

## DOCUMENT CONTROL SHEET

<b>REF</b>	ED-002		
<b>Title</b>	Prevent Policy		
<b>Purpose</b>	To set out the Prevent Policy for the Foundation to recognize the responsibility to prevent people being drawn into terrorism and to create and maintain a safe, healthy, and supportive learning and working environment for all students and staff.		
<b>Version</b>	2.1 APPROVED		
<b>Issue Date</b>	January 2025	<b>Review Date</b>	By January 2027
<b>Owner</b>	Simon Sadinsky		
<b>Role</b>	Executive Director - Education		
<b>Signed off by</b>	Ann Limb		
<b>Role</b>	Chair of the Board (on behalf of the Board of Trustees)		

# **PREVENT POLICY**

## **1. Purpose**

The King's Foundation acknowledges that all members of its staff have a duty under the Counter Terrorism and Security Act (2015) to have due regard to the need to prevent people being drawn into terrorism and to act positively to report concerns. The purpose of this policy is to recognize this responsibility and to create and maintain safe, healthy, and supportive learning and working environments for all students and staff.

## **2. Scope**

This Policy applies to all staff (including tutors, associates, contractors, visitors, consultants, those working under self-employed arrangements), trustees, volunteers, and students of The King's Foundation, in particular to comply with the requirements of the Office for Students, in relation to higher education students. The policy seeks to promote and ensure an awareness of the Prevent Duty within The King's Foundation including trustees, staff, volunteers and students, set out clear guidance on education events which involve external speakers, set out clear guidance on the use of faith-related facilities, clarify the approach to external communications materials in relation to the duty and reinforce guidance on the use of information technology on the premises of the Foundation and for the use of research in curriculum areas. Duties in relation to "safeguarding" are set out in a separate policy (ED-001), which refers to reporting concerns and the Prevent Policy. The Foundation takes seriously its student welfare and wellbeing responsibilities wherever operating in the world, and these are covered in any agreements with overseas centres.

## **3. References**

This policy has been created with reference to guidance provided by the Office for Students, the Charity Commission, and the Office of the Scottish Charity Regulator. The policy is intended to comply with the Counter Terrorism and Security Act (2015) and the Prevent Duty Guidance for Higher Education Institutions in England and Wales (2019). Part 5 of the Counter Terrorism and Security Act (2015) placed specific obligations on universities to "have due regard to the need to prevent people from being drawn into terrorism".

## **4. Definitions**

The government's official definition of the "prevent duty" is the legal obligation of organizations and institutions to have "due regard to the need to prevent people from being drawn into terrorism." The Prevent strategy, published by the Government in 2011, is part of an overall counter-terrorism strategy, CONTEST. The aim of the Prevent strategy is to reduce the threat to the UK from terrorism by stopping people becoming terrorists or supporting terrorism. In the Act, this has been expressed as the need to "prevent people from being drawn into terrorism." The 2011 Prevent strategy has three specific strategic objectives:

- respond to the ideological challenge of terrorism and the threat faced 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 radicalization that need to be addressed.

Channel is a multi-agency approach, which is led by the relevant local authority to help support individuals who are identified as vulnerable for a variety of reasons. It is a programme focused on providing support at an early stage, including those that are identified as being vulnerable to being drawn into terrorism. Channel aims to ensure that vulnerable adults and children of any faith (or none), ethnicity or background receive support before their vulnerabilities are exploited by those that would want them to embrace terrorism, and before they become involved in criminal terrorist activity.

This policy also recognizes the importance of providing for and celebrating the cultural, religious, and ethnic diversity of the Foundation's staff and students. It requires all staff, students, and visitors to respect the Foundation's values, be sensitive to the diversity of the Foundation community and to show respect to all sections of that community.

## **5. Responsibilities**

The Registrar of the King's Foundation School of Traditional Arts is the designated Prevent lead for the Foundation. The Prevent lead will ensure that this policy is published on the Foundation's website.

The Prevent lead will assist in the management of all incidents and will provide the main point of reference for advising and coordinating cases, consulting with external bodies where required. As a multi-site organization, each site with education provision will appoint a designated Prevent Officer, who will ensure both that all staff are fully aware of the requirements of this policy and associated procedures and that all incidents are recorded correctly and are reported.

