

Consalia Limited

Prevent Policy

Version number	Date of issue	Reason for update
V1.0	25 th September 2018	
V1.1	18 th February 2019	After internal review

1. Statement of Intent

Consalia acknowledges and accepts its legal duty to have due regard to the risk of people being drawn into terrorism. It also believes that individuals being drawn into terrorism is a form of harm and accepts the obligations arising from the Prevent legislation as an important element of its general duty to protect and Safeguard its staff and students from all forms of harm. Consalia must balance the requirements of Prevent with its core belief that the cultural religious and ethnic diversity of its staff and students should be celebrated. It must also meet its legal and moral obligation to allow and promote academic freedom and free speech which are vital elements of a successful community of students, scholars and the staff who support them.

2. Promoting 'Prevent'

Consalia will promote its Prevent policy in several ways:

- All programme handbooks include contact information for assigned Safeguarding and Prevent officers, as well as additional support available.
- All policies can be accessed via Consalia's website on the Policy page.
- Each module communication will contain the above link to our Policy page.
- As a contractual process, the Commitment Statement must be understood, signed and regularly reviewed by an apprentice and their employer. Web links to Consalia Policies are contained within this document.
- Tutors are encouraged to provide reminders of available support, welfare and safeguarding outlets, especially at the start of a programme and the beginning of each year.
- Prevent will be discussed at the regular review meetings with employers.
- Consalia cohort tutors and training staff are made aware of Consalia's Prevent during their on-boarding and the policies are reviewed with all staff on an annual basis.

3. Our Policy

This policy provides the management direction to ensure that the requirements of the Counter Terrorism and Security Act 2015 (hereafter referred to as "Prevent"), specifically the duty of Consalia to have due regard to the need to prevent people from being drawn into terrorism, is incorporated into all its relevant policies, procedures, systems, working practices and partnership arrangements. The policy's key purpose is to assign the high-level responsibilities for ensuring Consalia compliance with Prevent.

As the requirements of Prevent risk a conflict with Consalia's core obligations to facilitate and promote free speech as well as to protect individual privacy and academic freedom, the policy is presented as a series of "Prevent Principles" which aim to articulate how such conflicts should be dealt with and the scope for Prevent related changes to all other operational policies and procedures. The policy is

therefore a combination of Prevent requirements coupled with core Consalia standards. The policy will also assign the high-level responsibilities to senior Consalia officers for ensuring that the requirements of Prevent are met, in ways which are consistent with this policy's principles, in the policies and documented procedures arising in their areas of responsibility.

If comments are made by apprentices and students – during any contact with Consalia – that could be regarded as extremist, our staff will encourage the apprentices and students:

- To consider alternative views and interpretations
- To think critically
- To consider what evidence they have and whether it is full and accurate
- To explore how impartial the information they have received is - have they considered alternative views and interpretations fully?
- To consider the British values of: Democracy; the rule of law; individual liberty and mutual respect; and tolerance of those with different beliefs and faiths.
- Staff will use opportunities to challenge extremist views through discussion with apprentices and students
- If our staff do not feel confident in challenging extremist ideas with their apprentices and students they should document their interactions with the student / apprentice and ask for support from the designated Safeguarding Officer, who will have completed training in this area.

4. Policy Scope

This policy will apply to all in Consalia community: staff, students, contractors and visitors. The activities of Consalia staff and students taking place away from Consalia or subcontractor sites will also fall within the policy's scope if they are undertaking activities that are, or perceived to be, associated with Consalia.

5. Equality Analysis

This policy recognises the importance of providing for and celebrating the cultural, religious and ethnic diversity of its staff and students. It complies with the public sector equality duty and requires all staff, students and visitors to respect Consalia's values, be sensitive to the diversity of Consalia community and to show respect to all sections of that community. Monitoring should take place over time to ensure Consalia is aware of any trends or patterns emerging involving particular groups of people and impact of this policy on those groups.

