

Policy 026: PREVENT Duty

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 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 HEFCE 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 HEFCE, including serious issues which arise related to ACM's Prevent responsibilities. HEFCE'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 HEFCE 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.

2.78 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 the 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 appropriate 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, training events and seminars.

IT Networks

2.14 ACM is 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' Union 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 501211) 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 on 01483 501211.

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 Surrey Police (999).

2.21 The Regional Prevent Coordinator for London and the South East region is:
Alamgir Sheriyar
Phone: 0207 974 5828
Email: alamgir.sheriyar@camden.gov.uk

2.22 The Regional Prevent Coordinator for the West Midlands region is:
West Mids: Hifsa Haroon-Iqbal
Phone: 07872 941129
Email: hifsa.iqbal@birmingham.gov.uk

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

2.23 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)

2.24 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)

2.25 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

2.26 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.

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

2.28 ACM will ensure that the ACM student Union officers are provided training and support in relation to the Prevent Duty and the referral of concerns to the ACM Prevent Lead.

2.29 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.

2.30 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.

2.31 ACM may 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.

2.32 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.

2.33 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 Data Protection Act 1998. Concerns will only be shared externally where there is a clear and compelling requirement to do so. □

Related safeguarding considerations

2.34 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. The Prevent Duty Policy lead

is:

- Prevent Duty Lead

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

- Prevent Duty Lead
- Human Resource Department
- Executive Management
- Senior Management Team
- Designated Safeguarding staff

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
- The Charity Commission: Safeguarding children and young people
- Safeguarding Vulnerable Groups 2006
- Protection of Freedoms Act 2012
- Working Together to Safeguard Children 2015
- Keeping Children Safe in Education 2015
- Safe Campus Communities (<http://www.safecampuscommunities.ac.uk/>)

5. Date of Approval and Next Review

Version: 1.1

Approved on: 16 Aug 2017

Approved by: ACM Accountable Officer

Next Review: 01 Aug 2018