



# Prevent Duty Policy

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Category:	Policies - Safety, Security and Environment
Owner(s):	Executive Committee
Approved by:	The Board of Governors
Access:	<b>Public</b> – Anyone can view this document
Scope:	This policy applies to all staff (including contractors and volunteers), students and visitors at Fairfield School of Business (FSB)

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## 1. Policy Statement

- 1.1. Section 26(1) of the Counter-Terrorism and Security Act 2015 (“the Act”) imposes a duty on “specified authorities”, when exercising their functions, to have due regard for the need to prevent people from being drawn into terrorism. Certain higher education bodies (“Relevant Higher Education Bodies”, or “RHEBs”) are subject to the section 26 duty. RHEBs’ commitment to freedom of speech and the rationality underpinning the advancement of knowledge means that they represent one of our most important arenas for challenging extremist views and ideologies.
- 1.2. Fairfield Business School (FSB) has due regard for the need to prevent people from being drawn into terrorism and is committed to providing a secure environment for all of our students, staff and stakeholders.
- 1.3. FSB values freedom of speech and the expression of beliefs / ideology as fundamental rights underpinning our society’s values. Both students and lecturers have the right to speak freely and voice their opinions. However, freedom comes with responsibility and free speech that is designed to manipulate the vulnerable or that leads to violence and harm of others goes against the moral principles in which freedom of speech is valued. Free speech is not an unqualified privilege. It is subject to laws and policies governing equality, human rights, community safety and community cohesion.
- 1.4. FSB considers that this exploitation and radicalisation should be viewed as a safeguarding concern.
- 1.5. Our School’s Prevent Duty Policy is based on the Prevent duty guidance for higher education institutions in England and Wales.

## 2. Definitions

- 2.1. ‘Radicalisation’ refers to the process by which a person comes to support terrorism and forms of extremism leading to terrorism.
- 2.2. ‘Extremism’ is defined by the Government 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”. This definition extends to calls for the death of members of our armed forces, whether in this country or overseas.
- 2.3. Extremism may be demonstrated as behaviour which:
  - Encourages, justifies or glorifies terrorist violence in furtherance of particular beliefs;
  - Seeks to provoke others to terrorist acts;

- Encourages other serious criminal activity or seeks to provoke others to commit serious criminal acts; or
  - Fosters hatred which might lead to inter-community violence in the UK.
- 2.4. 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.
- 2.5. Individuals 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. It is vital that School staff are able to recognise those vulnerabilities.

### 3. School Ethos and Practice

- 3.1. There is no place for extremist views of any kind in our School, whether from internal sources (students, staff or directors) or external sources (School community, external agencies or individuals).
- 3.2. It is imperative that our students have a safe place where they can discuss and explore controversial issues safely and in an unbiased way and where our teachers encourage and facilitate this.
- 3.3. As a School, we recognise that extremism and exposure to extremist materials and influences can lead to poor outcomes for our students. We also recognise that if we fail to challenge extremist views we are failing to protect our students.
- 3.4. Extremists of all persuasions 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 given that young people are equipped with the knowledge, skills and critical thinking to challenge and debate in an informed way. Therefore, at FSB we will provide a broad and balanced curriculum, delivered by skilled professionals, so that our pupils are enriched, understand and become tolerant of difference and diversity and also to ensure that they thrive and feel valued and not marginalised.
- 3.5. We are aware that young people can be exposed to extremist influences or prejudiced views from an early age, which emanate from a variety of sources and media, including via the internet, and at times students may themselves reflect or display views that may be discriminatory, prejudiced or extremist or use derogatory language.
- 3.6. Any prejudice, discrimination or extremist views, including derogatory language, displayed by students, staff and visitors will always be challenged and where appropriate dealt with.