6. Definitions

- **Prevent** – The anti-radicalisation agenda embedded in the Counter Terrorism Act and called Prevent in this policy.
- **Vulnerable individual** – An individual shown to be, on some significant level, a risk to themselves or others, if assistance is not provided.
- **Academic freedom** – The expectation that staff and students shall, have freedom within the law to question and test received wisdom and to put forward new ideas and controversial or unpopular opinions, without placing themselves in jeopardy of losing their jobs or privileges.
- **Radicalisation** – Process by which an individual comes to adopt extreme political, social or religious views, giving rise to a concern that they will act illegally

7. Legislative context

The Prevent requirements are included in section 26 of the Counter-Terrorism and Security Act 2015. Education Act 1994 includes obligations relating to free speech. The Data Protection Act and Human Rights Act include relevant obligations relating to individual privacy and the security and fair processing of personal information.

8. Policy Principles

Consalia accepts its legal responsibility to have due regard to the need to prevent people from being drawn into terrorism. In accepting this responsibility, it must also balance detailed Prevent requirements against its core mission to ensure that certain fundamental standards, vital to a thriving academic community, are preserved. This balance and commitment to Prevent, is achieved by ensuring that any changes to operational policies, guidelines, processes, systems or working practices implemented to ensure Prevent compliance, align with the one or more of the following core Prevent principles:

- **Safeguarding** – Preventing vulnerable individuals from being drawn into terrorism is a safeguarding issue and Consalia policies and procedures are in place to help safeguard staff and students.
- **Staff awareness** – Staff should be made aware of the general requirements of Prevent but in ways that ensure they remain sensitive to the cultural, religious and ethnic diversity of Consalia community.

Our Safeguarding Officer has undertaken two relevant training courses: 'Side by Side-What can you Trust?' and 'Radicalisation & Extremism. This has been disseminated and the relevant information shared with all our tutors and course director, who have confirmed that they have received instruction concerning Prevent obligations.

Consalia is also in contact with its London Further and Higher Education Prevent Coordinator – employed by the Department For Education (DfE) – to further enhance our knowledge of Prevent resources available for Work Based Learning Providers such as ourselves.

- **Celebrating diversity** – The culturally diverse nature of Consalia must be actively celebrated and promoted to counter the threat of radicalisation from external influences
- **Multi-faith** – The provision of adequate facilities to allow groups to observe their faith, coupled with effective chaplaincy arrangements, are essential to harmonious community relations and inter-faith dialogue so are an important element of Consalia’s Prevent approach
- **Information sharing** – Information pertinent to Prevent risks should be presented in writing to and subsequently investigated by the designated Prevent officer. Some internal and external information sharing may be necessary under appropriately controlled conditions. This does not amount to an agreement to share personal data on anything other than a needs-based and case by case basis.
- **Academic freedom** – The ability of students and staff to research, teach and debate any topic will not normally be fettered unless, on a case by case basis, a specific threat is identified or a clear Prevent requirement exist.
- **Free speech** – Policies and procedures relating to the management of events, speakers and the display of posters and other promotional material must balance the obligation to enable free speech with the requirements of Prevent

9. Website Content & Social Media

Consalia will ensure IT usage, safeguarding and prevent is covered as part of regular reviews with the employer.

- **Website Filtering** – We will work with employers to ensure filtering of harmful websites is in place within the workplace.
- **Social Media** – Whilst ostensibly just another medium for communication, social interaction and debate, Consalia recognise that Social Media is a vehicle by which vulnerable individuals are particularly susceptible to radicalisation. Whereby any member of Consalia is made aware of activity that could be regarded as extremist, this shall be escalated immediately to the designated Safeguarding officer.

10. Partnerships

Consalia will work in partnership with other HEIs to further understand, assess and respond to the risk of people being drawn into terrorism.

11. Governance Requirements

Responsibilities over governance rests with the Consalia Safeguarding Officer.

12. Queries

For any queries relating to Safeguarding and Prevent issues, please contact the Safeguarding Officer (lsutton@consalia.com).

Prevent Referral Agency Confidential Anti-Terrorism hotline: **0800 789 321**