POLICY 026
PREVENT DUTY

If you have a disability which makes reading this document or navigating our website difficult and you would like to receive information in an alternative format, please contact: anddegree@acm.ac.uk

Policy 026: PREVENT Duty

Policy 026: PREVENT Duty

Policy Opening Statement

When operating this policy, ACM uses the following accepted UK Government definition of extremism, which is:

'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; and/or calls for the death of members of our armed forces, whether in this country or overseas'.

The KCSIE 2022 document offers the updated definitions of the following:

Extremism is the vocal or active opposition to our fundamental values, including democracy, the rule of law, individual liberty and the mutual respect and tolerance of different faiths and beliefs. This also includes calling for the death of members of the armed forces.

Radicalisation refers to the process by which a person comes to support terrorism and extremist ideologies associated with terrorist groups.

Terrorism is 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.

The Prevent duty should be seen as part of schools' and colleges' wider safeguarding obligations. Designated safeguarding leads and other senior leaders should familiarise themselves with the revised Prevent duty guidance: for England and Wales, especially paragraphs 57-76, which are specifically concerned with schools (and also covers childcare). The guidance is set out in terms of four general themes: risk assessment, working in partnership, staff training, and IT policies. There is additional guidance: Prevent duty guidance: for further education institutions in England and Wales that applies to colleges.

All extremists aim to develop destructive relationships between different communities by promoting division, fear and mistrust of others based on ignorance or prejudice and thereby limiting the life chances of young people. Education is a powerful weapon against this; equipping young people with the knowledge, skills and critical thinking, to challenge and debate in an informed way.

ACM does not tolerate extremist views of any kind whether from internal sources; learners, staff or governors, or external sources; college community, external agencies or individuals. Students see ACM as a safe place, free from harm or risk of harm and where necessary we will action referrals or processes to ensure ACM remains a safe place for all.

At ACM we recognise that extremism and exposure to extremist materials and influences can lead to poor outcomes for students and so should be addressed as a safeguarding concern as set out in this policy. We also recognise that if we fail to challenge extremist views, we are failing to protect our students.

Therefore, at ACM we will provide a broad and balanced pastoral education programme, delivered by skilled professionals, so that our students understand and become tolerant of difference and diversity. We will ensure that they feel valued and not marginalised. By delivering a broad and balanced pastoral education programme, augmented by the use of

external sources where appropriate, we will strive to ensure our students recognise risk and build resilience to manage any such risk themselves where appropriate to their age and ability but also to help them develop the critical thinking skills needed to engage in informed debate.

Any prejudice, discrimination or extremist views, including derogatory language, displayed by students or staff will always be challenged and where appropriate dealt with in accordance with our student behaviour management policy or through our fitness to study policy.

As part of wider safeguarding responsibilities, ACM staff will be alert to:

- The importance of promoting British Values through both the curriculum and as part of the pastoral development education programme..
- Disclosures by students, of their exposure to the extremist actions, views or materials of others outside, such as in their homes or community groups, especially where students have not actively sought these out.
- Graffiti symbols, writing or art work promoting extremist messages or images
- Students accessing extremist material online, including through social networking sites
- Parental reports of changes in behaviour, friendship or actions and requests for assistance Partner colleges, local authority services, and police reports of issues affecting students in other colleges or settings
- Students voicing opinions drawn from extremist ideologies and narratives
- Use of extremist or ‘hate’ terms to exclude others or incite violence
- Intolerance of difference, whether secular or religious or, in line with our Equalities Policy, views based on, but not exclusive to, gender, disability, homophobia, race, colour or culture
- Attempts to impose extremist views or practices on others
- Anti-Western or Anti-British views
- Emerging groups such as INCELS or MUUR

ACM will closely follow any locally agreed procedure as set out by the Local Authority and/or Safeguarding Children’s Board’s agreed processes and criteria for safeguarding individuals vulnerable to extremism and radicalisation. We will actively engage with the police, and regional DfE area Prevent Co-coordinators.

At ACM we reserve the right to initiate our own internal policies in light of a safeguarding concern that may put the student, other students, or staff at risk of harm.

We will help support students who may be vulnerable to such influences as part of our wider safeguarding responsibilities and where we believe a student is being directly affected by extremist materials or influences. We will ensure that we follow procedure as directed by local authority, Prevent coordinator, police, social care and any other agency necessary to safeguard and support that student and others. Additionally, in such instances our internal policies may be actioned to prevent risk of harm.

