

Prevent Policy and Procedure

1. Introduction

- 1.1. Following the introduction of legislation in 2015 (The Counter Terrorism and Security Act), SPTI, in common with other Higher Education providers, is required to comply with a duty to prevent people from being drawn into terrorism and to ensure vulnerable individuals receive timely and appropriate support.
- 1.2. The Prevent Duty has three main objectives:
 - 1.2.1. Respond to the ideological challenge of terrorism and the threat faced from those who promote it
 - 1.2.2. Prevent people from being drawn into terrorism and give them advice and support
 - 1.2.3. Work with sectors and institutions where there are risks of radicalisation
- 1.3. The statutory guidance for higher education institutions highlights key areas of attention. These are:
 - 1.3.1. External speakers
 - 1.3.2. Partnerships with other local organisations engaged with Prevent
 - 1.3.3. Risk assessment and action plan
 - 1.3.4. Training of those who are employed or engaged with the delivery of training
 - 1.3.5. Welfare and pastoral care / chaplaincy support
 - 1.3.6. IT policies
- 1.4. The Office for Students is the monitoring body for Prevent for HE providers and we are required to submit annual reports to the OfS and University of Staffordshire relating to this. In addition, SPTI is required to report to OFS any 'serious' issues relating to our Prevent duty responsibilities as they arise. A serious issue could include any incident which triggers revisions to our Prevent policy or which constitutes a serious operational risk.
- 1.5. In accordance with our statutory duty, SPTI has a risk assessment and action plan in place. It is important that the actions taken by SPTI are both proportionate to the level of risk identified and in keeping with the culture, mission and aims of SPTI.
- 1.6. SPTI has adopted a risk-based approach to put in place appropriate measures to fulfil its duty under the Counter-Terrorism and Security Act 2015. However, at the same time, it must also be noted that it is required to fulfil other legal duties, such as ensuring freedom of speech and promoting equality and diversity throughout the SPTI.
- 1.7. SPTI recognises that terrorism can be associated with a wide range of ideologies. Its commitment to safeguarding all individuals within its community from being drawn into terrorism will be balanced with its commitment to promote diversity and equality and to foster anti-discriminatory practice.
- 1.8. SPTI seeks to provide a safe, supportive and inclusive environment for learning, teaching, research and scholarship within the area of counselling and psychotherapy training. SPTI has a robust admissions policy for entry into psychotherapy training which recognises the responsibility in relation to vulnerable adults which its trainees will bear once qualified. The Senior Leadership Team, Programme Leaders, and Facilitators involved in recruitment and admissions therefore take seriously their responsibility to assess prospective trainees at the point of application in relation to their personal suitability and readiness to engage in training for this vocation – a suitability which is reviewed at key points throughout training. Included in this assessment is the prospective student's psychological maturity and stability, their capacity for reflexivity and self-awareness, and their ability to deal with diversity and complexity in relationships with others. All applicants are asked to declare

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any criminal convictions at the point of application and to undergo an enhanced (adult) DBS check at the start of training. Given this rigorous process at application, we consider that the risk of SPTI trainees being drawn into terrorism is small from the outset, though we recognise that this risk cannot be entirely eliminated.

1.9. This policy and associated procedures applies to all SPTI staff, those involved in the delivery of courses and students. They seek to help everyone to understand the SPTI's responsibilities in relation to its Prevent Duty, to guide those who have grounds to believe that a student, member of staff or course delivery team is at risk of being drawn into terrorism, and to outline the appropriate process if concerns exist.

1.10. This policy should be read in conjunction with SPTI's Data Protection Policy, CPD Booking Policy (in relation to External Speakers and Events), Moodle Site Policy (in relation to SPTI intranet use) and the 'How to respond to a Prevent concern' flowchart.

2. Definitions

2.1. The statutory definition of 'terrorism' should be applied where that term is used in this policy and associated procedures. The Terrorism Act 2000, defines terrorism as "the use or threat of action which involves serious damage to property; or endangers a person's life; or creates a serious risk to the health and safety of the public or a section of the public; or is designed seriously to interfere with or disrupt an electronic system. The use of threat must be designed to influence the government or to intimidate the public and is made for the purpose of advancing a political, religious, racial or ideological cause."

2.2. The Prevent Strategy, published by the government in 2011, defined extremism 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.... (and) calls for the death of a member of our armed forces." Where the term extremism is used within this policy and procedures, it should be recognised in the context of this definition.

3. Senior Leadership Team and Governance Oversight, Engagement with Students and Engagement with Prevent Partners

3.1. The Directors of SPTI have accepted responsibility for compliance with the SPTI's Prevent Duty and have appointed Will Graham to:

- oversee the implementation and development of SPTI's Prevent policy and associated procedures;
- ensure appropriate staff are provided with relevant training;
- ensure relevant updates on the Prevent agenda are communicated to staff;
- receive updates on any internal or external issues of concern;
- monitor and ensure implementation of SPTI's risk assessment and action plan;
- maintain contact with the Regional Prevent Co-ordinator.