The recruitment process across the Foundation will ensure that all new staff members, tutors, associates, and volunteers provide acceptable references and appropriate disclosures prior to taking up their appointment.

The Board of Trustees is responsible for approving the Prevent Policy and for approving the Foundation's annual accountability and monitoring return to OfS in compliance with the ongoing conditions of the Foundation's registration. The Chief Executive Officer is the accountable officer for the Foundation's approach to the "prevent duty". The Executive Director - Education is the owner of this policy with responsibility for overseeing the Policy's effective implementation and compliance.

## **6. Policy**

### **6.1 Approach**

The King's Foundation values the principles of academic freedom and general freedom of expression and recognizes it has a statutory duty to protect them. Preventing vulnerable

individuals from being drawn into terrorism is also treated as a safeguarding issue (see ED-001 Safeguarding Policy). The ability of students and staff to research, teach and debate any topic with academic freedom will not normally be fettered unless, on a case-by-case basis, a specific threat is identified. The implementation of the Policy requires the Foundation to:

- monitor and assess risks within activities undertaken by The King’s Foundation (the “Risk Assessment”);
- provide a clear framework to structure and inform our response to concerns (the “Action Plan”);
- provide staff training for those in designated (student-facing) roles.

## 6.2 Risk Assessment and Action Plan

6.2.1 As required by the prevent duty, The Foundation has developed an Action Plan which sets out the implementation of the Policy. This includes, but is not limited to:

- Implementing training procedures for staff responsible for the duty
- Ensuring all staff and students are aware of prevent reporting procedures.
- Establishing staff development sessions to inform and provide more information on the prevent duty.
- Embedding briefing on the prevent duty during induction of new staff members.
- Raising student awareness of the duty and ensuring the student handbook is up to date.

6.2.2 As required by the Office for Students, the Foundation will conduct assessments of the risk of its students being drawn into terrorism. The Policy and Resources Committee will at least annually review the risk assessment. Where any significant risk is identified, the Foundation will consider what action might mitigate the impact/likelihood of that risk crystalizing, and if necessary, include it in the Foundation’s Prevent Action Plan.

## 6.3 Staff and Student Training and Awareness

6.3.1 All members of staff should be aware of the Foundation’s responsibilities under the prevent duty. The Foundation will ensure appropriate training (provided by DfE) is available for all relevant new staff so that they can recognize those who are vulnerable to being drawn into terrorism and potential signs of radicalization, including an explanation of how to manage appropriately and sensitively any concern that may emerge. All relevant staff will then receive annual refresher training which will include reviewing their knowledge to ensure the policy and responsibilities are fully understood in practice. The Registrar for the Foundation’s School of Traditional Arts as prevent lead will record any training

attended by staff and will be responsible for the implementation of required training.

- 6.3.2 The Foundation works closely with the Student Representatives in ensuring that it provides excellent support for its students. Through regular contact with the Student Representatives, it will be ensured that students are consulted on an ongoing basis on how the prevent duty is implemented. This policy will be included in the staff and student handbooks and the policy will be submitted for discussion at the staff/student meetings.

#### 6.4 Potential Behaviour Indicators

- 6.4.1 The following behaviours can work as a guideline to help members of the Foundation community identify possible radicalisation. However, any or all do not always mean someone is being radicalised, with the exception of joining an extremist group and visiting extremist websites which is a concern but would be more of an action rather than behaviour:

- Increased social isolation.
- Approval of the use of violence to support an idea or cause.
- Racial intolerance or discriminatory behaviour towards people of different ethnicities. Unwilling to engage with people who are different. Becoming abusive to people who are different.
- Sympathising with extremist groups and ideologies. Joining or trying to join an extremist organisation.
- Visits to extremist websites. Accessing extremist online content. Increased internet/social media usage. Changing online identity. Having more than one online identity.
- Becoming increasingly argumentative with friends and family. Changes in a person's circle of friends and disinterest in old acquaintances.
- Glorifying violence or advocating extreme messages.
- Embracing conspiracy theories.
- Feeling persecuted.
- Being secretive and reluctant to discuss their whereabouts.