By delivering a broad and balanced pastoral education programme, augmented by the use of external sources where appropriate, we will strive to ensure our students recognise risk and build resilience to manage any such risk themselves where appropriate to their age and ability but also to help them develop the critical thinking skills needed to engage in informed debate.

1. Purpose and Scope

1.1 This policy outlines ACM's approach towards to meeting expectations with regard to the PREVENT Duty.

1.2 The Counter Terrorism and Security Act 2015 places a duty on all RHEBs (Relevant Higher Education Bodies) to have due regard to the need to prevent people from being drawn into terrorism. This legislation is given specific statutory force through the Prevent duty guidance for higher education institutions in England and Wales, referred to as the 'Prevent Duty'.

1.3 The Prevent duty guidance for England and Wales (2023), issued on September 7, 2023, under Section 29 of the Counter Terrorism and Security Act 2015, serves as statutory guidance for specified authorities in England and Wales. Subject to Parliamentary approval, this guidance is set to become effective on December 31, 2023.

1.4 Its primary purpose is to offer a framework for preventing individuals from engaging in terrorism or supporting such activities, while also addressing the rehabilitation and disengagement of those already involved in terrorism.

Until the new guidance comes into effect, specified authorities in England and Wales must continue to adhere to the Prevent duty guidance for England and Wales (2015). This 2015 guidance provides the existing framework for these authorities to fulfill their Prevent duty obligations.

1.5 This Policy applies to all staff, students, and third parties of ACM and to all Academy-controlled activities undertaken in the UK.

2. Policy Statement

Legal Context and ACM Approach

2.1 The underlying considerations adopted by ACM in implementing the Prevent Duty are:

- a commitment to the safety and wellbeing of our staff and students and all who interact with ACM, including not being victims of, or complicit with any activities linked to radicalisation;
- preserving equality and diversity as foundations of ACM life, whilst ensuring these values are not threatened;
- supporting campus cohesion and harmonious relations across all parts of ACM community;
- that the requirements described in this Policy are implemented in a proportionate and risk-based manner, relevant to the local context in which ACM campus is based.

2.2 The legal definition of terrorism as defined in the Terrorism Act 2000 applies to the Prevent duty. ACM acknowledges and upholds the position that the definition of terrorism in the Terrorism Act is broad, in describing it as "the use or threat of action which involves serious damage to property; or endangers a person's life; or creates a serious risk to the health and safety of the public or a section of the public; or is designed seriously to interfere with or disrupt 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, racial or ideological cause."

2.3 Terrorism may take the form of extremist behaviour and acts. The statutory Prevent Duty Guidance defines extremism 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 and calls for the death of members of our armed forces, whether in this country or overseas".

2.4 In accordance with this definition, ACM considers that extremist ideologies, and those who express them, undermine the principles of freedom of speech and academic freedom.

2.5 Office for Students is the principal regulator of ACM and has established a monitoring framework to assess compliance of all Higher Education Providers with the Prevent Duty. ACM has a legal duty to provide reports and evidence of its compliance with the Prevent Duty to OfS, including serious issues which arise related to ACM's Prevent responsibilities. OfS's role does not extend to investigating terrorism-related incidents on campus.

Arrangements to demonstrate due regard to the Prevent Duty

Working in Partnership

2.6 ACM will work in close partnership with relevant partners including the FE/HE Regional Prevent Coordinator, local police, local authorities including Multi Agency Safeguarding Hubs, academic partners and establishment of formal links for sharing good practice in approaches, and information where this is a necessity.

Leadership and Governance

2.7 The Executive has a statutory responsibility to ensure ACM satisfies the requirements of the Prevent Duty, with leadership and implementation delegated to the Senior Management Team for Prevent-related matters.

2.8 The Senior Management Team has appointed 'Leads' to oversee implementation and review of Safeguarding and for Prevent Duty.

Risk Assessment and Action Plan

2.9 ACM has developed a Prevent Risk Assessment of how and where students and staff might be drawn into terrorism, including violent and non-violent extremism, and an embedded action plan to mitigate risks. The Risk Assessment addresses the adequacy of institutional policies and arrangements regarding the campus and student welfare, including equality and diversity and the safety and welfare of students and staff. The Prevent Risk Assessment and embedded action Plan is coordinated by the Prevent Lead.