3.7. As part of wider safeguarding responsibilities, School staff will be alert to:

- Disclosures by students of their exposure to the extremist actions, views or materials of others outside of School, such as in their homes or community groups, especially where students have not actively sought these out,
- Graffiti, writing or artwork promoting extremist messages, symbolism or imagery,
- Students accessing extremist material online, including through social networking sites,
- 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

## 4. Teaching Approaches

- 4.1. We will all strive to eradicate the myths and assumptions that can lead to some people becoming alienated and disempowered, especially where the narrow approaches student may experience elsewhere may make it harder for them to challenge or question these radical influences. In our School this will be achieved by good teaching and developing a culture which brings awareness of social norms.
- 4.2. The School will ensure that all of our teaching approaches help our students build resilience to extremism and give students a positive sense of identity through the development of critical thinking skills. We will ensure that all of our staff are equipped to recognise extremism and are skilled and confident enough to challenge it.
- 4.3. We will be flexible enough to adapt our teaching approaches, as appropriate, in order to address specific issues and to become even more relevant to the current issues of extremism and radicalisation.
- 4.4. The School will promote the fundamental British values of democracy, the rule of law, individual liberty and mutual respect and tolerance for those with different faiths and beliefs. We will teach and encourage students to respect one another and to respect and tolerate difference, especially those of a different faith or no faith. It is indeed our most fundamental responsibility to keep our students safe and prepare them for life in modern multi-cultural Britain and globally.

## 5. External Speakers

- 5.1. At FSB we encourage the use of external speakers to enrich the experiences of our students. However, we will positively vet those external agencies, individuals or speakers who we engage to provide such learning opportunities or experiences for our students.
- 5.2. Such vetting is to ensure that we do not unwittingly use agencies that contradict each other with their messages or that are inconsistent with, or are in complete opposition to the School's values and ethos. We must be aware that in some instances the work of external agencies may not directly be connected with the rest of the School curriculum so we need to ensure that this work is of benefit to our students.
- 5.3. For specific information and guidelines about inviting External Speakers refer to the External Speakers & Events Policy. Speakers can be invited and organised by any staff member or a registered student by following the External Speakers and Events Policies guidelines and procedure.

## 6. Web Filtering

- 6.1. FSB uses third-party firewalls and security features to actively track and block access to extremist material, and to alert the Prevent Leads and Coordinators to students or staff whose browsing behaviour may indicate they are at risk of radicalisation.
- 6.2. The Secure Web Gateway uses real-time filtering to ensure it is up to date, rather than relying on URL blocklists, and its safeguarding suite blocks and reports access to content from seven category rulesets including most importantly hate & discrimination, violence, illegal, radicalisation, suicide and self-harm. Alerts are immediately sent to the IT department by the firewall when content classified under one of these rulesets is accessed and this can be traced by IP address and log-in details to a specific computer and user. Where the content accessed flags up a Prevent risk, such as accessing extremist websites or forums, the IT department will make a Prevent report following the process set out in paragraph 11 below. Safeguarding risks such as suicide or self-harm, will likewise be reported to the Designated Safeguarding Officers.
- 6.3. FSB does not envision any of its current courses offering justified access to sites in these categories for legitimate research or study. However, should such a requirement arise, specific authorisation must be requested from the Principal or Prevent Lead along with fully evidenced written justification as to why access to restricted content is required. The Prevent Lead and Principal will discuss the request and make a decision which shall be final.
- 6.4. The use of mobiles, tablets laptops by staff and students over Wi-Fi (BYOD) is restricted to three domains that are subject to web-filtering and reporting through Smoothwall in the same way as LAN connected desktops.

## 7. Risk Reduction

- 7.1. The General Counsel, Regional Prevent Coordinators and Designated Safeguarding Leads will assess the level of risk within the School and put actions in place to reduce that risk. The risk assessment may review staff, student and board members' training and knowledge of the prevent duty, IT and cyber-security, campus or premises security, external speakers, freedom of expression, information sharing, student unions or organisations and welfare, pastoral and chaplaincy support. The School will screen staff, visitors and volunteers to ensure that they do not deliver messages of extremism or radicalisation.