#### 6.5 Internal and External Referral Process

- 6.5.1 Staff should not ignore their concerns but check what they have noticed. They could speak to the student directly if appropriate or talk to colleagues to see if they share their concerns. If, after checking, the staff member identifies a potential matter of concern, or one is referred to them, they should contact their Prevent Officer for the site. (The Foundation has several sites in the UK, so a Prevent Officer has been appointed at each site, the Prevent Lead is based at KFSTA in London.) The Prevent Officer will report to the Prevent Lead to assess the concern. Members of staff should not investigate themselves. Even if they have doubts as to whether a matter is relevant or not, they should always

seek advice. However, if it is an emergency where there are immediate threats to life the police should be contacted using 999.

- 6.5.2 The Prevent Lead will carefully and sensitively consider the available evidence to assess whether the concern is Prevent relevant (and also consider whether there are any other concerns and signpost appropriately). They may seek further information from the staff member or others to verify the information provided or to help assess the level of vulnerability and welfare of the person. At this stage, the Prevent Lead will filter out any concerns that are established to be misinformed or whether although not a Prevent matter further follow up action is needed. This will include whether it is appropriate and proportionate to share the information with outside agencies because there is, on the balance of probabilities, a serious risk posed by the individual to the wider public or to that individual.
- 6.5.3 The Prevent Lead will then undertake a full assessment of risk and consideration of any further action. Regardless of this assessment, the Executive Director – Education will be informed and will decide whether it is necessary to seek external referral. At this stage, all cases will be logged as set out in the Foundation’s Safeguarding Policy. The CEO will be informed of the details of all “prevent” incidents as a matter of course, protecting any personal data as necessary.
- 6.5.4 The Prevent Lead will decide whether the concern should be passed on to the Foundation’s Head of Safeguarding, who may consult with the relevant Local Authority Prevent Officer who will decide whether a referral is appropriate. Regular liaison will take place between the Foundation leads for Safeguarding and Prevent (or their nominated persons) to ensure that both policies are being followed and any Prevent concerns are dealt with in the context of the safeguarding policy as appropriate.
- 6.5.5 The Foundation is aware of the Channel process and of the opportunities for informal and formal sharing of information with relevant authorities. The Foundation will use these when considering it is necessary and appropriate to do so in the interests of preventing people from being drawn into terrorism. Information sharing will only take place with external authorities when this is consistent with the provisions of the Data Protection Act and does not amount to an agreement to share personal data on anything other than a need based and case by case basis.
- 6.5.6 Local Prevent contacts for all areas of the Foundation are set out in Appendix 2 to this policy, this includes relevant local authority, government, and police contacts.

## 6.6 Education Events and External Speakers

- 6.6.1 The Foundation is aware that it has a duty under the Education (No 2) Act 1986 to secure freedom of speech and academic freedom within the law. The

Foundation will carry out due diligence on all speakers and where the views expressed constitute views that risk drawing people into terrorism, or are shared by terrorist groups, permission to proceed with appointing this speaker must be sought by the organizer from the Policy owner.

6.6.2 External speakers, including both in person and online, will be made aware of their responsibility to abide by the law by the staff member who booked the speaker including that they:

- must not incite hatred, violence or call for the breaking of the law;
- are not permitted to encourage, glorify, or promote any acts of terrorism including individuals, groups, or harmony;
- must not spread hatred and intolerance in the community and thus aid in disrupting social and community harmony;
- must seek to avoid insulting other faiths or groups, within a framework of positive debate and challenge;
- are not permitted to raise or gather funds for any external organization or cause without express permission of the relevant Head of the Programme.

6.6.3 The Programme Manager (who may also seek advice from the Prevent Lead) who has identified the external speaker and requested the booking is responsible for using reasonable due diligence to check the external speaker's details, group links and other connections including:

- any links with extremist or terrorist organizations;
- has previously spoken at another institution on a topic that has caused fear or intimidation;
- is accepted in mainstream as being highly controversial;
- is likely to cause harm to a specific group of staff and students;
- has links to any person or group that has been connected with any controversy of a negative or positive nature;
- has a significant profile and may attract a following that could create crowd control and health and safety issues and is from a political party during an election period.

6.6.4 In complying with the prevent duty, the Foundation will not provide a platform for any proscribed terrorist organization or encourage terrorism in any way or allow gender segregation at any event. If the booker suspects that the external speaker has extremist or terrorist links, he/she must inform the Prevent Lead who will inform the external Prevent Coordinators and the police, as necessary.