External Speakers and Events

2.10 ACM has implemented a Policy for External Speakers and Events to reflect the Prevent Duty responsibilities. The Policy sets out the arrangements for managing events on campus and institution-branded events taking place off campus. The Policy is set within the context of the statutory responsibility of ACM to secure freedom of speech. A risk-based approach to the assessment of events will be taken and this may require modification or adjustments to the content of, or arrangements for, events to mitigate risks in respect of the Prevent duty. Whilst in exceptional circumstances only, the right is reserved by ACM to prohibit events where speakers promote or seek to incite hatred of, or violence against others.

Welfare and Pastoral Care

2.11 ACM has a range of services for welfare and pastoral care through the Student Services (for students) and Human Resources department (for staff) . Whilst ACM does not

have a specific campus chaplaincy service, guidance regarding local services is made available.

Staff Training

2.12 ACM has accessible training materials available to academic and professional services staff outlining the requirements of the Prevent Duty. Training is delivered to all staff to aid awareness of the Prevent duty and its requirements, and the arrangements that ACM has in place to seek to prevent staff or students from being drawn into terrorism or victims of it.

2.13 ACM is committed to the ongoing training and development of staff through the provision of approved CPD activity, 'train the training' events and seminars.

IT Networks

2.14 ACM has in place various web-filtering mechanisms to ensure that its IT networks or equipment cannot be used by staff or students to access, support, promote or facilitate harmful content, including extremism-related material, unless this is for bona fide teaching and research purposes as approved by ACM.

2.15 ACM is committed to engaging with its students in relation to the new Prevent duty requirements and will work with the Students council in this regard. This engagement includes collaboration and consultation on Prevent duty policy requirements as developed and delivered by ACM, representation of Student Union Officers and the Senior Management Team, and ongoing dialogue to ensure that the arrangements between both parties are joined up and effective.

Referral and Reporting

2.16 ACM's implementation of the Prevent duty is not to challenge or re-shape the current relationship between staff and students, or between any other stakeholders who make up the community. Instead the focus is that, in the rare event that a member of our community – be it a staff member, student, or anyone else connected with ACM – has a serious concern that someone else in our community is potentially being drawn into violent extremism or terrorism, they know where to seek advice and what to do with that concern.

2.17 When a concern is raised about an individual in line with the process following this paragraph, we will respond sensitively and appropriately, mindful of the fact that some of the factors which may appear as signs of a person's potential radicalisation might, in fact, be signs of a wide range of other support needs on the part of that individual. ACM therefore recognises the difficulties in defining attitudes and behaviours which may suggest someone has been, or is being, drawn into terrorism but would encourage concerns to be reported as outlined below.

2.18 Where an individual is thought to be at imminent risk of harm to themselves or others, the emergency services should be called first (999) and then ACM Safeguarding Lead (01483 910197) to ensure follow-up action is coordinated.

2.19 For Prevent-related concerns in relation to students where there is not perceived to be an immediate threat to the individual concerned or others, the Prevent Lead should be contacted directly.

2.20 The Prevent Lead will gather information in relation to the referral and undertake an assessment to determine if there may be cause for concern in relation to the Prevent Duty. The Prevent Lead may seek guidance and advice from the Regional Prevent Coordinator

when undertaking this initial assessment. For any matters of immediate concern may be referred directly to the local police to each campus (999).

2.21 The Regional Prevent Coordinator for London and the South East region is:

Name: Alamgir Sheriyar

Phone: 0207 974 5828

Email: alamgir.sheriyar@camden.gov.uk

2.22 The Regional Prevent Coordinator for the West Midlands region is:

Name: Hifsa Haroon-Iqbal

Phone: 07872 941129

Email: hifsa.iqbal@birmingham.gov.uk

2.23 The Regional Prevent Coordinator for the London region is:

Name: Jennie Fisher

Phone: 07880 469588

Email: jennie.fisher@education.gov.uk

Source: http://www.safecampuscommunities.ac.uk/guidance/regional-coordinators

2.24 Where there is a cause for concern the Prevent Lead will make prompt contact with the regional Multi-agency Safeguarding Hub (MASH), and work to ensure adequate safeguards are implemented as part of a coordinated approach as determined by the agency.

Surrey Multi-Agency Safeguarding Hub (MASH)

2.25 The MASH is based at Guildford Police Station and combines Children's Service social workers, Adult's Service social workers, and health and police staff.

