

Information to providers on Prevent obligations

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What is Prevent?

- A government strategy to stop people becoming involved in violent extremism and/or in supporting terrorism.
- Affects everyone, not only under 18s; all students, staff and sub-contractors (homestays)
- Coordinated by the Home Office, it includes
 - * Working with local community groups to support anti-radical/terrorist attitudes
 - * Working with educational establishments, including ELT, to reduce risk of radicalisation
 - * Identifying and safeguarding the vulnerable, who are more likely to be drawn into extremism
 - * Identifying and challenging those holding extremist views
 - * Police forces/local authorities now have Prevent staff/co-ordinators
 - * WRAP training (Workshop Raising Awareness of Prevent), free from the police/local authority
 - * Channel is a multi-agency support process to try and safeguard vulnerable people, once identified, from being drawn further into extremism and criminality
- