

HCUC
PREVENTING TERRORISM AND RADICALISATION POLICY



Subject:	Preventing terrorism and radicalisation Policy
Origination date:	April 2017
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Person responsible:	Director of Curriculum, SEND, Safeguarding & Prevent
Approved by:	Senior Leadership Team
For action by:	All staff
For information to:	All staff

POLICY NO. M6/18

1.0 Background and aims

The aim of the government's *Prevent* strategy is to reduce the threat to the UK from terrorism by stopping people *becoming* terrorists or *supporting* terrorism. This is part of an overall counter-terrorism strategy called CONTEST. In the Counter-Terrorism and Security Act 2015 this has simply been expressed as "*prevent people from being drawn into terrorism*".

The government's *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.

Prevent work is intended to deal with all kinds of terrorist threats to the UK. The most significant of these threats are currently from Daesh, Al-Qa'ida associated groups, and from other terrorist organisations in Syria and Iraq. But terrorists associated with the extreme right also pose a continued threat to our safety and also there are active dissident republican groups in Northern Ireland.

The Government has defined extremism in the *Prevent* strategy 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. We also include in our definition of extremism calls for the death of members of our armed forces".

1.1 Aims

The aim of this policy is to ensure, as far as possible, is that the College (Harrow College and Uxbridge College HCUC) is fulfilling the duty in sections 26 and 29 of the Counter-Terrorism and Security Act 2015. The College (HCUC) will participate fully in work to prevent people from being drawn into terrorism and that should this occur there are procedures to deal with them.

1.2 Review

This policy will be reviewed annually.

2 The Legal Position

2.1 The Counter-Terrorism and Security Act 2015

This places a duty on colleges to have due regard to the need to prevent people from being drawn into terrorism. While this duty is not new to colleges the secretary of state has been given new powers to place specific duties on colleges. These are outlined in the [Prevent duty statutory guidance](#) (March 2016 HM government) and [Specific FE Prevent duty Guidance](#). Some of the key duties are summarized below:

Partnership: The College (HCUC) commits to active engagement from governors, senior managers, regional BIS *Prevent* Coordinators, the police and local authorities, and co-ordination through existing multi-agency forums, for example Community Safety Partnerships.

Sharing information: The College commits to share personal information with authorities to ensure, for example, that a person at risk of radicalisation is given appropriate support (for example on the Channel programme). The College commits to maintain appropriate records to show compliance with its responsibilities and in accordance with the General Data Protection Regulation 2018.

Risk assessment: The College has a risk assessment and associated action plan which assesses where and how students may be at risk of being drawn into terrorism and how the College is mitigating for this risk. The College's risk assessment is reviewed termly by both Harrow College and Uxbridge College.

Action Plan: Should the College identify a significant risk it will notify the relevant BIS *Prevent* Coordinator and others as necessary and develop a *Prevent* action plan to set out the actions to mitigate the risks.

Staff Training: The College will commit to providing appropriate training and development for principals, governors, leaders and staff. It will promote understanding of the factors that make people vulnerable to being drawn into terrorism and to challenge extremist ideas. It will also promote British Values to encourage respect and tolerance.

Welfare and pastoral care: The College has a Statement on Religious Diversity. This policy outlines the structures in place for managing prayer and faith facilities and mechanisms for managing any issues arising from the use of the facilities.

IT: The College has policies relating to the use of IT on the premises which contain specific reference to the duty. The College monitors use of IT for any concerns and acts upon this monitoring where these concerns are raised.

2.2 The Equality Act 2010 and Keeping Children Safe in Education

The Prevent duty is relevant to fulfilling other responsibilities such as the duty arising from section 149 of the Equality Act 2010.

The College, as a public body, recognises this duty placed upon it by the above Act to:

- Eliminate unlawful discrimination, harassment and victimisation and other conduct prohibited by the Act
- Advance equality of opportunity between people who share a protected characteristic and those who do not
- Foster good relations between people who share a protected characteristic & those who do not.

For further information refer to the College's Equality and Diversity Policy.

The College also has a Safeguarding and Child Protection Policy which should be referred to in conjunction with this policy.

