

## ***Prevent Strategy and Policy***

### **1.0 Legislative Framework and Rationale**

Section 21 of the Counter-Terrorism and Security Act 2015 (the Act) places a duty on certain bodies, listed in Schedule 3 to the Act, to have “*due regard to the need to prevent people from being drawn into terrorism*”. The Act states that the authorities (including Further Education institutions) subject to the provisions must have regard to this guidance when carrying out the duty.

The College’s *Prevent* work is intended to deal with all kinds of terrorist threats to the UK. Threats to safety and security originate from a range of extremist groups.

Extremist groups pose a continued threat to our safety and security.

Extremism is defined by the UK Government 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*” (UK Government, 2015).

The College’s *Prevent* work depends on effective partnership. To demonstrate effective compliance with the duty, the College has ensured productive co-operation with the police and local authorities and co-ordination through existing multi-agency forums, for example the *Prevent Silver* partnership.

This strategy has been discussed with the *Prevent* Officer at Humberside Police, DC Lee Ross (email: [lee.ross@humberside.pnn.police.uk](mailto:lee.ross@humberside.pnn.police.uk) , mobile: 07944 466733, tel: 01472 204579, ext. 1879).

Critically, the College views *Prevent* as an additional aspect of its already well-established Safeguarding Policies and Procedures.

### **2.0 Staff training**

- 2.1 The College recognises the need to provide appropriate training for staff involved in the implementation of this duty.
- 2.2 The College Leadership Team, the Assistant Principals and Deputy Directors of Student Services have received training to understand the Government rationale for *Prevent* and the channels for further action and referral (updated as required)
- 2.3 All College staff should understand what radicalisation means and why people may be vulnerable to it. They need to be aware of what we mean by the term “extremism” and the relationship between extremism and terrorism.

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- 2.4 Staff need to know what measures are available to prevent people from becoming drawn into terrorism and how to challenge the extremist ideology that can be associated with it. They need to understand how to obtain support for people who may be being exploited by radicalising influences.
- 2.5 The College works with external partners to ensure that appropriate training programmes are delivered to staff and governors. Initial briefings and training have been led by *Prevent* specialists at Humberside Police.
- 2.6 Staff Training programmes will ensure that the following learning outcomes are addressed:
  - 2.6.1 All staff should understand the process and policies in place when vulnerability has been identified.
  - 2.6.2 All staff are aware of the internal referral systems if they have a concern.
  - 2.6.3 All staff should know when referrals should be made to the Channel programme, and how to use College processes to do this
  - 2.6.4 All staff should know how and where to get additional advice and support.

## 3.0 Information Sharing

- 3.1 The *Prevent* programme must not involve any covert activity against people or communities. However, specified authorities may need to share personal information to ensure, for example, that a person at risk of radicalisation is given appropriate support (for example on the Channel programme). Information sharing must be assessed on a case-by-case basis and is governed by legislation. To ensure the rights of individuals are fully protected, the College ensures that information-sharing agreements are in place at a local level.
- 3.2 When considering sharing personal information, the College should take account of the following:
  - 3.2.1 **Necessity and proportionality:** personal information should only be shared where it is strictly necessary to the intended outcome and proportionate to it. Key to determining the necessity and proportionality of sharing information will be the professional judgement of the risks to an individual or the public.
  - 3.2.2 **Consent:** wherever possible the consent of the person concerned should be obtained before sharing any information about them.
  - 3.2.3 **Power to share:** the sharing of data by public sector bodies requires the existence of a power to do so, in addition to satisfying the requirements of the Data Protection Act 1998 and the Human Rights Act 1998.
  - 3.2.4 **Data Protection Act and the Common Law Duty of Confidentiality:** in engaging with non-public bodies, the specified authority should ensure that they are aware of their own responsibilities under the Data Protection Act.

## 4.0 Disclosure and Referrals

- 4.1 Where a member of staff has any concerns about a student, as a matter of urgency they should refer the matter to **Vicki Pannell (Designated Safeguarding Lead) or, in her absence, a member of the Safeguarding Team or the College Leadership Team.** There may be some circumstances where the College, in the course of *Prevent*-related work, identifies

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someone who may already be engaged in illegal terrorist-related activity. People suspected of being involved in such activity should be referred to the police by the Designated Safeguarding Lead or her delegated alternative.

