

Name of Policy: *Prevent Duty*

RESPONSIBLE COMMITTEE: Decanal Committee

RESPONSIBLE OFFICER: Senior Dean

LINKED DOCUMENTS: College: Room Booking Policy; Safeguarding Policy; Non-Academic Staff Handbook; Graduate Handbook; Undergraduate Handbook; Fitness to study Policy.

LINKED DOCUMENTS: Other: n/a

Annual Review date: First meeting of Hilary Term

PURPOSE OF POLICY

1. The purpose of the policy is to describe how the College will meet its statutory responsibilities under the *Prevent Duty*. Including:
 - a. Identification and reporting college members and staff at risk of radicalization
 - b. Procedure for students and staff to identify individuals at risk of being radicalized
 - c. Reporting process for *Prevent* cases
 - d. *Prevent* training
 - e. Academic and non-academic staff welfare and pastoral support
 - f. Data sharing
2. The *Prevent* duty is the duty in the Counter-Terrorism and Security Act 2015 on specified authorities, in the exercise of their functions, to have due regard to the need to prevent people from being drawn into terrorism. The full Government *Prevent* Strategy can be viewed via <https://www.gov.uk>.

POLICY

3. Governing Body will ensure that it is understood by the College community as a whole, that principles of free expression, academic freedom, autonomy, confidentiality, privacy, and equality of rights, according to law, provide the overarching context within which the *Prevent* duty is to be considered; and that our *Prevent* duty strategy should be implemented in a manner that is proportionate and positively secures and protects those rights.
4. The College will ensure that the relevant members of College staff are appropriately trained in the *Prevent* duty as detailed in the College's 'Procedure for *Prevent* Training'.
5. The College will offer training to MCR and JCR officers.
6. The College will ensure that *Prevent* training remains subject to, and does not undermine, the rights of academics, students, staff and visiting speakers under existing law, including the Education (No 2) Act 1986, the Human Rights Act 1998, the Equality Act 2010 and data protection legislation.

7. The College will provide its members and staff with advice about how to identify and report those they consider may be at risk of radicalization, and encouraged to use the College's internal systems to raise any issue in confidence.
8. The College *Prevent* team members are:

President: president@sjc.ox.ac.uk
Principal Bursar: principal.bursar@sjc.ox.ac.uk
Senior Dean*: senior.dean@sjc.ox.ac.uk ***Prevent lead**
Fellow for Equality: equality@sjc.ox.ac.uk
Senior Tutor: senior.tutor@sjc.ox.ac.uk
College *Prevent* Duty Coordinator: prevent.coordinator@sjc.ox.ac.uk
9. The College *Prevent* team members will meet when necessary and the *Prevent* lead will liaise as required with the University Security Office and the University Registrar.
10. The College *Prevent* team will make every effort to avoid inappropriate referrals to the University. If an individual is highlighted as 'at risk' under the *Prevent* duty, the College *Prevent* teams will carry out an internal investigation. Any referral to the University will then be subject to a further internal review process where external advice can be sought anonymously. The University Registrar will be the single point of referral by the Collegiate University to Channel# to manage the risk of inappropriate referrals.
11. To promote transparency, the *Prevent* policy will be published on the College website.
12. Governing Body will review the operation of the *Prevent* duty annually, in consultation with student representatives.
13. Individuals wishing to complain about the operation of this *Prevent* duty within College, should do so as follows:
 - (i) Students should refer to the College Appeals Procedure, available in Student handbooks.
 - (ii) Academic staff should raise concerns with the President or Principal Bursar.
 - (iii) Non-academic staff should raise concerns with their line-manager in the first instance.

IDENTIFICATION AND REPORTING COLLEGE MEMBERS AND STAFF AT RISK OF RADICALIZATION

How to spot the signs of somebody at risk of being radicalized:

Grounds for concern

1. It is important to remember that not everybody will share the same view or opinion. Holding a different view – religious, social or political, does not mean that somebody is radical or likely to become radicalized. Grounds for concern

are when somebody with an extreme view acts or intends to act upon their view(s) in a way that is harmful to themselves or others.

2. Note - if the individual has been accessing extremist websites, there could be a good reason for them doing so, e.g. for academic or study purposes or simply for interest.