3 Engagement with other partners including police and local authority *Prevent* Coordinators

The College is a member of the HE and FE Prevent London Region Group chaired by the prevent Coordinator for London. It is also a member of the Hillingdon/Harrow Prevent Partnership Group and is in direct contact with the Hillingdon, Ealing, Harrow and Brent Channel/Multi Agency Programme. All serious referrals are made to the Police, either through the local force or the Counter terrorism hotline shown overleaf.

4 Staff responsibilities and examples of suspicious activity

All staff are part of a multi-agency approach to protect students at risk from radicalisation. All suspicions of activity of this kind should be immediately referred to a safeguarding officer or the Head of Security.

Example indicators that an individual is engaged with an extremist group, cause or ideology include:

- Spending increasing time in the company of other suspected extremists;
- Changing their style of dress or personal appearance to accord with the group;
- Their day-to-day behaviour becoming increasingly centred around an extremist ideology, group or cause;
- Loss of interest in other friends and activities not associated with the extremist ideology, group or cause;
- Possession of material or symbols associated with an extremist cause (e.g. the swastika for far right groups);
- Attempts to recruit others to the group/cause/ideology; or
- Communications with others that suggest identification with a group/cause/ideology.

Example indicators that an individual has an intention to use violence or other illegal means include:

- Clearly identifying another group as threatening what they stand for and blaming that group for all social or political ills;
- Using insulting or derogatory names or labels for another group;
- Speaking about the imminence of harm from the other group and the importance of action now;
- Expressing attitudes that justify offending on behalf of the group, cause or ideology;
- Condoning or supporting violence or harm towards others; or
- Plotting or conspiring with others.

<http://www.homeoffice.gov.uk/publications/counter-terrorism/prevent/prevent-strategy/>

5 Management of events and speakers

The College is committed to denying access to those persons who promote extremist views that support or are conducive to terrorism. The relevant policies and procedures for this are outlined below:

- The College's Student Code of Conduct and the College's Lettings policy have clear references to the acceptable behaviour and use of facilities with regard to Prevent.

5.1 Code of Practice on Freedom of Speech

Section 43 of the Education (No 2) Act 1986: requires the College to issue and keep up to date a code of practice to be followed by members, students, and employees of the College for the organisation of meetings and other events, which are to be held on College premises, and for the conduct required of members, students, and employees of the College in connection with meetings and other events.

Staff, visiting speakers and students of the College must conduct themselves so as to ensure that freedom of speech is within the law. The College believes that a culture of free, open and robust discussion can be achieved only if all concerned avoid needlessly offensive or provocative action and language.

Any external speakers must be approved by the Director/Curriculum manager for each area and all concerns and final decisions will be the responsibility of the Designated Safeguarding Lead (DSL). In these incidences the DSL will rate the risks associated and decide on the appropriate outcome.

There should be sufficient information about the event including topics and any speakers and sufficient notice to allow for checks to be made and cancellation to take place if necessary prior to the event.

Any staff or students that become aware of any incidents or instances where off-campus events of concern are promoted on campus should be reported immediately to the DSL. This may be through a student's tutor/SPA or Curriculum manager/Head of School.

6 Fundamental British values

As part of the College's commitment to delivering the Prevent agenda students will be engaged through promotional events and tutorials to understand the dangers associated with involvement in extremism and the promotion of fundamental British values. Furthermore students will be encouraged to develop their critical thinking skills through tutorials and as part of the curriculum.

6.1 Fundamental British values are:

- Democracy
- The rule of law
- Individual liberty
- Mutual respect
- Tolerance of those of different faiths and beliefs

Extremism should not form part of the curriculum or teaching and students are encouraged to respect other people and no student is discriminated against contrary to the Equality Act 2010.

The College believes spiritual, moral, social and cultural (SMSC) standards will be strengthened by actively promoting fundamental British values and encouraging students to respect other people, with particular regard to the protected characteristics set out in the Equality Act 2010.