### 5.0 Prevent Compliance

- 5.1 The College fully recognises its role in helping prevent people being drawn into terrorism, which includes not just violent extremism but also non-violent extremism, which can create an atmosphere conducive to terrorism and can popularise views that terrorists exploit.
- 5.2 The College understands that radicalisation is usually a process not an event. During that process, behaviours as well as opinions are likely to change. These changes may be apparent to the friends, families and work colleagues of the person concerned.
- 5.3 It is a condition of funding that as a further education provider, the College must comply with relevant legislation and any statutory responsibilities associated with the delivery of education and safeguarding of children and young adults.
- 5.4 The *Prevent* Strategy is to be implemented in a proportionate and risk-based way ensuring that opportunities in the Further Education curriculum are used to promote the British values to learners. British values are defined as “*democracy, the rule of law, individual liberty and mutual respect and tolerance for those with different faiths and beliefs*”. These values are clearly mapped in tutorial programmes.
- 5.5 The College will encourage young people to respect others with particular regard to the protected characteristics set out in the Equality Act 2010.
- 5.6 Young people will be taught about radicalisation and extremism as a part of the tutorial programme.
- 5.7 The *Prevent* work undertaken at the College will be closely aligned with the existing Safeguarding procedures.
- 5.8 The College already has robust procedures both internally and externally for sharing information about vulnerable individuals. Any concerns about a student at risk of radicalisation, should be made as a Safeguarding referral. This must be passed to the Designated Safeguarding Lead as a matter of urgency.
- 5.9 The Designated Safeguarding Lead will decide upon whether a referral to an external agency is appropriate. Various information sharing agreements with agencies are in place. Where appropriate and legal to do so, the College will always share information with other institutions and key partners, such as the local *Prevent Silver* group.
- 5.10 The Corporation ensures that safeguarding arrangements take into account the procedures and practice of the local authority as part of the inter-agency safeguarding procedures set up by the Local Safeguarding Children Board (LSCB). The College has a Safeguarding policy (which includes the *Prevent* duty) in accordance with government guidance and the College ensures that it abides by locally agreed inter-agency procedures put in place by the LSCB and *Prevent* co-ordinators across the authority.

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- 5.11 The Corporation will ensure that the College's *Prevent* Strategy complies with the *Prevent* duty as set out in the Counter Terrorism and Security Act 2015 and will scrutinise practice in the College, making sure that the policies and procedures in place are followed to prevent people being drawn into terrorism and extremism.
- 5.12 The Safeguarding Link Governor is fully aware of the *Prevent* Strategy, and holds the Designated Safeguarding Lead to account in this.
- 5.13 The Corporation receives training related to the *Prevent* duty and the College's Strategy, and regular updates are provided to the board.
- 5.14 Governors must exemplify in their conduct the British values of democracy, the rule of law, individual liberty and mutual respect and tolerance for those with different faiths and beliefs.
- 5.15 Governors will ensure that they and the College actively engage with other sectors and partners to comply with and carry out the *Prevent* duty.

### **6.0 *Prevent* risk assessment and outside speakers**

- 6.1 The College takes seriously its responsibility to exclude those promoting extremist views that support or are conducive to terrorism. Outside speakers who are deemed to have extremist views will not be invited into the College.
- 6.2 The College has a robust system for assessing and rating risks associated with any planned events and visiting speakers, providing evidence to suggest whether an event should proceed, be cancelled or whether mitigating action is required (for example a member of staff alerting the further education *Prevent* co-ordinators to concerns in relation to a guest speaker).
- 6.3 All events and speakers are assessed and approved by the College Leadership Team (CLT)
- 6.4 The College Leadership Team (CLT) may ask to see the content of speaker's materials prior to the event, including an outline of the topics to be discussed and sight of any presentations, footage to be broadcast, etc.
- 6.5 All visiting speakers will be supervised by a member of the College's staff, who are expected to interject or stop an event if they feel that the speaker is promoting extremist views or inequality in any form. Staff are required to book events using FIS (Visitors) with sufficient notice to allow the College Leadership Team to undertake checks and for cancellation to take place if necessary.