6.6.5 To promote balanced and respectful debate the Foundation will consider any of the following to mitigate any potential risk to the Foundation:

- having an independent chairperson to facilitate an event and make sure a range of viewpoints can be heard;
- filming events to deter the use of unlawful speech;

- having additional staff in place to provide security;
- ticketing an event to prevent non-student violent protest;
- reviewing any promotional materials before the event;
- contacting the DfE Prevent Regional Coordinator for London, Local Authority Prevent Officer, Counter-Terrorist police leading on Prevent, or other partners to gain more context or relevant information; or
- training staff on how to facilitate well-balanced debate.

6.6.6 Permission to use Foundation premises for education events linked to specific programmes of study, will only be granted to staff who undertake to comply with instructions in relation to the location, arrangements for and conduct of such activities, including adequate stewarding and control of entry. The details of such arrangements are agreed on in each individual case. Staff responsible for infringements of or departures from these procedures may be subject to Foundation disciplinary procedures. Staff members must follow the External Speaker Policy and Brand Guidelines, which are available to all staff, when using the Foundation's brand for off-site events. All publicity, using the Foundation's name, must be agreed to by the Executive Director – Education or Director of the School/Programme Area prior to its publication. No events shall be booked off site in the Foundation's name where an external speaker is present without the consent of the Executive Director – Education or Director of the School.

## 6.7 Pastoral Care and Faith Facilities

6.7.1 The Foundation has a wide range of education programmes so pastoral care is made available through various staff members. All long-term students will have access to a personal tutor, student representative and other designated member of staff. Personal tutors and other designated members of staff will refer to internal services (such as the Health and Wellbeing Centre) where available or provide signposting to external services as appropriate. Details of available external services are provided to all students in the relevant Student Handbook for their course.

6.7.2 The Foundation is aware of its responsibilities under The Equality Act 2010 and the inclusion of Religion and Belief as a protected characteristic and is committed to providing opportunities for staff and students to balance their faith requirements with the competing demands of work and study. The Foundation seeks to ensure that appropriate provision is made for those of any faith (or those without faith) to access appropriate facilities for pastoral care and for religious purposes on Foundation premises and expects other providers (e.g., of placements) to operate to the same standards. The provision of adequate facilities to allow groups to observe their faith are an important element of the Prevent approach. The culturally diverse nature of the Foundation must be actively celebrated and promoted to counter the threat of radicalisation from external influences.



6.7.3 As outlined in the Student Handbook available for each study programme, all students enrolling at The King's Foundation agree to a range of standards of acceptable behaviour set out in the Student Code of Conduct (ED-003) and this applies to their conduct in prayer spaces.

#### 6.8 IT facilities and access to social media

6.8.1 All computer usage must comply with the provisions of the Counter Terrorism and Security Act 2015. The Foundation will take all action required by the Act and follow any guidance issued under section 29 of the Act to meet its duties. Such action may include, but not be limited to, monitoring computer usage, and reporting any use which the Foundation considers necessary pursuant to the Act to the relevant authorities.

6.8.2 As a student or member of staff, they may have a legitimate reason to access extremist or terrorist-related materials for teaching and research purposes. If researchers access such material without informing the Foundation or if they do not adequately protect the material or if they circulate it to others, this action or lack of action could be open to misinterpretation by the authorities. This may put the researcher at risk of investigation or prosecution under counter-terrorism legislation.

6.8.3 To protect the researcher from such occurrence, they are advised to inform their tutor that they intend to access and/or store material and give an indication of the purpose of accessing/storing the material and the duration of that access/storage. The tutor will inform the IT Manager so that they have adequate information in case the Foundation is asked to explain access to websites by an external authority, linking with other partners and the police as appropriate. The tutor will not take any other action but will retain information so the researcher is protected should they ever be questioned by authorities. Tutors should refer to the University of Wales Trinity Saint David's (UWTSD) research ethics policy who validate research and MA degrees at the School of Traditional Arts. All research students will have to undergo a research ethics approval process with UWTSD at the start of their research degree so that there is a process for dealing with security-sensitive research. Security-sensitive research material will be kept off the School's student computers and will be supervised on a specially designated server supervised by the research supervisory team. This material then can be accessed easily and securely by the researcher and cannot be transmitted and exchanged. The Director of Research Programmes will be the first point of contact for internal School and police enquiries about suspect security-sensitive material associated by a research student from the School. All incoming students will undergo an IT induction at the beginning of their course and student handbooks will include an IT policy where students will be made aware of the legal risks of accessing and downloading from sites subject to the provisions of counter-terrorism legislation. As a small institution, students are not allocated a School email account. An ethics review process and securing storage of sensitive material training scheme will be put in place.

