

CC CLEVELAND COLLEGE OF
AD ART & DESIGN

TITLE:	Prevent Policy and Procedure		
VERSION:	1		
AUTHOR:	John Waddington (Head of FE)		
CONSULTATION TAKEN PLACE WITH:	Michael Wheaton Teresa Latcham	DATE:	December 2015
APPROVED BY:	Safeguarding Committee	DATE:	December 2015
DATE TO BE REVIEWED:	September 2018		
Update Approved by	Safeguarding Committee		
Date	March 1 st 2017		

Policy

Introduction

Section 21 of the Counter-Terrorism and Security Act 2015 (the Act) places a duty on certain bodies, 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.

The 2011 Prevent strategy has three specific strategic objectives:

- respond to the ideological challenge of terrorism and the threat we face from those who promote it;
- prevent people from being drawn into terrorism and ensure that they are given appropriate advice and support; and
- work with sectors and institutions where there are risks of radicalisation that we need to address.

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 will ensure productive co-operation with local PREVENT co-ordinators, the police and local authorities, and co-ordination through existing multi-agency forums, for example Community Safety Partnerships.

The College’s PREVENT work crosses all departments of the college including staff awareness training, embedding of British values in the curriculum, robust procedures and policies for highlighting concerns, a Safe use of IT policy and network monitoring and Internet safety workshops for students.

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

Policy Statement

Cleveland College of Art and Design expects all staff (both academic and business support) to carry out the College’s PREVENT duty. In addition academic and pastoral support staff have a duty to engage and consult with students on the Colleges plans to implement the duty.

Staff Training

- The College recognises the need to provide appropriate training for staff involved in the implementation of this duty.
- All staff (academic and business support) will undertake online training to understand the Government rationale for PREVENT and the channels for further action and referral.

- College staff will 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.
- 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.
- The College will work with external partners to ensure that appropriate training programmes are delivered to staff.
- Staff Training programmes will ensure that the following learning outcomes are addressed:
 - All staff should understand the process and policies in place when vulnerability has been identified.
 - All staff are aware of the internal referral systems if they have a concern.
 - All staff should know when to make referrals to the Channel programme.
 - All staff should know how and where to get additional advice and support.

Information Sharing

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.

When considering sharing personal information, the College will take account of the following:

- **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.
- **Consent:** wherever possible the consent of the person concerned should be obtained before sharing any information about them.
- **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.
- **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.

Location and Access to the Policy

Cleveland College of Art and Design Moodle (VLE) and Intranet.

Person Responsible for the Policy

FE PREVENT Lead (Head of FE)

Procedure

Where a member of staff has any concerns about a student, as a matter of urgency they should refer the matter to: **Mike Wheaton (HE) or John Waddington (FE) (Designated Safeguarding Officers and PREVENT Leads) or, in their absence, a member of the Safeguarding Team.** There may be some circumstances where the College, in the course of PREVENT - related work, identifies 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 a Safeguarding Lead or Officer.

PREVENT Compliance

- 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 which terrorists exploit.
- 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.
- 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.
- 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 should be clearly mapped in schemes of work and pastoral workshops.
- The College will encourage young people to respect others with particular regard to the protected characteristics set out in the Equality Act 2010.
- Young people will be taught about radicalisation and extremism as a part of the curriculum.

The PREVENT work undertaken at the College will be closely aligned with the existing Safeguarding procedures.

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 on the standard Safeguarding referral form. These forms must be passed to the Operational Safeguarding Officer or PREVENT lead as a matter of urgency.

- The Operational Safeguarding Officer or PREVENT lead will decide upon whether a referral to an external agency is appropriate. Where appropriate and legal to do so, the College will always share information with other institutions and key partners, such as FE prevent co-ordinators.
- The Safeguarding Governor is fully aware of the *Prevent Strategy* and holds the Operational and Strategic Safeguarding Officer to account in this duty.
- The Governing Body receive training related to the *Prevent Strategy*, and regular updates are provided to the board.

PREVENT Risk Assessment and Outside Speakers

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.

- The College has a system for assessing 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.
- All events and speakers are assessed and approved by the Heads of FE or HE.
- The Heads 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.
- All visiting speakers will be supervised by a member of the Colleges 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.**
- Outside speakers who are deemed to have extremist views will not be invited into the College.
- Staff are required to book events with sufficient notice to allow Heads to undertake checks and for cancellation to take place if necessary.
- Any posters or leaflets to be displayed in the College and from external organisations must be from reliable sources, for example the NHS. If a source cannot be reliably verified the Head of FE or HE must give permission for the items to be displayed.

Safety Online

- The College has policies relating to the use of IT on the premises. IT policies and procedures contain specific reference to the PREVENT duty.
- The College uses filtering as a means of restricting access to harmful content. This ensures that websites promoting extremist views and encouraging the radicalisation of young people are automatically blocked. In addition to this, the IT network team and the Safeguarding Lead monitor online activity through use of Impero Software.
- The Strategic Safeguarding Lead receives an email alert if and when extremist or radicalisation related material is accessed on College Networks. The College Safeguarding procedure is followed when such incidents occur.
- A log of Online related issues, brought to the attention of the Strategic Safeguarding Lead or Operational Safeguarding Lead will be discussed at monthly safeguarding meetings and reported to Safeguarding Committee at least annually.
- 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.

Prayer and Faith Room

The College has a faith room. The use of this room is centralised and any member of staff wishing to use the room should have gained prior permission by the Head of FE or HE. Student services should be contacted in the event of a student wishing to utilise the space, who can arrange access and also monitor use.

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

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

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

Revised Prevent Duty Guidance

https://www.gov.uk/government/uploads/system/uploads/attachment_data/file/445977/3799_Revised_Prevent_Duty_Guidance__England_Wales_V2-Interactive.pdf