### **7.0 Online and e-Safety**

The College uses filtering as a means of restricting access to harmful content. The College filtering systems are Sophos UTM. This ensures that websites promoting extremist views and encouraging the radicalization of young people are automatically blocked. In addition to this, the CLT team and the Learning Centre Manager continuously monitor activity on the network surveillance software.

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The College has policies relating to the use of IT on the premises. IT policies and procedures contain specific reference to the *Prevent* duty. As some young people and staff may be using IT in the course of their learning, and this may involve research relating to terrorism and counter-terrorism, the College has clear policies in place to identify and address instances where online materials are accessed for curriculum purposes.

### 8.0 Prayer and Faith Facilities

The College does not at present have a bookable prayer room. Should this change, the College Leadership Team will ensure and there are clear and widely available policies for the use of faith-related facilities.

### 9.0 Additional Links and Useful Information

Counter Terrorism Bill

<http://www.legislation.gov.uk/ukdsi/2014/9780111123737/contents>

Universities UK Guidance

<http://www.universitiesuk.ac.uk/highereducation/Pages/Externalspeakersinhighereducationinstitutions.aspx#.VH3u5zGsWXo> - Freedom of Speech on Campus: rights and responsibilities in UK universities (2011)

<http://www.universitiesuk.ac.uk/highereducation/Pages/FreedomOfSpeechOnCampus.aspx#.VH3uzzGsWXo> - External speakers in higher education institutions (2013)  
[www.safecampuscommunities.ac.uk](http://www.safecampuscommunities.ac.uk)

2011 Government *Prevent* Strategy (page 71 for HE & FE)

[https://www.gov.uk/government/uploads/system/uploads/attachment\\_data/file/97976/prevent-strategy-review.pdf](https://www.gov.uk/government/uploads/system/uploads/attachment_data/file/97976/prevent-strategy-review.pdf)

Extremism Task Force Final Report (page 6 for HE & FE)

[https://www.gov.uk/government/uploads/system/uploads/attachment\\_data/file/263181/ETF\\_FINAL.pdf](https://www.gov.uk/government/uploads/system/uploads/attachment_data/file/263181/ETF_FINAL.pdf)

National Channel Guidance

[https://www.gov.uk/government/uploads/system/uploads/attachment\\_data/file/118194/channel-guidance.pdf](https://www.gov.uk/government/uploads/system/uploads/attachment_data/file/118194/channel-guidance.pdf)

National Union of Students Guidance for Managing External Speakers

<http://www.nusconnect.org.uk/asset/News/6013/Hate-Speech-Guidance-Web.pdf>

Charity Commission Compliance Toolkit/Protecting Charities from Harm (Chapter 5)

[http://webarchive.nationalarchives.gov.uk/+http://www.charitycommission.gov.uk/our\\_regulatory\\_activity/counter\\_terrorism\\_work/compliance\\_toolkit\\_5.aspx](http://webarchive.nationalarchives.gov.uk/+http://www.charitycommission.gov.uk/our_regulatory_activity/counter_terrorism_work/compliance_toolkit_5.aspx)

Working Together to Safeguard Children 2015 (Page 55 onwards)

<http://webarchive.nationalarchives.gov.uk/20130401151715/https://www.education.gov.uk/publications/eOrderingDownload/00305-2010Dom-EN-v3.pdf>

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FAST (Families Against Stress and Trauma), a community organisation that supports vulnerable families and individuals, has launched the 'Families Matter' campaign. This film featured testimonies from three families who suffered from a loved one travelling to Syria. For more information on the campaign and to watch the film see; [www.familiesmatter.org.uk](http://www.familiesmatter.org.uk). For information on the launch see: [www.gov.uk/government/news/home-secretary-supports-launch-of-families-matter-campaign](http://www.gov.uk/government/news/home-secretary-supports-launch-of-families-matter-campaign).