	<ul style="list-style-type: none"> <li>All employees</li> <li>All member of the Academy Faculty</li> <li>All Members of the College's Governance Structure</li> </ul>
Level 2	Channel General Awareness - <a href="#">HERE</a>	<ul style="list-style-type: none"> <li>Programme Leaders</li> <li>Module Leaders</li> </ul> (Individuals should have also completed Level 1 training)
Level 3	The leadership challenge: the Prevent Duty for governing bodies and senior leaders in higher education (HE) – information can be found <a href="#">HERE</a>	<ul style="list-style-type: none"> <li>Prevent Lead (Chief Operations Director)</li> <li>Members of the Board &amp; ARCC Chair</li> </ul> (Individuals should have also completed Level 1 & 2 training)

7.3 The College recognises that our academic faculty and teaching staff, have the most contact with students day-to-day and are therefore more likely to identify where there may be a cause for concern. As a result, our academic faculty will be provided with quarterly updates (through Quarterly Supervisor Meetings) regarding Prevent and the College will cascade information to the teaching faculty from our Regional Prevent Group.

**Welfare and Pastoral Support**

8.1 The College has in place a range of pastoral support available to all students at the College, including:

8.1.1 Personal Tutors

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8.8.2 Student Assistant Programme (run through Spectrum Life)

8.8.3 Availability of free counselling (run through Spectrum Life).

8.2 Due to being a wholly virtual provider, the College does not have designated Chaplaincy support.

8.3 Where a student, or member of staff, is identified as being at risk in any way, including someone who has been drawn into expressing views that relate to harming themselves or others, are contradictory to the College's Equality and Inclusion Policy, or constitute harassment, actions will be taken to ensure that individual can access support.

8.4 The College may also take action against the student in accordance with the Student Disciplinary or Fitness to Study Policies. Where appropriate this may include external referrals.

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## Safety Online

9.1 The College has in place an Information Technology and Email Usage Policy which applies to all users of College IT facilities. We set out in that policy a range of activities that would be of concern to us including issues that arise from the University's statutory duty under the Counter Terrorism and Security Act 2015. This includes the creation, download, storage, transmission or display of material that promotes or incites racial or religious hatred, terrorist activities or hate crime; or instructional information about any illegal activities.

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## External Speakers and Events

10.1 The College actively manages risks around external speakers at events. This includes events run by the College (College owned events) and branded events taking place away from the College or virtually, seeking to maintain a safe environment where freedom of speech, expression and academic debate can exist.

10.2 In the context of this policy:

10.2.1 An External Speaker is defined as someone who is not an employee or contractor to the College. Contractors to the College, including members of the academic faculty, have been recruited following the College's defined recruitment processes for Contractors and have been inducted into the College

10.2.2 A College owned event is defined as anything run by the College which takes place outside of the normal scheduled activity of the College.

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10.2.3 A branded event is an event sponsored or publicly supported by the College

### 10.3 Booking and External Speaker for a College Owned Event

10.3.1 The College is committed to providing students with opportunities to meet and share the views of a range of subject specialists. In doing so, the College is committed to providing sufficient checks on everyone, before they are booked, to ensure they are suitable for Higher Education and pose no threat the students. External speakers must act in accordance with the law and not breach the lawful rights of others.

10.3.2 Most external speakers' requests will be straightforward and can be authorised by the Head of Business Development and Marketing and/or the Head of Curriculum using the External Speaker Due Diligence Form. However, where any concerns are raised the referral will be further considered by the Registrar and/or the Chief Operations Director.

10.3.3 The College reserves the right to not permit an external speaker to speak or attend an event, to refuse to permit an event and/or to halt an event at any time if it reasonably considers there may be a breach of this policy or of any legal obligation.

10.3.4 When booking and external speaker, due regard should also be given to the protection of free speech at the College (see below).

10.3.5 Where the event organiser has any concerns, they should be raised with the Prevent Lead, the Chief Operations Director, as set out below.

### 10.4 Branded Events

10.4.1 All College events taking place outside of the College's digital infrastructure must be authorised by the Head of Business Development and Marketing or the Head of Curriculum. Completion of the External Event Due Diligence Form is required (Annex 2).

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### Free Speech and Academic Freedom

11.1 The College is committed to providing staff and students with an environment where freedom of expression and speech (within the law) are protected but balanced with the need to ensure that the College is free from harm and hatred. The College maintains its responsibility to comply

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with the Human Rights Act (1998) and the Education (No.2) Act (1986) allowing staff and students their freedom of speech and expression, particularly in the context of academic freedom to question and put forward new ideas including controversial or unpopular opinions, Education Reform Act (1988). This must co-exist with the due regard to prevent people from being drawn into terrorism, Counter-Terrorism and Security Act (2015).

11.2 The approval of external speakers should not be denied on the grounds of policy or belief.

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**Reporting and Referrals – Cause for Concern**

12.1 **If there is an immediate concern where a person’s physical wellbeing is under threat the correct referral process is to call 999 and then inform the College Prevent Lead, Peter Liver (Chief Operations Director) at the earliest opportunity ([prevent@collegalpractice.com](mailto:prevent@collegalpractice.com)).**

**12.2 Cause for Concern**

12.2.1 Radicalisation can take place face-to-face or online. Whilst the risk of radicalisation is relatively low, a small number of students may be vulnerable to a range of radicalising causes, including religious radicalisation, far-right politics or animal rights extremism. Whilst children and vulnerable adults may be most at risk of radicalisation, students and staff who do not fall into these categories may also be at risk.