## 8. Responsibilities

- 8.1. Our School, like all others, is required to identify a Prevent Single Point of Contact (SPOC) and a Designated Prevent Lead (DPL) who will be the lead within the organisation for Prevent matters. The responsibilities of the Prevent Lead are described in Appendix 2.
- 8.2. The DPL at FSB will be the General Counsel (Brikena Muharremi). Additionally, each campus will have a Campus Prevent Lead, who reports to the DPL. The DPL and Campus Prevent Leads will engage where appropriate with all external agencies, including the Police, Local Authorities, and Regional Channel Coordinators.
- 8.3. Staff at FSB will be alert to the fact that whilst extremism and radicalisation is broadly a safeguarding issue there may be some instances where a student may be at direct risk of harm or neglect. For example, this could be due to students displaying risky behaviours in terms of the activities they are involved in or the groups they are associated with.
- 8.4. Therefore, all staff working at FSB (including visiting staff, volunteers and contractors) are required to report instances where there is potential risk of harm or neglect or if they have concerns that a student or a member of staff may be at risk of radicalisation or involvement in terrorism. They should speak with the DPL. For staff based at satellite campuses, they should report any Prevent concerns to their Campus Prevent Lead.
- 8.5. Maintaining a safe environment in FSB's physical and virtual facilities is imperative. To that end, all stakeholders need to be alert to potential threats and fully observe the guidelines of this policy and associated documentation in order to mitigate negative effects and detrimental consequences.

## 9. Reporting Process

9.1. Prevent concerns can be raised by any staff member or student by:

- sending a completed Radicalism and Extremism Concern form (that can be found on the FSB Connect portal);
- post (including anonymously) marked for the attention of the Prevent Lead to

Fairfield Business School (Central Office)

2<sup>nd</sup> Floor, Memo House,

Kendal Avenue

Park Royal

W3 0XA

email to: Designated Prevent Lead [Brikena.muharremi@fairfield.ac](mailto:Brikena.muharremi@fairfield.ac) or to the Dean of the campus where there is a concern

9.2. Alternatively, staff or students may approach the Prevent Leads in person for a discreet meeting or raise Prevent concerns in the course of disciplinary, complaints/grievance or safeguarding procedures. IT may also refer Prevent concerns through this procedure as a result of a firewall alert as set out at paragraph 6 of this Policy.

9.3. A disciplinary matter or complaint will automatically be referred to the DPL where it reveals a potential Prevent concern – e.g. identity fraud or excessive absences that raise concerns about who a student is associating with, or complaints/disciplinary issues concerning racist/homophobia/Islamophobia/anti-Semitism. Disciplinary/grievance/complaints meetings in such cases will usually be chaired by the DPL or Campus Prevent Lead.

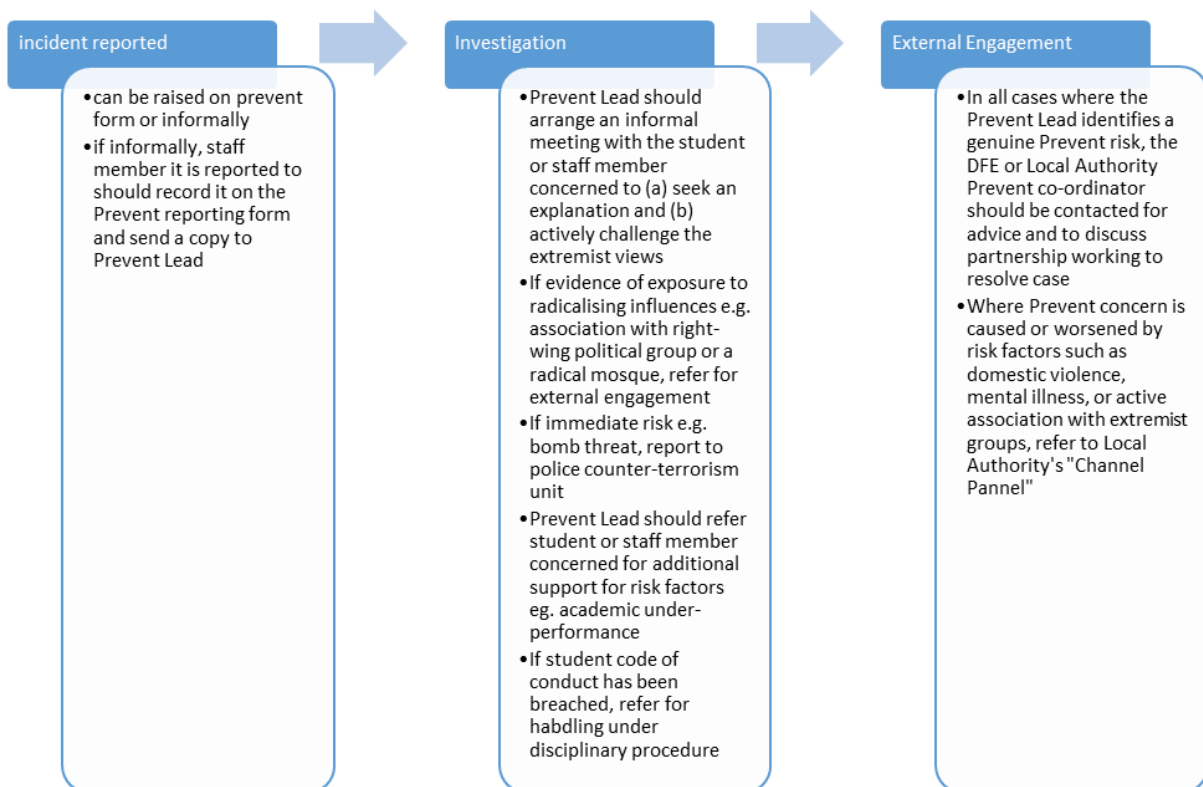
9.4. Where a Prevent concern is raised with a Prevent Lead, they should arrange an informal meeting with the student or staff member who is the subject of the concern, in order to get an explanation and to challenge any extremist views. This meeting should take place as soon as possible after the report is received and within 10 working days from the day when the report is received.