Opening Hours: Monday to Friday from 9am to 5pm

(outside of these hours the Surrey Police should be contacted through 999)

Phone: 0300 470 9100

Email: mash@surreycc.gov.uk

Birmingham City Council Multi-Agency Safeguarding Hub (MASH)

2.26 The MASH includes partners from our Children's Services, West Midlands Police, and Birmingham Community Healthcare NHS Trust

Opening hours: Monday to Thursday: 8:45am to 5:15pm

Friday: 8:45am to 4:15pm

Phone: 0121 303 1888

Emergency out-of-hours:

Telephone: 0121 675 4806

Email: MASH@birmingham.gcsx.gov.uk

Lambeth Council Multi-Agency Safeguarding Hub (MASH)

2.27 The MASH includes partners from our Children's Services, Met Police, and Lambeth NHS Trust

Opening hours: Monday to Friday 9-5

Phone: 0207 926 5555

Web: lambeth.gov.uk

2.28 For concerns about staff where there does not appear to be an immediate threat to the individual concerned or others, the HR Manager should be contacted with details of the concern. The HR Manager will liaise with the Prevent Lead, and refer to external authorities as required.

2.29 It is recognised that allegations against, or concerns about staff and students may be referred through other routes. In turn, these may be raised anonymously, in which case these will be raised as per the relevant routes above.

2.30 ACM will ensure that the ACM student council is provided training and support in relation to the Prevent Duty and the referral of concerns to the ACM Prevent Lead.

2.31 Allegations or concerns which are raised by anonymous individuals will be investigated where there are sufficient grounds or scope to be able to do so based on the information provided.

2.32 If an allegation is made frivolously, in bad faith, maliciously, or for personal gain or revenge by a student or staff member, disciplinary action may be taken against the person making the allegation. However, no action or detriment related to employment or study respectively will be taken against any member of staff who raises a genuine concern that proves to be unfounded.

2.33 ACM will follow disciplinary procedures against any member of staff or student who is found to have committed criminal acts or any other misconduct related to terrorism, in the course of their studies or work activities, which may result in expulsion or dismissal.

2.34 ACM has a legal duty to share information – in confidence – within ACM, and with external authorities, on matters related to individuals assessed as vulnerable to being drawn into terrorism, or at risk of being complicit in terrorist activity. Confidentiality cannot be guaranteed if, as a result of an investigation, individuals are requested to participate in subsequent investigations by the statutory authorities.

2.35 A confidential record of all internal and external referrals made under this policy will be kept. In reaching any decision about external referral, ACM will have regard to its obligations under its Data Protection Policy and the General Data Protection Regulation 2018. Concerns will only be shared externally where there is a clear and compelling requirement to do so.

Related safeguarding considerations

2.36 Concerns about individuals being drawn into terrorism may raise related welfare and safeguarding considerations, due to the likelihood of increased personal vulnerability (e.g. due to the recruitment tactics employed by radicalisers) and the possibility of associated abuse. Additional referral options exist for such cases, which would be explored and agreed with external safeguarding and statutory agencies as required.

3. Responsible Parties

3.1 The policy lead is responsible for the cyclical monitoring and review of the policy in liaison with the Quality Assurance and Enhancement Manager. Updates in the legislation will be incorporated into this policy in a timely manner. The Prevent Duty Policy lead is:

- Safeguarding & Pastoral Services Manager

3.3 Implementation and compliance with the Policy is overseen by the following designated staff:

- Safeguarding & Pastoral Services Manager
- Human Resource Department
- Executive Management

4. **Reference Points**

4.1 Internal:

- Safeguarding Policy
- Safeguarding Procedure
- Critical Incident Policy
- Equality and Diversity Policy
- Health and Safety
- Staff Disciplinary Policy
- Acceptable Use of IT and E-Safety

4.2 External:

- The Prevent Duty
- Safeguarding Vulnerable Groups 2006
- Protection of Freedoms Act 2012
- Working Together to Safeguard Children 2018
- Keeping Children Safe in Education 2022
- Safe Campus Communities (http://www.safecampuscommunities.ac.uk/)

5. Date of Approval and Next Review

Version: 1.3

Approved on: 15 January 2024

Approved by: Safeguarding and Pastoral Services Manager

Next Review: August 2024