7 Useful Contact List

Regional Prevent Coordinators:

Erin MacGalloway

HE/FE Regional Prevent Coordinator
Telephone: 0207 974 2662
Erin.macgalloway@camden.gov.uk

Alamgir Sheriyar

HE & FE Regional Prevent Coordinator
Telephone: 0207 974 5828
Alamgir.sheriyar@camden.gov.uk

Hillingdon Prevent Coordinator: **Fiona Gibbs** (01895 277035 / Mobile 07946 714637)

Harrow Prevent Coordinator: **Samia Malik** (0208 420 9385)

Brent Prevent Coordinator: **Kibibi Octave** (0208 937 4225)

Ealing Prevent Manager: **Paul Smith** (0208 825 7590)

Anti-Terrorist Hotline: 0800 789 321

8 Useful Links

Channel: Protecting vulnerable people from being drawn into terrorism HM Government April 2015
[link](#)

Keeping children safe in education Statutory guidance for schools and colleges
September 2016 [link](#)

Prevent Risk Assessment & Action Plan 2018

Area of Responsibility	Risk/ Actions	Current Position	Impact/Actions	Responsibility for monitoring	FI	RI	L	T	Review Date
College Leadership	Key individuals are in place and responsible for the strategic oversight of the Prevent Strategy	College DSP has overall responsibility for Safeguarding and Prevent, reporting at relevant forums. Nominated Safeguarding Governor. Preventing terrorism and radicalisation policy is in place. The college's Safeguarding Group includes a focus on Prevent.		SLT/Governing Body/DSP					August 2018
	College policies and relevant documents where appropriate make reference to the Prevent Duty and recommended requirements	A range of policies have been reviewed and updated in line with recommendations and Prevent Statutory requirements.		SLT/CMT					Annually
	Prevent Duty included within the College's Risk Register	Risk is recorded as Preventing Terrorism procedures not followed resulting in risk to students and significant adverse PR for the College, which is assessed as a Medium Risk. Risk Register is reviewed by SLT. Review of security arrangements and potential lockdown arrangements being undertaken		SLT					March 2018
Strategic Partnerships	Development of links with key external partners that supports the college to meet its statutory Prevent duty.	Attendance at Harrow/Hillingdon Borough Prevent Working Group, and the London FE Prevent Network and also attends the Harrow Serious Incident Group meeting, which includes key stakeholders such as the Local Authority and Metropolitan Police. Channel contacts and LA contacts for all London Boroughs available in the policy.		DSP/SLT					August 2018
Staff Training	All new staff are expected to complete an online Prevent training programme within six weeks, In addition these staff will be expected to complete an additional 2 hour Prevent webinar or other recognised WRAP training at the next available training slot.	The current position is that all established staff have received Prevent training. HR monitor that staff have completed this training and update safeguarding committee on a termly basis. Designated safeguarding lead and other staff have undertaken the Train the Trainer WRAP session to support staff delivery.		HR/SLT					Ongoing
	All Agency staff to have completed Prevent Training	HR asks that Agency staff have undertaken Safeguarding and Prevent Training as soon as possible.		HR					August 2018

	Refresher training given to staff so that staff remain up to date with safeguarding and the Prevent Agenda	Staff training refresher every 3 years (online or face to face).		HR/DSP/SLT					August 2018
	Where possible encourage new recruits to complete safeguarding, equality and diversity and prevent training prior to starting at the college.	HR are currently working to implement this for 2018-19.		HR					August 2019
Student awareness and Pastoral care	Ensure all students have understanding of the college's duty to prevent radicalisation and extremism and promote British Values.	Tutorial sessions on The Prevent Duty, British Values and Radicalisation and Extremism prepared by the DSP and delivered by tutors/SPAs during the first 6 weeks F/T students undertaken a quiz to demonstrate their understanding with evidence of completion logged on ProMonitor Markbooks or App. ACL students are provided with a short fact sheet on the topics. Apprentices are aware of key aspects around the Prevent Duty.		SLT					April 2018
	Ensure Safeguarding and Prevent awareness is promoted around the college.	Different posters are displayed around the college promoting awareness of Safeguarding and Prevent and who to report concerns to within the college. Clear links on the Student portal.		SLT/DSP Marketing					August 2018
	Provide an online platform to provide relevant information regarding Safeguarding and Prevent	Range of relevant Safeguarding and Prevent materials on the college portal's Staying Safe Page/student support page/App. Messages and quizzes via the College app		DSP/LRC					August 2018
	Students develop key attributes that will allow them to engage safely with others, make sensible decisions and understand how to verify information online.	College attributes include aspects such as resilience and digital awareness. Embedding and developing British Values through curriculum delivery		SLT/VP					August 2018
	Deliver a range of activity within Staying Safe Week	Activity delivered December 2017.		DSTE / Learner Services Manager / Student Support manager					August 2018
College Environment	A safe Quiet Reflection Space is available for staff and students	The college has been able to set aside Quiet Reflection Space at all campuses for staff and students to undertake quiet reflection, contemplation and prayer. The rooms will remain space neutral, therefore no artefacts or		SLT/DSP/Security					August 2018

