



## PREVENT POLICY

<b>Policy Version Number</b>	SCL/PP/APR2024/03	
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<b>Record of Revisions to Policy</b>		
<b>Date</b>	<b>Details</b>	<b>Approved by</b>
28 MAY 2018	Published	BoD
23 MAY 2021	Reviewed	BoD
23 MAY 2023	Reviewed	BoD
13 APR 2024	Reviewed	BoD
<b>Date of Current Policy</b>	13 APR 2024	
<b>Policy Review Date</b>	12 APR 2025	
<b>Review to be approved by</b>	BOD	



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## **Contents**

## **Page**

Prevent Policy	3
Purpose	3
Scope	3
Principles	4 - 5
Approach	5
Leadership	5
Risk Assessment and Action Plan	6
External Speakers	6
Staff Training	6
Faith Facilities	7
IT Networks	7
Communications	7
Information Sharing	7
Roles and Responsibilities	8
Teaching and Learning	8

## **Prevent Policy**

Stratford College London is required under the Counter-Terrorism and Security Act 2015 to 'have due regard to the need to prevent people from being drawn into terrorism'. Under section 29, it must have regard to guidance issued by the Home Secretary. The Prevent Duty Guidance for higher education institutions in England and Wales came into effect on 18 September 2015 following approval by Parliament. This document sets out how we are complying with the Duty.

Prevent is one of four strands of the Government's counter terrorism strategy – CONTEST. The UK currently faces a range of terrorist threats. Terrorist groups who pose a threat to the UK seek to radicalise and recruit people to their cause. Therefore, early intervention is at the heart of Prevent which aims to divert people away from being drawn into terrorist activity.

### **Purpose**

- ensure an awareness of "Prevent" within the College;
- provide a clear framework to structure and inform our response to potential radicalisation, including a supportive referral process for those who may be susceptible to the messages of extremism;
- to provide a framework to embed British Values into the curriculum and ways of working; and
- recognise current practice which contributes to the Prevent agenda and identify areas for improvement

### **Scope**

The Prevent Policy applies to all staff and (where relevant) students of Stratford College London. It places responsibilities on College staff; learners; and volunteers; contractors; visitors; and those working under self-employed arrangements.

### **Principles**

The College accepts its legal responsibility to have due regard to the need to prevent people from

being drawn into terrorism. In accepting this responsibility it must also balance detailed Prevent requirements against its core mission to ensure that certain fundamental standards, vital to a thriving academic community, are preserved. This balance is achieved by ensuring that any changes to operational policies, guidelines, processes, systems or working practices, implemented to ensure Prevent compliance, align with the one or more of the following core Prevent principles:

1. Safeguarding. Preventing vulnerable individuals from being drawn into terrorism is a safeguarding issue and College policies and procedures in place to help safeguard staff and students should take into account the Prevent requirements.
2. Staff awareness. Staff should be made aware of the general requirements of Prevent but in ways that ensure they remain sensitive to the cultural, religious and ethnic diversity of the university community.
3. Senior accountability. Senior College officers will maintain a risk register and will monitor the institutional risk of College members being drawn into terrorism. A designated senior member of staff will be assigned lead responsibility in this policy for all Prevent related policies and measures.
4. Celebrating diversity. The culturally diverse nature of the College must be actively celebrated and promoted to counter the threat of radicalisation from external influences
5. Multi-faith. The provision of adequate facilities to allow groups to observe their faith, are essential to harmonious community relations and inter-faith dialogue so are an important element of the College's Prevent approach.
6. Information sharing. Some internal and external information sharing will be necessary but only under appropriately controlled conditions. This does not amount to an agreement to share personal data on anything other than a needs based and case by case basis.
7. Academic freedom. The ability of students and staff to research, teach and debate any topic will not normally be fettered unless, on a case by case basis, a specific threat is identified or a clear Prevent requirement exists.
8. Free speech. Policies and procedures relating to the management of events, speakers and the display of posters and other promotional material must balance the obligation to enable free speech with the requirements of Prevent
9. Social media. Social media, whilst ostensibly just another medium for communication, social interaction and debate, requires specific guidance and monitoring consistent with the

College's free speech obligations. Social media is a vehicle by which vulnerable individuals are particularly susceptible to radicalisation.

10. Website Filtering. The College will block access to specific websites, network resources and IP addresses that provide or facilitate access to extremism materials in relation to the College's Prevent duty. Staff and students wishing to view material on external websites whose access has been disabled by targeted filtering should refer to the Prevent Policy
11. Partnerships. The College should work in partnership with statutory agencies, other HEIs, local authorities and other bodies to assess and respond to the risk of people being drawn into terrorism.