PROCEDURE FOR STUDENTS AND STAFF TO IDENTIFY INDIVIDUALS AT RISK OF BEING RADICALIZED

1. If you are a student or a member of the academic staff of the College or an Academic Visitor, you may choose to approach the Senior Dean or any other member of the College's *Prevent* team.
 - a. In order to meet the College's duty of care to students, the Senior Dean will, *if necessary*, convene a meeting of relevant College Officers and staff once per term to share information about students for whom concerns have been raised about their welfare. The purpose of the meeting will be to agree an appropriate course of action to help the individual.
 - b. Information may come to light because of a direct disclosure to a member of staff, an observation from a member of staff or Tutor, or information from a third party. All information will be treated confidentially.
 - c. In addition to the termly meeting, Fellows, Tutors and staff wishing to highlight a student who is giving cause for concern are asked to notify the Senior Dean.
 - d. The College acknowledges that there is a risk that students may be less likely to use welfare provision because they perceive it to be linked to the *Prevent* duty. To reduce this risk, the College has made all policies and procedures relating to the operation of the *Prevent* duty available on the website and will provide an annual *Prevent* training document for the students.
 - e. For further information or enquiries about this policy please contact the Senior Dean (senior.dean@sjc.ox.ac.uk).
2. If you are a member of the College's non-academic staff, you may choose to approach the Bursary Manager or a member of the College's *Prevent* team.
3. See flowchart for reporting procedure (ANNEXE 1).

REPORTING PROCESS FOR PREVENT CASES

The following is a guide for the *Prevent* team to follow when a referral is being considered.

Managing referrals:

1. When individuals at risk are identified to the *Prevent* team, a meeting will be convened to discuss the individual and to determine whether any further action is justified.
2. When the *Prevent* team are considering whether a particular individual is at risk of being drawn into terrorism or extremism, they should review the *Prevent* guidance in full. The checklist below is intended to provide a framework for discussion.
 - (i) Grounds for concern:
 - (ii) Legal risks
 - (iii) Freedom of Speech
 - (iv) Academic Freedom
 - (v) Freedom of religion and freedom of assembly
 - (vi) Right to private and family life
 - (vii) Equality Act
 - (viii) Criminal Law
 - (ix) Data Sharing / Data Protection
 - (x) Health & Safety / Duty of Care
 - (xi) Reputational risks
3. The *Prevent* team should reach a decision on how to act on a case-by-case basis. Possible outcomes include:
 - a. taking no action, on the basis that there are insufficient grounds for believing that the individual is being drawn into terrorism or because any action would be unnecessary or disproportionate to the risks;
 - b. speaking to the individual about the concerns;
 - c. offering and providing support to the student to reduce vulnerability to being drawn into terrorism; or
 - d. referring the matter on to the University *Prevent* team (ideally with consent of the individual).
5. The University Registrar will be the single point of referral by the Collegiate University to the Channel programme to manage the risk of inappropriate referrals*.

PREVENT TRAINING

The College will train individuals to meet their statutory *Prevent* duty.

Procedure for Prevent training:

1. *Prevent* training will ensure that practice remains subject to, and does not undermine, the rights of academics, students, staff and visiting speakers under existing law, including the Education (No 2) Act 1986, the Human Rights Act 1998, the Equality Act 2010 and data protection legislation.
2. The College will provide comprehensive training to the *Prevent* team[#] only appropriate groups using sector specific material from the Leadership Foundation for Higher Education. <https://www.safecampuscommunities.ac.uk/training> and/or by Conference briefing on rights protection.
3. All College Fellows, academic staff, undergraduate and graduate students will receive an electronic copy of our College-specific 'Training Document on the *Prevent* Duty', in the first week of every Michaelmas term.
4. The 'Training Document on the *Prevent* Duty' (Annexe 2) will be updated annually or more regularly if necessary.
5. An appropriate level of additional *Prevent* training will be offered to JCR and MCR presidents and the Junior Deans.
6. For support staff, e.g. porters, estates workers, scouts, a verbal briefing will be provided by line managers. The purpose of the briefing will be to highlight the reporting route when individuals are a welfare concern for any reason.
7. *Prevent* training will be refreshed as required, typically annually for key staff.

ACADEMIC AND NON-ACADEMIC STAFF WELFARE AND PASTORAL SUPPORT

The College recognises its obligations under the *Prevent* duty of providing a supportive working environment for all staff and is committed to taking specific initiatives where appropriate, including but not limited to the requirements of Government regulations.

The College will maintain handbooks for academic and non-academic staff:

- Academic handbooks will be maintained by the Senior Tutor/ HR Manager. (hr@sjc.ox.ac.uk or senior.tutor@sjc.ox.ac.uk).
- Non-academic handbooks will be maintained by the HR Manager. (hr@sjc.ox.ac.uk).

The College will provide guidelines in the academic and non-academic staff handbooks about how to identify and report individuals deemed to be at risk of radicalization.

Handbooks will be issued to all new members of staff and will be available at the College intranet (<https://intranet.sjc.ox.ac.uk>).

Amendments to handbooks will be drawn to the attention of academic staff by the Senior Tutor/HR Manager, to non-academic staff by the HR Manager, and verbally by line managers to staff.