9.5. The key responsibility of the Prevent Lead in investigating a Prevent case is to (a) identify the underlying cause or explanation for the behaviour, (b) challenge the extremist views and (c) identify whether the student or staff member needs to be referred for additional support or to the Channel.

9.6. Where, as in most Prevent cases, there is an overlap with safeguarding or the general welfare of the student or staff member concerned, the Designated Safeguarding Officer should be consulted and should attend the meeting.



- 9.7. Where the informal meeting identified a genuine Prevent risk, the Prevent Lead should contact the Local Authority Coordinator or DfE Regional Coordinator for advice on how to proceed and to notify them of the incident. Where appropriate, a Channel Referral should be made through the Local Authority Designated Officer.
- 9.8. Prevent risks should be treated primarily as a welfare and safeguarding issue, rather than a disciplinary one. However, where there is an imminent terrorism threat, violence, or illegal activity, the Police should be called on the Counter-Terrorism hot-line or 999.
- 9.9. Suspension and student or staff disciplinary processes should only be used where the Prevent case is genuinely violent, disruptive or poses an immediate risk of radicalisation for other staff or students, for example where:
- The bullying is motivated by extremist ideology
  - The person in question is preaching or otherwise disseminating extremist materials on campus
  - The violence is motivated by extremist ideology
  - The person in question is accessing extremist material from FSB computers



## 10. Channel Referral

- 10.1. 'Channel' is the safeguarding process which takes a multi-agency case management role in managing the risk of those who have been or are at harm of becoming radicalised. Regional Channel Coordinators are responsible for providing support and expert advice to all police forces and local authorities across the region. The DPL will discuss cases referred to him/ her as Prevent concerns with the Designated Safeguarding Officers, and where appropriate the Regional Channel Coordinators, and decide whether it is appropriate for FSB to refer the case to Channel.
- 10.2. Each Campus Prevent Lead will make contact annually with their police Prevent Engagement Officer and DfE Regional Prevent Coordinator to establish the correct Prevent referral method for their region and to ensure contact details are up to date.

## 11. Training

- 11.1. FSB is required as part of its Prevent Duty to ensure all staff are aware of their responsibilities under the Prevent Duty to report concerns and to embody and promote fundamental British values. FSB also raises awareness of Prevent amongst its students through presentations at their induction and webinars made available on the VLE.
- 11.2. All staff are required to complete external Prevent training every two years and to provide a copy of their certificates of completion to HR.
- 11.3. Additionally, line managers and staff in key Prevent related roles (Prevent Leads, Security, HR, Designated Safeguarding Officers, Student Support, and the Work Placements Officers) must undertake 'WRAP' training provided online by JISC and prove this by providing their certificate of completion to HR.
- 11.4. In addition to the formal external training above, staff are given an annual refresher presentation at the Staff Development Training Day covering the following key topics:
  - What is Prevent?
  - Indicators of vulnerability to radicalisation
  - The process of radicalisation
  - External speaker screening process
  - FSB's internal reporting processes and key contacts

## 12. Review

- 12.1. This Policy will be reviewed annually by the School's Executive Committee. Changes to it will be ratified by its Board of Governors.
- 12.2. The Risk Assessment and Action Plan is reviewed in August each year at the end of each OfS Prevent Reporting Period (1<sup>st</sup> August – 31<sup>st</sup> July) and approved by the Board of Governors during the general policy review.