- 6.8.4 Any material must be kept secure in the same way that they might protect sensitive personal information i.e., not storing on a personal computer or laptop, not using the material for any purpose other than the purpose for which it was collected and not sharing the material with others unnecessarily.
- 6.8.5 The Foundation considers it unacceptable for its IT networks to be used in any way that supports, promotes, or facilitates terrorism. The Foundation takes the challenges presented by social media very seriously. If any misuse of the Foundation's branding on social media accounts is discovered, then action will be taken. The Foundation blocks access, using the Cisco Umbrella filtering system, to specific websites, network resources and IP addresses that provide or facilitate access to extremism materials in relation to the Foundation's Prevent duty. The system works by intercepting the DNS request from all devices connected to the network and checks the website against the policies that have been applied. The Umbrella system also blocks access to websites that are known to be hosting malware and phishing attacks. The Safe Search for search engines is also enforced which also removes pornography and other offensive content from Google, YouTube and Bing and cannot be bypassed by the user.

#### 6.9 Materials supporting terrorism

- 6.9.1 The Foundation will not permit material supporting terrorism to be displayed within Foundation premises and will remove any such material if it is found. Likewise, the Foundation will seek to ensure that its printed and electronic communications (including its website) do not contain or support terrorist material or material likely to encourage terrorism and will investigate immediately if any such instances are raised. Permission needs to be granted by the Head of Programme for students and staff to distribute leaflets both within the Foundation or handing out leaflets outside the Foundation premises.

### 7. Performance

The effectiveness of the Prevent Policy will be reviewed annually through a report to the Board by the Executive Director - Education. This will set out any concerns and issues raised under the Policy and the investigation of any issues and follow up action taken, including where there has been any involvement of any supporting authorities, external regulators, or enforcement authorities.

### 8. Document Review

This policy will be reviewed biannually by the Executive Director - Education who shall ensure that the following is considered and any recommendations for change made to the Board:

- The continuing suitability and relevance of the policy.
- The accuracy and clarity of the documented policy.
- Compliance with any current legislative/regulatory requirements.

- The effectiveness of the policy in achieving desired outcomes.
- The adequacy of training on this policy.
- Any identified areas requiring improvement.
- The requirement for updating or creation of any new written procedures, forms or other documents relating to the particular policy and removal of any obsolete documents; and
- The relevance / status / currency of any attachments / references included in any of the associated documents.

## Appendix 1 – Change history

Version	Date	Status	Comment
1.0	13/12/2022	DRAFT	Draft requested by GRG (updating current policy on YM)
1.1	20/12/2022	DRAFT	Updated following input from SS
1.2	16/01/2023	DRAFT	Updated following review by EC FOR PARC REVIEW 26/01/2023
1.2	31/01/2023	APPROVED	Approved by PARC – January 2023
1.3	15/02/2023	DRAFT	Updated in response to DfE comments
1.4	28/02/2023	DRAFT	Updated for DfE second review
1.5	10/03/2023	DRAFT	For submission to OfS for review/approval – Reviewed by PF Prevent Lead
1.6	13/03/2023	DRAFT	Submitted to OfS for review/approval in March 2023 FOR PARC REVIEW – September 2023
1.7	28/09/2023	APPROVED	Approved by Trustees.
1.8	12/02/2024	DRAFT	Resubmitted to OfS for review following comments in January 2024
1.8	29/02/2024	APPROVED	Approved by PARC – February 2024
1.9	22/04/2024	APPROVED	Amendment to contact details and additional resources in Appendix 2, plus text added to 6.6.2 and 6.8.3 following further feedback from OfS in March 2024.
2.0	12/12/2024	DRAFT	Draft review minor amends for consideration by SS
2.1	31/01/2025	APPROVED	Approved by Chair of Board of Trustees (AL)