The College acknowledges the risk that staff may be less likely to use welfare provision because they perceive it to be linked to the Prevent duty.

DATA SHARING

Information relating to our Prevent duty should be shared within the Collegiate University and with external sources taking due regard to the duty of confidentiality and the duty to protect vulnerable students and staff, the College may choose to share information about an individual or event with the central University or other colleges.

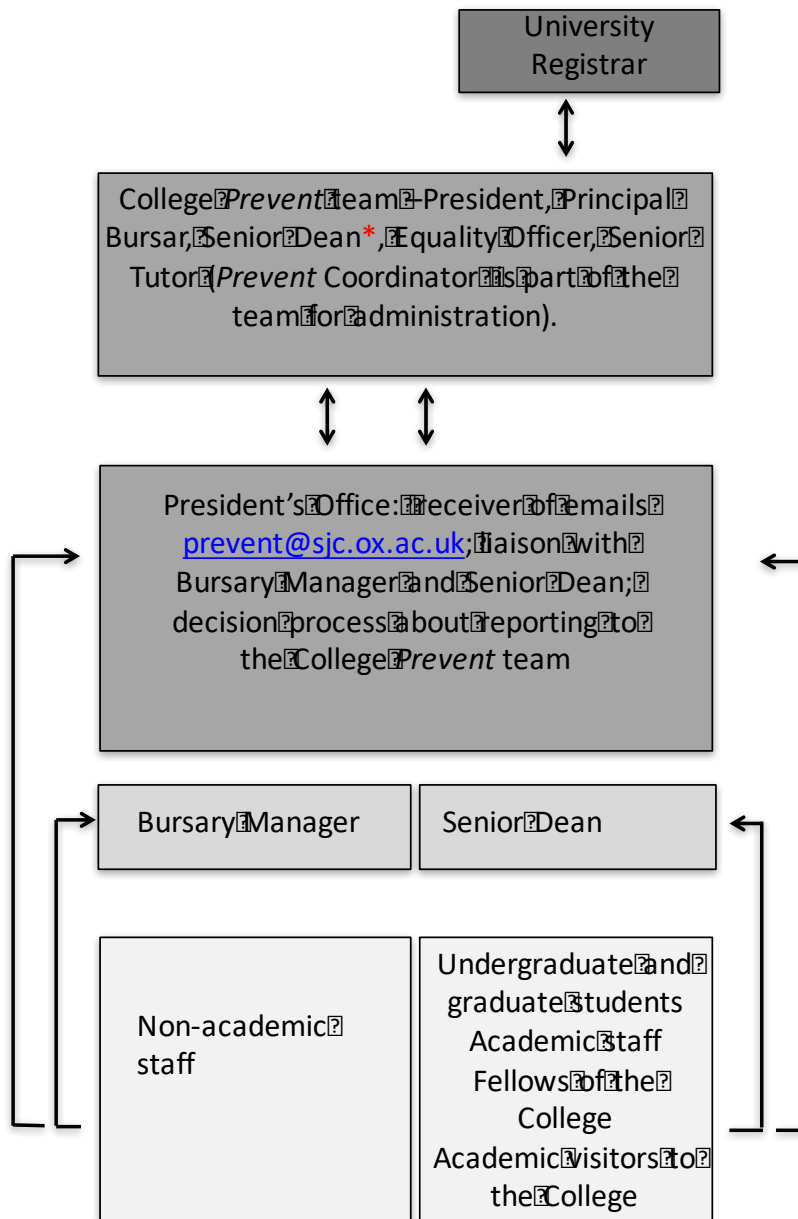
The College will at all times obey all legal duties to report criminal activity and terrorist criminal activity to the appropriate authority.

The Registrar will be the single point of referral by the Collegiate University to Channel to manage the risk of inappropriate referrals*.

Sections 36 to 41 of the CT&S Act 2015 sets out the duty on local authorities and partners of local panels to provide support for people vulnerable to being drawn into terrorism. In England and Wales this duty is the Channel programme. The government describes the 'Channel programme' as being 'about ensuring that vulnerable children and adults of any faith, 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.'

See <https://www.gov.uk/government/publications/channel-guidance>

ANNEXE 1 Reporting Flow Chart



*Senior Dean is the College Prevent Lead

ANNEXE 2

Training Document on the Prevent Duty

The *Counter-Terrorism and Security Act 2015* imposed a duty on College to have 'due regard to the need to prevent people from being drawn into terrorism' – the *Prevent* duty. The purpose of this briefing document is to provide information on how the College will comply with this legal duty.

