

Prevent Duty Policy

Policy Reference	SGP-02
Issue Date	November 2019

Document Control

Owner	Vice Principal of Quality and Curriculum
Audience	All Moulton College Stakeholders
Confidentiality	Low

Version Control

Version	Description/Changes	By	Date
1.0	Release	DQI	June 2016
2.0	Update	DQI	June 2017
2.1	Update	DQI	June 2018
3.0	Review and Update	DQI	Nov 2019

Approval

Approved By	Meeting Date	Next Review
Board of Governors	June 2018	July 2020

Related Policies

Ref.	Policy
	Freedom of Expression policy
	Visiting Speaker policy
	Child Protection and Safeguarding Policy
	Acceptable use of IT policy
	Anti-bullying policy

Equality Impact Assessment

Equality Impact Assessment
No change required – the assessment is that the policy is/will be robust. There is no evidence of potentially unlawful discrimination and all reasonable opportunities to advance equality and foster good relations have been taken, subject to continuing monitoring and review

Prevent Duty Policy

Policy Statement

1. The Counter-Terrorism and Security Act 2015 identifies the College as a 'specified authority' that has to have due regard to the need to prevent people from being drawn into terrorism. The College is expected to do the following;
 - Demonstrate that there is active engagement from governors, the Principal, managers and leaders with other partners including the police and regional higher and further education Prevent co-ordinators.
 - Carry out a risk assessment which assesses where and how students or staff may be at risk of being drawn into terrorism.
 - Demonstrate that appropriate training is provided for the Principal, governors, leaders and staff.
 - Provide clear and widely available policies for the use of any faith related facilities or prayer rooms.
2. The College recognises its duties with regard to the act and the National Prevent Strategy.

Policy Standards

3. The College will embed the core values of respect, equality, diversity, inclusion, democratic principles and the importance of learner voice and participation within its activities.
4. The College will support staff and students in understanding the issues that may lead individuals to be drawn into terrorism and equip them with the knowledge and skills to protect themselves and identify others who may require support.
5. The College will engage fully with local partners including the police in developing partnership approaches to preventing terrorism.
6. The College will provide a curriculum for all students that promotes knowledge, skill and comprehension of its core values so as to undermine extremist ideologies and support students to challenge such views.
7. The College will provide a curriculum that promotes shared (British) values including democracy, the rule of law, individual liberty and tolerance of different faiths and beliefs.
8. The College will, through its safeguarding and wellbeing procedures, ensure that staff are confident in taking preventative and responsive steps to support students and colleagues at risk of radicalisation. This will include working with other partners and referring to the Channel process, if appropriate.
9. The College will develop a Prevent risk assessment and action plan to ensure that it complies fully with the Prevent Duty. This will be reviewed at least annually and informed by the police counter-terrorism local profile.

10. The College will ensure that procedures are in place to approve requests for visiting speakers or external group bookings to prevent it from inadvertently providing a platform for extremist groups.
11. The College will ensure that clear procedures are in place for the use and supervision of *The Space* (multi-faith facility).
12. The College will ensure an effective web-filtering and monitoring protocol operates to restrict access to harmful and extremist content.

Responsibilities

13. The Corporation Board are responsible for ensuring that the college complies with its legal responsibilities under the Counter-terrorism and Security Act 2015.
14. The Senior Leadership Team are responsible for ensuring that college activities support the fulfilment of the Prevent Duty.
15. The Vice Principal for Curriculum and Quality, as the designated senior person for safeguarding, is responsible for preparing the Prevent risk assessment and action plan and for its regular review. They will also act as the single point of contact for Prevent.
16. The Assistant Director(s) of Curriculum and Student Experience and the Head of Higher Education are responsible for ensuring that the curriculum delivery provides students with the knowledge and skills to challenge extremist ideologies and promote shared values and mutual respect.
17. The Assistant Director of Facilities is responsible for ensuring that external events hosted at the college do not compromise its Prevent duty responsibilities and that site security arrangements are sufficient to restrict access by unauthorised individuals and groups.
18. The Director of Human Resources is responsible for supporting staff including providing guidance in relation to concerns about colleagues or referral to external services including Channel as appropriate.
19. The Student Support Manager is responsible for oversight of *The Space* and the provision of a chaplaincy service. They also oversee support for vulnerable students including referral to external services including Channel as appropriate.
20. The Network Development and Services Manager is responsible for ensuring the provision of an effective web filtering and monitoring service.
21. All staff are responsible for promoting equality, diversity, inclusion, mutual respect and tolerance through their language, behaviours and operating practices.