### **Approach**

The College welcomes the Government's intention that the Prevent Duty is implemented in a proportionate and risk-based way and that it should not create large new burdens on institutions. We therefore intend to implement our legal responsibilities as part of our existing policies and procedures, which we also consider to be the best way of ensuring a joined-up approach. In doing this we will actively involve the Students and will continue to consult them should any changes to this policy be required in the future.

### **Leadership**

The College takes seriously at the highest levels the need to prevent terrorism occurring in our community. Our approach has been approved by the Principal, following consideration in the Academic Board who have approved the Policy. The Student Welfare Officer has been identified as the member of management responsible for ensuring that the College complies appropriately with the Prevent Duty, in liaison with the regional Prevent coordinator and other key stakeholders within and beyond the College.

### **Risk Assessment and Action Plan**

As required by the Prevent Duty, we have carried out an assessment of the risk of our students being drawn into terrorism. This risk assessment will be reviewed at least annually by the Academic Board. Where any significant risk is identified we will consider what action might mitigate the impact/likelihood of that risk crystallising, and if necessary include it in the College's Prevent Action Plan.

### **External Speakers**

We will ensure that we meet the different legal requirements on us, not least the duty under the Education (No. 2) Act 1986 to secure freedom of speech within the law. Under the Code of Practice, where the views expressed constitute views that risk drawing people into terrorism, or are shared by terrorist groups, permission must be sought by the staff or student organiser from the College Representative. Due diligence is carried out where required and we will share information with other institutions if appropriate about any particularly problematic event that comes within the remit of Prevent.

In complying with the Prevent Duty the College will not:

- Provide a platform for any proscribed terrorist organisation or encourage terrorism in any way;
- Allow gender segregation at any event it organises.

In conjunction with the College's Policy, the Students have their own complementary procedures in place in relation to events where external speakers will be participating.

### **Staff Training**

We will carry out training on a regular basis for all relevant staff so that they can recognise those who are vulnerable of being drawn into terrorism and potential signs of radicalisation. This training will be carried out after consultation with our Prevent Coordinator. It will include an explanation of how to handle appropriately and sensitively any concern that may emerge. For those with whom any specific concerns will be raised (primarily staff in Welfare Department), differentiating the risk of radicalisation from other issues will be covered in more detail, together with the opportunities and requirement to share information confidentially where needed. Our approach will be to support vulnerable students in whatever circumstance they find themselves, recognising that radicalisation could occasionally be occurring when certain behaviour is manifest but that other explanations will usually apply.

### **Faith Facilities**

The College seeks to ensure that appropriate provision is made for those of any faith (or those without faith) to access appropriate facilities for pastoral care and for religious purposes. We provide a multi-faith prayer room, as well as a lecture room for a two hour period every Friday for Friday prayers. The College ensures that Prayer Room is only used for praying purposes and not for any discussions or endorsements.

### **IT Networks**

We consider it unacceptable for our IT networks to be used in any way that supports, promotes or facilitates terrorism. We have referenced Prevent in our relevant IT policy and will keep under regular review the possible use of filters as a means of restricting access to content covered by the Prevent Duty as part of our risk assessment process and in discussion with other universities. Social media services such as Facebook, Twitter and Reddit provide new avenues for the distribution and accessing of extremist material, and the College takes the challenges presented by social media very seriously. If any misuse of the College's branding on social media accounts is discovered then action will be taken in accordance with the terms and conditions of the relevant platform.

### **Communications**

We will not permit material supporting terrorism to be displayed within College premises and will remove any such material if it is found. Likewise, we will seek to ensure that the College's printed and electronic communications (including its website) do not contain or support terrorist material or material likely to encourage terrorism and will investigate immediately if any such instances are raised. It is acknowledged that there will be legitimate reasons to display materials relating to

terrorism as part of legitimate teaching activities.

### **Information Sharing**

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. Information sharing will only take place with external authorities when this is consistent with the provisions of the Data Protection Act.

### **Roles and Responsibilities**

All members of staff should be aware of the College's responsibilities under the Prevent Duty and of the measures set out above to comply with it. Members of the College community who are concerned about a student who might be at risk of being drawn into terrorism should report this to their line manager or the Principal. Concerns about members of staff who might be at risk of being drawn into terrorism should be reported to the Prevent Officer.

### **Teaching and Learning**

To provide a curriculum that promotes British Values, knowledge, skills and understanding, to build the resilience of learners by undermining extremist ideology and supporting the learner voice.

This will be achieved through:

- embedding British Values, equality, diversity and inclusion, wellbeing and community cohesion throughout the curriculum;
- promoting wider skills development such as social and emotional aspects of learning;
- a curriculum adapted to challenge extremist narratives and promote universal rights;
- teaching, learning and assessment strategies that explore controversial issues in a way that promotes critical analysis;
- encouraging active citizenship and learner voice.