

PREVENT DUTY POLICY



1.0 INTRODUCTION

- 1.1 Escape Studios ("Escape") is required under the Counter-Terrorism and Security Act 2015 ("the Act") to 'have due regard to the need to prevent people from being drawn into terrorism' ("the Prevent Duty").
- 1.2 Under section 29, it must have regard to guidance issued by the Home Secretary. The Prevent Duty Guidance for higher education institutions in England and Wales came into effect on 18 September 2015 following approval by Parliament.
- 1.3 This document sets out how Escape complies with the Prevent Duty.
- 1.4 Escape takes seriously its responsibility to ensure the safety and wellbeing of students, staff and the wider community and as part of this wishes to do all that it can to prevent any member of the Escape community from being drawn into terrorism.
- 1.5 Escape also has a responsibility to protect academic freedom and general freedom of expression.
- 1.6 The key member of staff responsible for ensuring that Escape complies with the Prevent Duty is the Director of Regulation and Compliance, liaising with the DfE regional Prevent Co-ordinator and other local and regional partners.

2.0 SCOPE

- 2.1 The Prevent Policy applies to all staff, students and visitors of Escape.
- 2.2 Escape will liaise and work with its Students Association with regards the implementation of this Policy.

3.0 RISK ASSESSMENT AND ACTION PLAN

- 3.1 As required by the Prevent Duty, Escape will devise and maintain an assessment of the risk of our students being drawn into terrorism. The Risk Assessment is devised and maintained by the Director of Regulation and Compliance.
- 3.2 The Risk Assessment will be reviewed at least annually by the Executive Team and changes to the risk will be reported to and considered by the Executive Team.
- 3.3 The Risk Assessment and Action Plan will be reported to the Governing Body at least annually.

4.0 EXTERNAL SPEAKERS

- 4.1 The following applies to all events that utilise any Escape resources or are in any way branded or affiliated to Escape. It includes events held off site.

4.2 Higher Education providers have a duty under the Education (No. 2) Act 1986 to secure freedom of speech for its employees, students and visiting speakers. However; in complying with the Prevent Duty Escape will not:

- Provide a platform for any proscribed terrorist organisation or encourage terrorism in any way;
- Allow gender or religious segregation at any event it organises or at events held on its premises.

4.3 Escape expects that speakers shall:

- Not act in breach of the criminal law.
- Not incite hatred or violence or any breach of the criminal law.
- Not encourage or promote any acts of terrorism or promote individuals, groups or organisations that support terrorism.
- Not spread hatred and intolerance.
- Not discriminate against or harass any person or group on the grounds of their sex, race, nationality, ethnicity, disability, religious or other similar belief, sexual orientation or age.
- Not defame any person or organisation.
- Not raise or gather funds for any external organisation or cause without express permission of Escape.
- Present ideas and opinions, in particular those that may be contentious or potentially offensive, in the spirit of academic debate, being open to challenge and question.
- Follow Escape's policy on and instructions relating to health and safety.

4.4 **Staff and students who wish to invite an External Speaker must therefore consider the following before making an invitation or any advertisement of an event:**

- **Question 1:** Has the speaker previously been prevented from speaking at Escape or another University or similar establishment or previously been known to express views that may be in breach of the Counter-Terrorism and Security Act 2015 Act?
- **Question 2:** Does the proposed title or theme of the event present a potential substantial risk that views/opinions expressed by speakers may be in breach of the Act?
- **Question 3:** Is the proposed speaker/theme likely to attract attendance from individuals/groups that have previously been known to express views that may be in breach of the Act?

4.5 **If any the answers to any of the above questions are 'Yes' then the organiser must refer the matter immediately to the Director of Regulation and Compliance** and no invitation or advertisement may be made until confirmation has been provided in writing from the Director of Regulation and Compliance that the event may proceed.

4.7 Students wishing to book Escape space for events must do so through the Student Services office. Requests will go to the Director of Registry and Student Services who will consider the above questions, referring to the Director of Regulation and Compliance where necessary. The Director of Regulation and Compliance will keep a record of all referrals and any action taken. Where an organiser disagrees with the decision, then they may refer it to the Principal. The decision of the Principal is final.

5.0 SECURITY SENSITIVE RESEARCH

- 5.1 Escape currently has no plans for students or staff to be engaged in security sensitive research. In the event that it were to be proposed then a full ethical review would be required before approval via Academic Board.

6.0 STAFF TRAINING

- 6.1 Escape will carry out training on a regular basis for all relevant staff so that they can recognise those who are vulnerable of being drawn into terrorism and potential signs of radicalisation. It will include an explanation of how to handle appropriately and sensitively any concern that may emerge.

- 6.2 Escape will utilise external sources of training, information and guidance such as:

<http://www.support-people-vulnerable-to-radicalisation.service.gov.uk/portal#awareness-course>

as well as developing its own internal training and guidance for staff.

- 6.3 The Prevent Duty will be highlighted in key induction and training events for relevant new or visiting staff.
- 6.4 Information about this Prevent policy will be included in Student Handbooks and information events held for students during Welcome Week.

7.0 PASTORAL CARE

- 7.1 Pastoral care is available to students in a variety of ways. All students have a Personal Tutor. Specialist support is provided through Student Services.

8.0 FAITH FACILITIES

- 8.1 Escape is a secular organisation and does not provide prayer facilities. Student Services maintains a list of local faith facilities. There is a quiet room at the 190 High Holborn site. Escape does not have a Chaplaincy.