Definitions

22. **Extremism** is defined as a vocal or active opposition to British values including democracy, the rule of law, individual liberty and mutual respect and tolerance for different faiths and beliefs. It also includes calls for the death of members of the UK armed forces whether in this country or overseas.

23. **Radicalisation** is defined as the process by which an individual is driven to develop and espouse views and beliefs that reflect extremist ideologies.
24. **Terrorism** is defined as the use of violence or intimidation to achieve an aim through the creation of a state of terror.
25. The Counter-terrorism and Security Act 2015 contains a duty on specified authorities to have due regard to the need to prevent people from being drawn into terrorism. This is also known as the **Prevent Duty**.
26. The Prevent strategy has three strands. These are:
 - to respond to the ideological challenge of terrorism and the threat we face from those that promote it,
 - to prevent people from being drawn into terrorism and ensure they are given appropriate advice and support and
 - to work with sectors and institutions where there are risks of radicalisation that we need to address.
27. The **Channel** programme is part of the Prevent strategy. It focuses on providing support at an early stage to people who are identified as being vulnerable to being drawn into terrorism. It is a multi-agency approach to protecting vulnerable people by:
 - Identifying individuals at risk,
 - Assessing the nature and extent of the risk and
 - Developing the most appropriate support plan for the individual concerned.
28. Channel is about ensuring vulnerable people receive support before they are exploited by those who would want them to embrace terrorism and before they become involved in criminal terrorist related activity.

Appendix 1 – Equality Impact Assessment

Policy name: Prevent Duty policy

Assessment date: June 2017

What are the aims of the policy?	To ensure that the college fulfils its statutory responsibilities under the Counter – terrorism and Security Act 2015
Who does the policy affect?	Staff, students, Governors, and external visitors
Who is involved in implementing the policy?	Governors, SLT, managers and college staff
What information is currently available about the impact of this policy and its associated procedures?	Visiting speaker approval forms External booking approvals
Do you need more information to help you make an assessment about the impact of this policy and its associated procedures?	
Do you have any examples that show how this policy will have a positive impact on any of the equality characteristics listed in the table below?	No
Which other policies does this policy link with?	Safeguarding, Visiting Speakers, Freedom of Expression, Acceptable IT use, Anti-bullying, Equality
What consultation has taken place in the development of this policy?	Developed in response to statutory guidance

Use the table below to assess the impact of this policy on each of the listed characteristics. Your decision must be evidence based. Sources of evidence might include success rates, achievement gaps, application and enrolment data, student voice, consultation outcomes, recruitment and employment data, customer feedback or complaints, meeting minutes

*Characteristics 1-9 are protected under the Equality Act 2010

Characteristic*	Negative impact? Y / N	Evidence to support your impact assessment decision	Requires further action? Y/N
Race	Y	There is potential for this policy to result in discrimination against different races. However careful monitoring of decisions relating to visiting speakers or external bookings will be sufficient to identify emerging trends. Careful review of the handling of any incidents involving allegations of bullying will also identify any potential discrimination against this group.	N
Disability	N	No identified impact from this policy	N
Gender	N	No identified impact from this policy	N

Characteristic*	Negative impact? Y / N	Evidence to support your impact assessment decision	Requires further action? Y/N
Gender re-assignment	N	No identified impact from this policy	N
Age	N	No identified impact from this policy	N
Sexual orientation	N	No identified impact from this policy	N
Religion / belief	Y	There is potential for this policy to result in discrimination against different religions or beliefs. However careful monitoring of decisions relating to visiting speakers or external bookings will be sufficient to identify emerging trends. Careful review of the handling of any incidents involving allegations of bullying will also identify any potential discrimination against this group.	N
Pregnancy / maternity	N	No identified impact from this policy	N
Marriage / civil partnership	N	No identified impact from this policy	N
Socio-economic	N	No identified impact from this policy	N

Overall EIA judgement

Tick one	
✓	No change required – the assessment is that the policy is/will be robust. There is no evidence of potentially unlawful discrimination and all reasonable opportunities to advance equality and foster good relations have been taken, subject to continuing monitoring and review
	Adjust the policy or practice – this involves taking steps to remove any barriers, to better advance equality and/or to foster good relations. This may involve removing or changing the aspect of the policy that creates any negative or unwanted impact. It may also involve introducing additional measures to reduce or mitigate any potential negative impact
	Continue the policy – this means adopting/continuing with the policy despite the potential for adverse impact. Set out the rationale for this decision, including how the decision is compatible with our legal obligation. Where there is discrimination, but it is considered not to be unlawful – the objective justification must be recorded
	Stop the policy – if there would otherwise be unlawful discrimination or adverse effects that are not justified and cannot be prevented/mitigated