



Spurgeon's College Prevent Duty Policy

Background

As part of the Government's strategy to reduce terrorism in the UK, the Counter-Terrorism and Security Act 2015 (the Act) introduced a package of measures aimed at countering the risk of terrorism and radicalisation. Part 5 of the Act deals with the risk of people being drawn into terrorism and introduced the statutory 'Prevent' duty for a range of public and other bodies. Spurgeon's College as a provider of education became subject to the new 'Prevent' duty on 18 September 2015.

The intention of the 'Prevent' duty is to ensure that the College assesses the risks that people for whom it is responsible may be drawn into terrorism, and has suitable policies and procedures in place to mitigate those risks.

Definitions

- a. Radicalisation refers to the process by which a person comes to support terrorism and forms of extremism leading to terrorism.
- b. Safeguarding is the process of protecting vulnerable people, whether from crime, other forms of abuse or from being drawn into terrorism-related activity.
- c. Terrorism is an action that endangers or causes serious violence damage or disruption and is intended to influence the Government or to intimidate the public and is made with the intention of advancing a political, religious or ideological cause.
- d. Extremism is defined by the Government in the Prevent Strategy as:
 - i. 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.
 - ii. We also include in our definition of extremism calls for the death of members of the British armed forces, whether in this country or overseas.
- e. Extremism is defined by the Crown Prosecution Service as:

The demonstration of unacceptable behaviour by using any means or medium to express views which:

- i. Encourage, justify or glorify terrorist violence in furtherance of particular beliefs;
 - ii. Seek to provoke others to terrorist acts;
 - iii. Encourage other serious criminal activity or seek to provoke others to serious criminal acts;
 - iv. Foster hatred which might lead to inter-community violence in the UK.
- f. There is no such thing as a “typical extremist”: those who become involved in extremist actions come from a range of backgrounds and experiences, and most individuals, even those who hold radical views, do not become involved in violent extremist activity.
- g. Students may become susceptible to radicalisation through a range of social, personal and environmental factors - it is known that violent extremists exploit vulnerabilities in individuals to drive a wedge between them and their families and communities.

Specific risks faced by Spurgeon’s College

As a confessional college Spurgeon’s College has a focus on training people in Christian mission, ministry and theology. It is for this reason that we judge ourselves as being at low risk of students becoming radicalised compared to the risks of radicalisation in wider society. Admissions to institutional courses however are not limited to professing Christians and exceptionally the college has received applications from people beyond its normal catchment. This alone justifies why the College needs an understanding of what is required of the wider higher education sector in relation to the prevention of radicalisation. Further to this as has been recognised by contemporary theological analysis¹ that there is a mid-term risk of the radicalisation of Christians, particularly of an African heritage, towards a new crusade.

In order to mitigate these risks Spurgeon’s College will:

1. Manage risks and responding to events

Ensure that the College monitors risks and is ready to deal appropriately with issues which arise. It will do this through:

- Annual reviews of the College risk assessment and action plan in regard to the Prevent duty (see appendix).
- Understanding the nature of the threat from violent extremism and how this may impact directly or indirectly on the College
- Understanding and managing potential risks within the College and from external influences.
- Operating an external speaker policy.
- Responding appropriately to events in local, national or international news that may impact on students and communities.
- Ensuring plans are in place to respond appropriately to an incident within the College.

¹ Phillip Jenkins, *The Next Christendom*, 3rd edn, (Oxford: Oxford University Press,2011), pp.201-236

- Nominating a member of staff to be the Prevent Lead who will oversee the College's implementation of the prevent duty and to be point of contact for all concerns related to the Prevent duty. This member of staff will keep regular contact with the local 'Prevent coordinator' (See www.safecampuscommunities.ac.uk).
- Developing effective ICT security and responsible user policies.

2. Teaching and Learning

Provide a curriculum which promotes knowledge, skills and understanding to build the resilience of students, by undermining extremist ideology, and enabling students to develop their own opinions. This will be achieved through:

- Naturally embedding equality, diversity and inclusion and community cohesion in the curriculum.
- Promoting wider skill development such as social and emotional aspects of learning.
- A curriculum adapted to recognise local needs, challenge extremist narratives and promote loving respect of all.
- Encouraging active citizenship / participation, and enabling students to develop their own opinions.

3. Student Support

Ensure that Students are able to access suitable support. This will be achieved through:

- Establishing strong and effective student support services through pastoral tutors, chaplaincy and spiritual direction.
- Listening to what is happening in the College and the wider community.
- Giving clear information to students and staff about how to access support in College and or through community partners.
- Supporting at risk students.

4. Staff training

Ensure that staff are confident to take preventative and responsive steps working with partner professionals, families and communities. Staff will be provided with annual training which will cover:

- What radicalisation means (it is defined in the general guidance as "the process by which a person comes to support terrorism and extremist ideologies associated with terrorist groups");
- Why people may be drawn into terrorism;
- How to recognise vulnerability to being drawn into terrorism;
- What is meant by extremism (defined in the general guidance 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 the relationship between

- extremism and terrorism;
- What measures are available to prevent people being drawn into terrorism and how to challenge the extremist ideology that can be associated with it;
- How to obtain support for people who may be being exploited by radicalising influences and what action to take in response to people being drawn into terrorism, including when to make referrals to the Channel programme.

Sharing information

The College may need to share personal information about a student to ensure, for example, that a person at risk of radicalisation is given appropriate support.

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, it is important that when considering sharing personal information, the College takes 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.
- *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.

There may be some circumstances where the College identifies someone who may already be engaged in illegal terrorist-related activity. People suspected of being involved in such activity should always be referred to the police.