How the *Prevent* Duty will affect members of St John's College

The College Governing Body will ensure that it is understood by the College community as a whole that principles of free expression, academic freedom, autonomy, confidentiality, privacy, and equality of rights according to the law, provide the overarching context within which the *Prevent* duty is to be considered. As such, the Governing Body's position is that the *Prevent* strategy should be implemented in a manner that is proportionate and positively secures and protects those rights. The operation of the College's *Prevent* Policy and the *Prevent* duty will be reviewed annually by Governing Body with continuing input from Fellows, academic and non-academic staff and the student body, to ensure that the normal operation of the College and freedoms therein are not affected.

In accordance with the advice from the Conference of Colleges and the Vice-Chancellor, the College has in place a number of publically available Policies and Procedures that will allow it to comply with the *Prevent* Duty (see University position on the *Prevent* duty - <https://www1.admin.ox.ac.uk/councilsec/prevent/>)

There will be a small number of minor effects within College, which can be viewed in detail in the Policies and Procedures section of the College website, and are summarized below for convenience. Advice can be sought at any time through the Senior Dean's Office or via email from prevent.coordinator@sjc.ox.ac.uk.

A. Booking of rooms for internal and external events.

1. **Only** criminal speech will be proscribed and therefore most risk assessments for typical events occurring in College will require minimal assessment.
2. Booking rooms where only speakers and guests internal to the University will be present:
 - a. Academic and non-academic staff will risk assess their own events using a risk assessment template.
 - b. For student room bookings requiring decanal permission, or permission from a Fellow – the Senior Dean's office or individual Fellows will risk assess the event using a risk assessment template.
 - c. For rooms requiring no decanal permission or permission from a Fellow - student members will risk assess their own events using a risk assessment template.
3. Booking rooms where speakers and guests external to the University will be present

- a. Academic and non-academic staff will risk assess their own events using a risk assessment template.
- b. Students will submit requests for approval to the Senior Dean's Office 7 days in advance.

B. Identifying individuals at risk of radicalization

The College is required by the new legislation to provide a procedure to identify individuals at risk of being drawn into terrorism. Action will **only** be proposed in respect of terrorist criminal activity, where the College already has certain legal duties. It is anticipated that most 'at risk' individuals, will already have been identified and supported through the College's existing robust welfare provision.

C. Internal reporting of individuals at risk of radicalization

The College is required by the new legislation to provide a procedure for internally reporting individuals deemed to be at risk of being drawn into terrorism. The different routes of reporting are shown below:

- (i) Non-academic staff – Bursary Manager
- (ii) Undergraduate and graduate students, academic staff, College Fellow and academic visitors – Senior Dean

To minimize the risk of inappropriate reporting, the College *Prevent* team will stringently assess any reports internally. Only when the help available through the robust College welfare system is insufficient, will the College *Prevent* team seek advice from the University *Prevent* team. The University *Prevent* team will itself carry out a further assessment to identify help within the University welfare system. The only source of external reporting will be from the University Registrar when all other reasonable means have been exhausted.

D. Further Training on the *Prevent* Duty

Further training on the *Prevent* duty in Universities is freely available through individual online modules from the Learning Foundation <http://www.safecampuscommunities.ac.uk/training>. Short briefings and advice can be sought from the College *Prevent* Coordinator as required, prevent.coordinator@sjc.ox.ac.uk.

Prevent training will ensure that practice remains subject to, and does not undermine, the rights of academics, students, staff and visiting speakers under existing law, including the Education (No 2) Act 1986, the Human Rights Act 1998, the Equality Act 2010 and data protection legislation.

E. IT Usage

The University IT Committee carried out a careful review of the effectiveness of filtering and is currently not recommending this on the grounds that it would not be effective and would cause a disproportionate burden. The College takes a similar view.



POLICY HISTORY

<i>Date of GB approval</i>	<i>Brief summary of changes</i>	<i>Confirmation that linked documents have updated if necessary</i>	<i>College policy register updated</i>
June 2016	Generation of policy	confirmed	Yes (Sandra Campbell)
March 2017	Email address and title of Equality Officer changed. Policy reviewed by Committee	confirmed	Yes (Sandra Campbell)
March 2018	Web links updated. Policy reviewed by Committee and subsequently approved by GB	confirmed	Yes (Sandra Campbell)
Jan 2019	Domestic Bursar replaced by Home Bursar on the Prevent team. Policy reviewed by Committee and subsequently approved by GB	confirmed	Yes (Sandra Campbell)
Apr 2019	Home Bursar and Lodge Manager removed from the Prevent team	confirmed	Yes (Sandra Campbell)
Feb 2020	Policy reviewed by Committee and subsequently approved by GB	confirmed	Yes (Kate Doornik)
Jan 2021	Policy reviewed by Committee and subsequently approved by GB	confirmed	Yes (Sandra Campbell)
Feb 2022	Individual Prevent documents brought into one central document.	confirmed	Yes (Neil Tindall)