9.0 IT NETWORKS

- 9.1 The College considers it unacceptable for its IT networks to be used in any way that supports, promotes or facilitates terrorism. Students must not use the Escape IT infrastructure to create, download, store or transmit unlawful material, or material that is indecent, offensive, defamatory, threatening or discriminatory.
- 9.2 Escape has implemented web filtering on its Wi-Fi and academic networks.
- 9.3 Escape has considered the costs and likely benefit of implementing active monitoring of use of its networks with a view to detecting attempts to access prohibited sites. As a result of this consideration, it has concluded that the likely benefit or risk mitigation does not warrant the introduction of active monitoring. This position will be kept under review.

10.0 ESTATE

10.1 Staff responsible for the security of the buildings which Escape permanently occupies are made aware of Escape's obligations under the Prevent Duty through staff training sessions.

10.2 In general the security of the Estate is maintained by:

- 24 hour security staffing;
- CCTV;
- Entry to buildings only via a Staff or Student ID card
- Random bag searches by Security Staff.

11.0 COMMUNICATIONS

11.1 Escape will not permit material supporting terrorism to be displayed within Escape premises and will remove any such material if it is found. Escape may also take action under its Student Disciplinary Code.

11.2 Likewise, Escape will seek to ensure that its printed and electronic communications do not contain or support terrorist material or material likely to encourage terrorism and will investigate immediately if any such instances are raised.

12.0 SOCIAL MEDIA

12.1 Any branded (i.e. using the Escape logo, or formally associated with Escape) social media applications or platforms (e.g. Facebook) will be monitored by the Marketing Department. Action will be taken by Escape to remove any posts etc. that do not comply with the spirit of this policy and the Act and disciplinary action may be taken.

13.0 STUDENTS' ASSOCIATION

13.1 Escape works closely with its Students' Association in ensuring that it provides excellent support to our students. The President will be included in Prevent Duty training as appropriate.

14.0 ROLES & RESPONSIBILITIES

14.1 All members of staff should be aware of Escape's responsibilities under the Prevent Duty and of the measures set out above to comply with it. Members of the Escape community who are concerned about a student or member of staff who might be at risk of being drawn into terrorism should report this to their line manager or to the Director of Regulation and Compliance.

15.0 CONCERNS ABOUT INDIVIDUAL STUDENTS OR MEMBERS OF STAFF

15.1 Where a staff member or student has a concern regarding an individual student or another staff member, then they may report it confidentially to the Director of Regulation and Compliance. The Director of Regulation and Compliance will then consider the information and any evidence and:

- Determine that there is no risk and the matter will not be taken any further or
- Contact the student to discuss the matter confidentially within 5 working days or

- Raise the matter confidentially with the College's local Prevent Duty partners (Channel Police Practitioner or Department for Education adviser) for advice and guidance and possible referral to the Channel scheme, or
- Immediately refer the matter to the Police because there are **serious** and **immediate** issues of safety to the student/staff member or others, and/or there is evidence to suggest a criminal act may be committed or has been committed. This decision would be taken only in the most serious of circumstances and only in conjunction with the Principal.

15.2 The following non-exhaustive list of behaviours and vulnerabilities could indicate a cause for concern:

- The individual's views have become increasingly extreme regarding another section of society or government policy
- They have been observed downloading, viewing or sharing extremist propaganda from the web
- They have become withdrawn and focused on one ideology
- The individual has become increasingly intolerant of more moderate views
- The individual has expressed a desire/intent to take part in or support extremist activity
- The individual has changed their routine or friendship group
- They have may become isolated from family, friends, peers or social groups.

These examples do not in themselves indicate radicalisation but may indicate a cause for concern in terms of the individual's pastoral care more generally.

16.0 DISCIPLINARY ACTION

- 16.1 Escape has procedures (Student Disciplinary Code) that provide a mechanism for dealing with alleged misconduct by students that is unlawful, intimidating, threatening or brings Escape into disrepute.
- 16.2 Escape has policies and procedures in place as part of its line management and human resources infrastructure to deal with any alleged misconduct by staff.

17.0 CREATION OF DELIVERY/ACADEMIC PARTNERSHIPS

- 17.1 Where Escape creates a partnership with another organisation it will conduct due diligence on that organisation and in so doing affirm that it would comply with the Escape Prevent Duty obligations as well as the general aims and principles of Escape. Due diligence is conducted by the Academic Affairs Office in conjunction with the Academic Board and Executive Team.

18.0 SHARING OF INFORMATION

- 18.1 Where there is a concern regarding a student or staff member then information may be shared both internally and externally. Internally, information will be shared with relevant senior managers, Programme Leaders, Personal Tutors and Support Staff as deemed appropriate by the Director of Regulation and Compliance.
- 18.2 Externally, information may be shared with Local Channel Prevent Co-ordinators, the Police or other agencies as deemed necessary and in accordance with the Data Protection Act 2018.

19.0 MONITORING OF POLICY

- 19.1 The Governing Body will receive annually a report on the implementation of this Policy. Where this Policy is changed as a result of a serious incident then the College will report the matter to the Office for Students.

20.0 RELATED POLICIES AND PROCEDURES

IT Regulations

Student Disciplinary Code

Person responsible	Deputy Vice Principal (Academic Affairs)
Approval date	June 2023
Version Number	5
Approved by	Executive Team/Governing Body
Date of next formal review	November 2023
Status (Current or Post DAP)	Current