When a member of staff has any concerns that a student may be at risk of radicalisation or involvement in terrorism, they should speak with the designated Prevent Lead for the college before sharing any information. The College's Prevent Lead may deem it necessary for the College to take legal advice before sharing information.

The Prevent Lead for the College and the single point of contact for all concerns will be the Vice Principal (Director of Studies).

Additional contacts include the following:

- To report illegal information, pictures or videos found on the internet log on to www.gov.uk/report-terrorism.
- To report concerns call the Croydon Police Anti-Terrorist Hotline number: 0800 789 321

- If a crime is being committed or there is a threat to someone's life call 999 immediately.

Other College policies relating to the Prevent duty

The following College policies and documents relate to the implementation of the Prevent duty:

- Security-sensitive research policy
- External speakers policy
- IT usage policy
- Policy regarding Spurgeon's branded events happening off site
- Internal room booking policy
- Staff Handbook (Staff behaviour around radicalisation of students)
- Freedom of Speech and Academic Freedom policies

Document control box			
Title	Prevent Duty Policy		
Date approved	Jan 2016	Implementation date	Jan 2016
Next review date			
Version	1	Supersedes version	N/A
Approving body	Governors		
Quality Code consulted			
Member of staff responsible	Director of Studies		

Appendix: Prevent Duty annual Prevent risk assessment and action plan

Date completed:		Assessment completed by:	
Date of last assessment:		Date of next assessment:	

No	Prevent Vulnerability	Comments / Vulnerabilities identified	Action to remove or mitigate vulnerability	Who	When
1	<p>Awareness - Do the following people have a good understanding of Prevent</p> <ul style="list-style-type: none"> >The Governing body >College Leadership Team >Staff >Student Reps 				

2.	<p>Safeguarding - Do the Prevent lead, chaplaincy and student support staff recognize Prevent vulnerabilities and know what to do if they suspect that someone is being being drawn into terrorism?</p> <p>Is the Prevent lead aware of the Channel programme?</p>				
3	<p>IT Systems - What filtering/firewall systems are in place to prevent individuals from accessing extremist websites?</p> <p>Have they been tested recently, are the filtering systems up to date?</p> <p>Do they alert you if someone tries to access extremist sites, do you know what to do if someone does?</p>				

4.	<p>Site Security – Are students/staff challenged if they are not wearing ID</p> <p>How are authorised visitors managed?</p> <p>How do we identify/stop unauthorised visitors?</p> <p>How do we restrict access to the site? i.e. swipe, code entry</p>				
5	<p>Literature/posters-</p> <p>Does permission have to be granted for people to distribute leaflets?</p> <p>Do people know who to contact if they come across extremist literature?</p> <p>Do they know what extremist literature looks like?</p> <p>What happens if individuals are handing out leaflets outside the institution?</p>				

6	<p>Resources-</p> <p>When student/external groups book your rooms:</p> <p>Do you have a booking form/policy that states extremist activities must not take place?</p> <p>How do you monitor if extremist activities are taking place?</p>				
7.	<p>Safe place to discuss terrorism and extremism –</p> <p>Are staff trained to facilitate discussions on terrorism and extremism?</p> <p>Are there opportunities available to do this i.e. do you run a programme of seminars?</p> <p>Can external speakers be invited to discuss Prevent?</p> <p>Are students given the skills to challenge extremist narratives?</p>				

8.	<p>Policies & Procedures -</p> <p>What policies need to change to incorporate Prevent? (e.g. safeguarding, security & estate management, disciplinary, behaviour, room booking, external speakers)</p>				
9	<p>Information Sharing</p> <p>Are there information sharing protocols in place with the Police and Croydon Council?</p> <p>Do the Police know who to contact for any issues?</p> <p>Does the College know who to contact at the Police?</p> <p>Do other staff members know who the Prevent lead is at the College?</p>				

10	<p>Local Prevent Structures</p> <p>Is the College linked in with the local Prevent Board or regional Prevent FE/HE group?</p> <p>Does the College know who is Croydon Council's Prevent Co-ordinator?</p> <p>Awareness of key Police and regional HE/FE lead?</p>				
11	<p>Tensions</p> <p>Is the College aware of tensions in its student body?</p> <p>If so, how is the College dealing with these tensions?</p> <p>Have these tensions been exploited by any group?</p> <p>What cohesion issues does the College have?</p>				

12	<p>Prevent messaging</p> <p>How can Prevent be communicated better?</p> <p>e.g. posters, newsletters, intranet, student and staff handbooks, staff induction, internal literature</p>				
13	<p>Engagement with Student Body</p> <p>Do the student reps have an awareness of Prevent?</p> <p>Are they aware of the risks?</p> <p>Are they aware of sources of student support?</p>				
14	<p>Freedom of Speech</p> <p>Has the College revised and enhanced Codes of Practice on Freedom of Speech?</p> <p>Developed clearer guidelines on balancing freedom of speech with the need to protect vulnerable individuals?</p>				

15	<p>Policy on external speakers</p> <p>Does the College have a risk assessment framework for dealing with requests for external speakers on site?</p>				
16	<p>Staff and volunteers</p> <p>Are you vigilant to staff members and volunteers potentially radicalising students?</p> <p>Do you have policies and procedures that can handle this?</p>				

17	<p>Dealing with an incident</p> <p>Does your management plan identify a lead person to deal with terrorist related issues?</p> <p>How will you communicate with and reassure local communities, staff and students?</p> <p>Who will deal with the Press?</p> <p>How will you communicate with other FE/HE institutions locally?</p> <p>How will you identify what partnership support you may require?</p>				
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18	Any other identified issues in relation to the Prevent Duty				
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