

Learning Institute Prevent Policy

1. Policy

Westcountry Schools Trust (WeST) through its outreach arm, the Learning Institute, is required under the Counter-Terrorism and Security Act 2015 to 'have due regard to the need to prevent people from being drawn into terrorism'. Within this policy the phrase, the Learning Institute, is used for the operational organisation in order to indicate the scope of this Prevent Policy since WeST is developing Prevent policies for use in its schools which will differ in some aspects of detail from this, though not in principle or aim. As a partner to higher education institution, under section 29, The Learning Institute 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. Some of the ways in which we meet these responsibilities are set out in this document.

2. Scope of the Procedure

The Prevent Policy applies to all staff and (where relevant) students of the Learning Institute.

- All persons (whether academic staff or otherwise) whose normal place of work is on premises of the Learning Institute
- All registered students at the Learning Institute (whether full-time or part-time)
- All bodies or persons not associated with the Learning Institute who hire or otherwise use the Learning Institute's facilities

This Policy applies for the following meetings and events:

- Meetings and events within the Learning Institute which are arranged by staff or students but outside normal academic activity and which involve an external speaker not associated with the Learning Institute (i.e. persons associated with the Learning Institute using Learning Institute facilities but not for meetings or events directly connected with their academic activity in the same way as persons outside the Learning Institute immediately below, whether by hire or any other arrangement)
- Meetings and events within the Learning Institute or other uses of Learning Institute facilities which are arranged by persons not associated with the Learning Institute, whether by hire or any other arrangement

This Policy does not normally apply to activities directly linked with the academic work of the Learning Institute, committee meetings, official Trade Union activities and social or cultural events. However it may be invoked if the Learning Institute becomes aware that an event is likely to lead to a contravention of our Prevent Duty, which is to prevent people being drawn into terrorism.

3. Roles and Responsibilities

All members of staff should be aware of the Learning Institute's responsibilities under the Prevent Duty and of the measures set out to comply with it. Members of the Learning Institute community who are concerned about a student who might be at risk of being drawn into terrorism should report this to their line manager and the Director of the Learning Institute and/or to the HR Director and/or to the CEO in WeST. Training is provided to support staff in their responsibilities under this Policy. As course leaders also play an important role in having oversight of activities and events, the relevant course leader must also be notified if there is a concern regarding an event, speaker or student in their school.

4. Approach

4.1 The Learning Institute welcomes the Government's intention that the Prevent Duty is implemented 'in a proportionate and risk-based way' and that it should not create large new burdens on institutions. We therefore intend to implement our legal responsibilities as part of our existing policies and procedures, which we also consider to be the best way of ensuring a joined up approach.

4.2 The Learning Institute has a duty of care towards its students and is committed to providing an environment that promotes opportunities to learn and develop as individuals. We take seriously our responsibility to ensure the safety and wellbeing of students, staff and the wider community and, as part of this, wish to do all that we can to prevent any member of the Learning Institute community from being drawn into terrorism. We also have a responsibility to protect academic freedom and general freedom of expression.

5. Leadership

The Learning Institute takes seriously the need to prevent terrorism occurring in our community. Our approach has been approved by the Chief Officer and this policy has been approved by the Board of Trustees of WeST. The WeST HR Director has been identified as the member of senior management responsible for ensuring that the Learning Institute complies appropriately with the Prevent Duty, in liaison with the Prevent coordinators from partner universities and other key stakeholders within and beyond the Learning Institute. An annual report will be made to the Board of Trustees and to partner universities in order that the Board and partners can discharge their responsibilities under legislation and HEFCE reporting requirements.

6. Pastoral Care

The Learning Institute is responsible for the welfare of all of its students. Pastoral care is a key way of safeguarding student welfare, particularly those who may be vulnerable to being drawn into terrorism. Pastoral care is delivered through academic and pastoral tutors, and Student Services. Training will be provided for all staff involved directly in student welfare, so that such staff are aware of their duties under Prevent, and understand the processes by which they can support vulnerable students. Advice and guidance are available for students should they require it from Student Services and the student's personal academic tutor. All staff and students should be aware that, should they have concerns regarding the wellbeing of a student, they can raise these in confidence with the relevant staff contact as outlined here.

7. Risk Assessment and Action Plan

As required by the Prevent Duty and HEFCE reporting requirements, we have carried out an assessment of the risk of our students being drawn into terrorism. That is reflected in an annex to The Learning Institute's Annual Partnership Quality Report and given to the WeST Board of Trustees. Where any significant risk is identified we will consider what action might mitigate the impact/likelihood of that risk crystallising, and if necessary include it in the Learning Institute's Annual Improvement Plan as a specific Prevent Action Plan.

8. External Speakers

8.1 The Learning Institute is bound by and adheres to partner universities' policies and procedure on Freedom of Speech. These set out how we will ensure that we meet the different legal requirements on us, not least the duty under the Education (No. 2) Act 1986 to secure freedom of speech within the law. Under these policies, where the views expressed by any external speaker constitute views that risk drawing people into terrorism, or are shared by terrorist groups, permission must be sought by the staff or student organiser from the Director of the Learning Institute, who will consult as appropriate and will seek a decision from the WeST Trust Board and the relevant university partner as necessary. Due diligence is carried out where required and we will share information with other institutions if appropriate about any event that comes within the remit of Prevent.