## Appendix 2

### Local and National Prevent contacts (April 2024)

Prevent advice line 0800 011 3764

Anti-terror hotline 0800 789 321

Crimestoppers 0800 555 111

Report directly to the Police 101, 999 or online [met.police.uk](https://met.police.uk)

#### LONDON: (KFSTA and TBW)

FE/HE Regional Prevent Coordinator			
Jennie Fischer	Counter-Extremism Division 20 Great Smith Street London SW1P 3BT	M: 07880469588	<a href="mailto:Jennie.Fischer@education.gov.uk">Jennie.Fischer@education.gov.uk</a>
Local Prevent Police contact			
Police Sergeant James Walsh	3050 CT, Local Operations, NE Cluster Team 3 (Tower Hamlets/Hackney) Counter Terrorism Policing – SO15	T: 020 3276 7010 (internal: 717010) M: 07787 274 712	<a href="mailto:James.Walsh@met.police.uk">James.Walsh@met.police.uk</a>  (please note he works in strap office so will not have his mobile on him)
Local Authority Prevent contacts			
Tracey Thomas	Hackney Prevent Coordinator		<a href="mailto:tracey.thomas@hackney.gov.uk">tracey.thomas@hackney.gov.uk</a>
	Multi-Agency Safeguarding Hub	T: 020 7364 3009	<a href="mailto:Mash@towerhamlets.gov.uk">Mash@towerhamlets.gov.uk</a>
Timothy Collins	Prevent Programme Manager	T: 020 7364 3162	<a href="mailto:Timothy.Collins@towerhamlets.gov.uk">Timothy.Collins@towerhamlets.gov.uk</a>
Mace Hoque	Prevent Engagement Officer (Communities,	T: 020 7364 6221	<a href="mailto:Mace.hoque@towerhamlets.gov.uk">Mace.hoque@towerhamlets.gov.uk</a>

	Training and Safeguarding)		
Iona Karrman-Bailey	Prevent Education Officer (Schools, Colleges and Training)	M: 07759 718 962	<a href="mailto:Iona.Karrman-Bailey@towerhamlets.gov.uk">Iona.Karrman-Bailey@towerhamlets.gov.uk</a>

### **GLOUCESTERSHIRE: (HIGHGROVE)**

Local Prevent Police contact			
			<a href="mailto:Prevent@gloucestershire.police.uk">Prevent@gloucestershire.police.uk</a> or <a href="#">complete the form</a>
Local Authority Safeguarding contact			
	Gloucestershire County Council (Adult Helpdesk / Advice Helpline)	T: 01452 426868	<a href="mailto:socialcare.enq@gloucestershire.gov.uk">socialcare.enq@gloucestershire.gov.uk</a>

### **SCOTLAND: (DUMFRIES HOUSE)**

Police contact			
			<a href="mailto:PreventDeliveryUnit@scotland.pnn.police.uk">PreventDeliveryUnit@scotland.pnn.police.uk</a>
Local Authority Contacts			
	East Ayrshire North  East Ayrshire South	T: 01563 554200  T: 01290 427720	<a href="mailto:HSCPcustomerfirst@east-ayrshire.gov.uk">HSCPcustomerfirst@east-ayrshire.gov.uk</a>

## Other Useful Resources

[www.actearly.uk](http://www.actearly.uk)

Act Early campaign website that includes advice on how to spot the signs of radicalization, tips for holding conversations and details of how to report concerns.

<https://educateagainsthate.com/>

Government advice and trusted resources for schools to safeguard students from radicalization, build resilience to all types of extremism and promote shared values.

<https://www.getsafeonline.org/social-networking/online-radicalisation/>

Free, impartial information and advice for the public and small businesses on keeping safe and secure online. Contains specific sections on on-line radicalization.

<http://unesdoc.unesco.org/images/0024/002446/244676e.pdf>

A Teacher's Guide on the Prevention of Violent Extremism is a concise and practical guide for teachers and educators on how to manage classroom discussions about controversial issues with a view to preventing violent extremism. The guide contains factual information that debunks myths and misunderstands surrounding issues and presents positive messages. It also includes practical tips and recommendations on how to engage learners in meaningful conversations and debates as well as prepare and manage classroom discussions on the subject. Finally, it provides examples of materials and key references that can help teachers feel more confident in tackling the issue.