3.2. In Will Graham's absence, the Senior Leadership Team have operational responsibility for Prevent matters.

3.3. The Directors will receive an annual report on the implementation of SPTI's Prevent Duty during the previous year, including data about any referrals to the Channel programme, any issues arising in relation to CPD events, and an update on staff training.

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3.4. The engagement of students in terms of SPTI's Prevent Duty is through the Combined Programme Committee. Students have been informed of SPTI's duty during induction and will be kept up to date in relation to Prevent related matters in this way. Students are also free to raise general Prevent related concerns through this forum. Specific concerns will be raised via the Prevent Procedure.

4. Concerns about a student or member of staff or course delivery team

4.1 A student, member of SPTI staff, member of the course delivery team or external professional with whom students are in contact (therapists, supervisors, placement line managers) may identify concerns about a student, member of staff or member of the course delivery team potentially being drawn into violent extremism or terrorism based on information received or observed behaviour.

4.2 Indicators of concern might include:

- threats of violence associated with extremism;
- use of extremist language;
- expressions of extremist views and sharing of extremist materials, including on social media;
- possessing, accessing or requesting extremist materials, unless authorised to do so for academic study;
- direct or indirect disclosure from the individual, friends or family about vulnerability to being radicalised, drawn into terrorism or violent extremism;
- enabling individuals who are not members of the SPTI community to access SPTI buildings, where those individuals are a known cause for concern in the context of this policy.

4.3 Where concerns are identified as relating to the Prevent Duty, they will be referred to the Prevent Lead, unless there is a threat to life or serious and immediate danger, in which case the police will be contacted.

4.4 Where concerns are not Prevent related, they will be dealt with under other processes (pastoral care, student disciplinary or student fitness to practise).

4.5 Where concerns are identified, these will be shared in a safe, supportive and confidential fashion in order to enable them to be investigated appropriately and any intervention to be determined and implemented. SPTI's approach to any concerns raised about a student, member of staff or a member of the course delivery team is to safeguard the individual about whom concerns have been expressed.

4.6 Where a concern has been received through this process, the matter will initially be considered by Will Graham. If initial consideration establishes grounds for the matter to be reviewed further, then the purpose of the review will be to gather key information and evidence in order to allow full consideration of the circumstances of the case. Depending upon the circumstances, this may involve meeting with the individual about whom the concern has been raised.

4.7 The possible outcomes associated with the initial review are:

- i) No further action is required. In this case, a confidential record of the nature of the concern and its outcome will be held by Will Graham.

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- ii) Internal action is required. This would be the case where there are some grounds for concern. In this situation, the Prevent Lead will determine, with relevant SLT members, any interventions which need to be put in place, such as a disciplinary or fitness to practise procedure. The actions and a date for further review will be communicated orally and in writing to the individual. At the point of further review, the Prevent Lead and relevant individuals may follow any of the routes described in paragraphs 4.7i) to iii) as appropriate.
- iii) An external referral is required. Where an external referral is indicated, the Prevent Lead must discuss the matter with the Director team before such a referral is made. Depending on the nature of the concern, there are likely to be two possible outcomes:
 - a) Referral to the police if there is evidence to indicate that a criminal act may be committed or has already been committed, or
 - b) Referral to the Regional Prevent Co-ordinator or to the Channel Programme (a multi-agency panel established as part of the Prevent policy to identify and support individuals who are at risk of being drawn into terrorism).

5. Process for raising concerns in connection with the Prevent Duty

- 5.1. As with any other concern about the well-being of an individual, or their current fitness to practise, concerns relating to SPTI's duty to prevent a student, member of staff or member of the course delivery team being drawn into terrorism, should be discussed in the first instance with the individual in question by the most suitable member of the SLT (Programme Leader for a student, Programme Leader and relevant Line Manager from the SLT). If concerns are received from a third party, all efforts should be made to establish the veracity of the report. Unsubstantiated claims will not be pursued.
- 5.2. Where concerns have been raised about an individual being vulnerable to being drawn into terrorism, the investigating member of SLT should discuss concerns with Will Graham, SPTI's Prevent Lead, who may at any point in the process which follows also seek advice and guidance from our Prevent Regional Coordinator or Prevent Adviser.
- 5.3. If, on investigation, the concerns prove unfounded, a confidential record is made of the concerns raised and their resolution, and the matter is closed. The record will be kept separately from other records.
- 5.4. If, on investigation, there are some grounds for concern, either related to the Prevent Duty, or concerned more widely with the well-being or fitness to practise, relevant internal procedures (pastoral care, fitness to practise, disciplinary) will be followed. The Senior Leadership Team will be responsible for pursuing these procedures in relation to their responsible team member, but should consult with the Prevent Lead on all matters pertaining to Prevent concerns. Records will be kept of the process and a separate record held by Will Graham of any concerns specifically related to the Prevent Duty, including the outcome of the process.
- 5.5. If on investigation, there remain concerns about an individuals vulnerability to being radicalised or drawn into terrorism, an external referral may be indicated. In all instances, Will Graham, as the Prevent Lead, will be responsible for making such a referral, following consultation with the Director Team.