8.2 In complying with the Prevent Duty the Learning Institute will not:

- Provide a platform for any proscribed terrorist organisation or permit the encouragement of terrorism in any way;
- Allow gender segregation at any event it organises or at events held on its premises

8.3 The Learning Institute underlines its commitment to protect academic freedom as set out in the policies of its university partners.

9. Sensitive Research

In certain circumstances, some staff members and students may require access to sensitive material as part of their scholarly work. In such circumstances, the Learning Institute ethics procedure and those of its partner universities will be followed in a way that does not impact on academic freedom. It is the responsibility of academic supervisors to ensure that students follow this procedure when relevant.

10. Staff Training

We will provide awareness training on a regular basis for all relevant staff, tailored to need.

11. Faith Facilities

The Learning Institute 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.

We consider it unacceptable for our IT networks to be used in any way that supports, promotes or facilitates terrorism. The Learning Institute will also keep IT procedures and the use of social media under review with reference to Prevent.

13. Communications

We will not permit material supporting terrorism to be displayed within the Learning Institute premises and will remove any such material if it is found. Likewise, we will seek to ensure that the Learning Institute's 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.

14. Information Sharing

The Learning Institute is aware of the Channel process and of the opportunities for informal and formal sharing of information with relevant authorities. We will use these when we consider 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.

15. Related Policies and Procedures

The following policies and procedures are related to the Prevent Policy:

- Freedom of Speech policies and procedures of the Learning Institute's university partners
- WeST IT Acceptable Use Policy
- WeST IT Security Policy
- WeST Organised Events: Event Management Policy and Guidance Notes (Health and Safety)
- The Learning Institute Equality and Diversity Policy Statement and Code of Practice and Racial Equality Policy

16. Review

The Learning Institute Governing Board is responsible for the annual review of this Policy.

Appendix

Prevent duty compliance: Preliminary self-assessment report

Name of provider: Westcountry Schools Trust (WeST) trading as The Learning Institute

UK Provider Reference Number: 10057045.

Authorised by: Richard Light, Director of Education

Signature

Date: 27th May 2022

Note: Paragraphs referred to are found in the statutory Prevent guidance: 'Revised Prevent Duty Guidance for England and Wales' (PDG) and 'Prevent Duty guidance for higher education institutions in England and Wales (HEG).

Factor in the 'Prevent' duty guidance	Self-assessment rating (A to E)	Comments
a. Arrangements for senior management and governance oversight of the implementation of the provider's 'Prevent' duty obligations and engagement with 'Prevent' partners.	B	Need for Trust Board approval of policy and reporting process
b. 'Prevent' risk assessment.	C	MGM agenda item March 2018
c. Action plan in response to that risk assessment	C	MGM agenda item March 2018
d. Arrangements for engaging with and consulting students on the provider's plans for implementing the 'Prevent' duty.	C	MGM agenda item March 2018
e. Training appropriate staff about 'Prevent').	A	On-going rolling training programme
f. Arrangements for sharing information internally and externally about vulnerable individuals, where appropriate.	A	Within course management and student support systems
g. Policies and procedures for approving external speakers and events on campus.	A	The Learning Institute follows the policy of the relevant university partner

Factor in the 'Prevent' duty guidance	Self-assessment rating (A to E)	Comments
h. Code of practice for ensuring freedom of speech within the law on the provider's premises, including (if applicable) those of the students' union (if not covered in the external speakers and events policies).	A	As above.
i. Arrangements to protect the importance of academic freedom (if not covered in the external speakers and events policies).	B	Seeking guidance from university partners
j. Policies and procedures for approving branded events taking place off campus (if not covered in the external speakers and events policies).	E	Not applicable
k. Arrangements for sharing information about external speakers with other providers, where legal and appropriate (if not covered in the external speakers and events policies).	B	Contacts being made for information sharing with internal colleagues, partners and key agencies
l. Arrangements for ensuring sufficient pastoral and chaplaincy support for all students (including arrangements for managing prayer and faith facilities).	A/B	Pastoral support is available through Learning Institute student support service. Chaplaincy is only available through university partners. Prayer and faith facilities are arranged to meet individual need.
m. Policies for the use of the provider's computer facilities (hardware, software, networks, social media), to include consideration of filtering arrangements and of academic activities that might require online access to sensitive or extremism-related material.	A	WeST Acceptable Use policy in place
n. Arrangements for engaging with students' unions and societies, which are not subject to the 'Prevent' duty but are expected to cooperate with their institution.	B	Process underway – review July 2018

Rating scale:

- A** Arrangements, including documented policies and procedures, are in place and have been reviewed and updated as necessary to reflect the statutory Prevent guidance. Where appropriate, they have been formally approved. They are active.
- B** Arrangements, including documented policies and procedures, are in place, but need to be reviewed against the statutory 'Prevent' duty guidance, updated as necessary and, where appropriate, formally approved.
- C** Arrangements, including documented policies and procedures, are in preparation.
- D** Arrangements, including documented policies and procedures, have not been prepared yet.
- E** This factor does not apply, so arrangements are not in place.

Providers that have assessed themselves to be B, C or D should indicate in the comments column a timescale by which they will reach level A. Providers that consider a factor does not apply should explain why in the comments column.