## Appendix 1 - Indicators of Vulnerability to Radicalisation

### Indicators of vulnerability might include:

- Identity Crisis – the person is distanced from their cultural / religious heritage and experiences discomfort about their place in society;
- Personal Crisis – the person may be experiencing family tensions, a sense of isolation and low self-esteem. They may have dissociated from their existing friendship group and become involved with a new and different group of friends. They may be searching for answers to questions about identity, faith and belonging.
- Personal Circumstances – migration, local community tensions and events affecting a person's country or region of origin may contribute to a sense of grievance that is triggered by personal experience of racism or discrimination or aspects of Government policy.
- Unmet Aspirations – the person may have perceptions of injustice, a feeling of failure or rejection of civic life.
- Experiences of Criminality – which may include involvement with criminal groups, imprisonment and poor resettlement / reintegration.
- Special Educational Need – the person may experience difficulties with social interaction, empathy with others, understanding the consequences of their actions and awareness of the motives of others.

However, this list is not exhaustive, nor does it mean that all young people experiencing the above are at risk of radicalisation for the purposes of violent extremism.

### More critical risk factors could include:

- Being in contact with extremist recruiters;
- Accessing violent extremist websites, especially those with a social networking element;
- Possessing or accessing violent extremist literature;
- Using extremist narratives and a global ideology to explain personal disadvantage;
- Justifying the use of violence to solve societal issues;
- Joining or seeking to join extremist organisations;

- Significant changes to appearance and / or behaviour;
- Experiencing a high level of social isolation resulting in issues of identity crisis and / or personal crisis.

## Appendix 2 - Roles and responsibilities of the single point of contact (Designated Prevent Lead (DPL))

The DPL and Regional Prevent Co-ordinator are responsible for:

- Ensuring that staff of the School are aware of him/ her as the DPL in relation to protecting students from radicalisation and involvement in terrorism
- Maintaining and applying a good understanding of the relevant guidance in relation to preventing students from becoming involved in terrorism and protecting them from radicalisation by those who support terrorism or forms of extremism which lead to terrorism
- Raising awareness about the role and responsibilities of FSB in relation to protecting students from radicalisation and involvement in terrorism
- Raising awareness within the School about the safeguarding processes relating to protecting students from radicalisation and involvement in terrorism
- Acting as the first point of contact within the School for case discussions relating to students who may be at risk of radicalisation or involved in terrorism
- Sharing relevant additional information in a timely manner.

## Appendix 3 - Risk Assessment

As with other higher education institutions, FSB is required to carry out a risk assessment of where and how its students and staff are at risk of being drawn into violent extremism. This includes exposure to an environment of non-violent extremism that may foster acceptance or encouragement of violent extremism.

In carrying out this Risk Assessment, the following are considered:

- Institutional policies
- Policies and procedures regarding the campus and student welfare, including equality and diversity and the safety and welfare of students and staff
- IT policies
- Policies and procedures concerning the physical management of the School estate, including policies and procedures for events held by staff, students or visitors and relationships with external bodies and community groups
- Staff, student and board members' training and knowledge of the Prevent duty
- Partnership and leadership
- External speakers and events
- Freedom of speech
- Staff training
- Welfare and pastoral care/chaplaincy support
- Student Unions/ organisations



## Version Tracking:

Version	Author / revisions by	Changes summary	Approved by	Date
1.0 - 3.1	Designated Prevent Lead Principal	First iterations and subsequent review	Executive Committee	Sep 2016 Sep 2017 Sep 2018
3.2 – 3.3	Quality Audit Manager Designated Prevent Lead	Minor revisions; updated contact information and web filtering; document formatting applied;	Board of Governors	Sep 2019
3.4	Quality Audit Manager Designated Prevent Lead	Annual review and update	Board of Governors	Sep 2020
3.5	Quality Audit Manager Designated Prevent Lead	Annual review and update; contact information updated	Board of Governors	Sep 2021
4.0	Designated Prevent Lead Quality Unit	Document retitled 'Prevent Duty Policy'; minor changes to introduction, new formatting and branding applied.	TBC	Sep 2022

**Date of next review:** September 2023