12.2.2 There is no set pattern to radicalisation, but there are some changes in behaviour that may prompt concerns that an individual is at risk of being radicalised, including:

- Noticeable changes in peer group or religious practices;
- Sudden or increased isolation from family/social group;
- Indication of the vulnerable person being insistently befriended by individuals or groups with radical views;
- Use of extremist or hate terms to exclude others or incite violence;
- Extremist political activism or the accessing, possession or distribution of materials advocating extremist views;
- An undertone of grievance or “us and them” language or behaviour;
- Increased emotional instability, and/or cultural or social anxiety;
- Possession of suspicious items (e.g., large amounts of money, multiple passports, unusually large amounts of everyday items that could be used to make incendiary devices).

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12.2.3 There may be many reasons for such changes, other than potential radicalisation, which is why a cause for concern and reporting approach should be adopted, as this enables the relevant services within and outside the College to identify the individual's needs and vulnerabilities.

### 12.3 Reporting and Referrals

12.3.1 **If there is an immediate concern where a person's physical wellbeing is under threat the correct referral process is to call 999 and then inform the College Prevent Lead, Peter Liver (Chief Operations Director) at the earliest opportunity ([prevent@collegalpractice.com](mailto:prevent@collegalpractice.com)).**

12.3.2 The Prevent Lead is the single point of contact for operational delivery of Prevent and is responsible for making all external referrals under our Prevent Policy. The Prevent National Referral Form will be used and can be found on the College's SharePoint.

12.3.3 Where a staff member or student has concerns relating to the radicalisation of an individual, they should, where appropriate, first check their concerns, either with others who might have noticed something (such as colleagues, Supervisors, Personal Tutors and Student Services), or speak to the person directly. They

12.3.4 Where concerns persist, the staff member or student should raise their concerns with the Prevent Lead, Peter Liver, by emailing [prevent@collegalpractice.com](mailto:prevent@collegalpractice.com)

12.3.5 Where a member of staff or student is not sure whether they should report a concern, they can contact their line manager, Module or Programme Leader of the Prevent Lead for advice.

12.3.6 The Prevent Lead will assess the concerns raised and determine whether to make an external referral to the College's Prevent partners, local authorities or the police. All concerns raised will be treated securely, sensitively, and so far as is possible, confidentially.

12.3.7 The Prevent Lead may seek advice from or make a referral to:

- seek advice from our Regional DfE Prevent Coordinator (*Chris Sybenga*; [chris.sybenga@education.gov.uk](mailto:chris.sybenga@education.gov.uk); 07384 456 640)
- the National Prevent Police Helpline (0800 011 3764)

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- the Local Authority Prevent Team,  
(Leeds Prevent; [prevent@leeds.gov.uk](mailto:prevent@leeds.gov.uk) 0113 535 0810)
  - the Police Prevent Team (0113 241 3386); or
  - Channel.
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**Ongoing Monitoring**

13.1 This policy will be reviewed at least annually, as part of the annual policy review, to determine it is still relevant, it is in line with any changes made to legislation and that it is in effective operation at the College.

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**Annex 1**
**External Speaker Due Diligence Form (College-Owned Events)**

This form should be completed by the Head of Business Development and Marketing or the Head of Curriculum prior to confirming the booking of an external speaker for a College-owned event.

Speaker Information	
Speaker Name	
Contact Details	
Is the Speaker representing a company? If yes, please state the company	
Information about the speaker's reputation. Note any due diligence undertaken and sources of evidence	

Review Questions	
Has the Speaker been prevented from speaking at the College or a similar establishment or previous been known to express views that may suggest a cause for concern?	
Does the proposed title or theme of the event present a potential risk that views/opinions expressed by the speaker(s) may be a cause for concern?	
Is the proposed speaker's theme likely to attract attendance from individuals/groups that have previously been known to express views that may be a cause for concern?	

**Guidance**

- If the answer to all three questions is NO: the event organiser can book the external speaker for the event or lecture
- If the answer to any of the questions is UNCLEAR: the event organiser must seek guidance from the Registrar or Chief Operations Director, whose responsibility it will be to further review the speaker(s) against the questions above.
- Ultimately, if the answer to any of the questions is YES: it is the responsibility of the event organiser to submit a referral to the Prevent Lead at the College, the Chief Operations Director, for the Prevent Lead to consider the risks vs the right of freedom of speech and expression.

**Where you have any concerns about a speaker, please refer to the College's Prevent Duty Policy and Procedure.**

Date Completed:

Completed by:

Referred to (if applicable):

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## Annex 2

### External Event Due Diligence Form

This form should be completed by the Head of Business Development and Marketing or the Head of Curriculum (whichever is more appropriate for the event) prior to confirming the College is publicly, supporting or sponsoring an event. Where it is not possible to complete this prior to confirming the College's support, the form should be completed as soon as possible after external speakers and content of the event is agreed.

External Event(s) Information	
Event Name and Date:	
Organiser and Location:	
Contact Details:	
Are any companies being represented at the event? Please provide details of any known companies and speakers.	

Review Questions	
Does the proposed theme of the event present a potential risk that views/opinions expressed by the speaker(s) may be a cause for concern?	
To your knowledge, has the event or the organiser previously expressed views that may be a cause for concern?	
Is the proposed event's theme likely to attract attendance from individuals/groups that have previously been known to express views that may be a cause for concern?	

### Guidance

- If the answer to all three questions is NO: the event organiser can book the external speaker for the event or lecture
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