		<p>promotional materials should be stored or displayed in the allocated rooms.</p> <p>Some have been booked rooms for specific parts of the day for use and these will be open/locked by the security team, who will also help overview the rooms to ensure that they are not misused.</p> <p>It is the responsibility of all staff and students to ensure the safe and respectful use of the Quiet Reflection Space.</p>						
	Student Behaviour	<p>Work is constantly done with regards to the promotion of respect and tolerance of others with students. Key messages given at Induction and through tutorials on expectations and promoting positive behaviour are reinforced through the Student Disciplinary Policy. In addition the Successful Student handbook refers to College Values and expectations of staff and students.</p> <p>Security and Management deal quickly and effectively with poor behaviour.</p>		Directors/Security				Termly
	External Lettings	Lettings Policy clearly states our requirements for potential hirers and asks potential hirers to state the purpose of their booking.		Estates Team/Lettings Coordinator				August 2018
	Monitoring of Inappropriate Displays	Marketing responsible for the monitoring and removal of inappropriate materials displayed within the college.		Marketing/Estates				Ongoing
eSafety	Awareness of eSafety	<p>Resources relevant to eSafety included within the Student Handbook and materials linked to eSafety are on the Student Portal.</p> <p>Staying Safe Fair included exhibitors on eSafety and Cyber crime.</p> <p>Tutorial activity included to raise awareness of eSafety.</p>		DSTE/Learner Services Manager/Digital learning services manager				August 2018
	Monitoring of College Social Media	Marketing/IT responsible for the monitoring and removal of inappropriate materials displayed on Social Media or on online platforms.		Marketing/ Digital learning services manager				Ongoing
	Tutorial Activity	Tutorial Activity on eSafety delivered in December 2017, linked to the Staying Safe Activity		DSTE/CMG				Summer 2018
	Appropriate Filtering and Monitoring of online activity	The college has software which is considered to be an industry standard and most		IT Services Manager/SLT/ Digital				August 2018

		<p>proportionate response that provides good assurance of restricting access to inappropriate material online.</p> <p>Teachers and Learning Resources staff are able to use LANSchool and MyPC to monitor individual internet usage where they have a concern.</p> <p>monitoring software has been installed within the college and is set up to ensure alerts go to the relevant area</p>		learning services manager					
	Accessing Inappropriate Material	<p>Covered within the Successful Student Handbook, Student Code of Conduct and Disciplinary Policy.</p> <p>Teachers and Learning Resources staff are able to use LANSchool and MyPC to monitor individual internet usage where they have a concern.</p> <p>Monitoring software also restricts access to specific websites, however staff and students can request to IT Services access to any site wrongly classified as inappropriate.</p>		SLT/DSL					August 2018
	ICT Acceptable Use Policy	Includes reference to reflect Prevent Duty Guidance		IT Services Manager / Dir Services					August 2018

Score	Financial	Reputation	Likelihood
1	£0-£100,000	Local adverse publicity, no regulatory consequences	0% - 19%
2	£100,000 to £500,000	National adverse publicity, significant regulatory consequences	20% - 49%
3	£500,000 +	Major national adverse publicity, substantial regulatory consequences, withdrawal of large parts of SFA contract	50% - 100%

Risk scoring: <i>(Financial + Reputational x Likelihood)</i>		
12-18	Significant	High impact high probability
9-11	Contingency	
6-8	Housekeeping	
>6	Low risk	Low impact, low probability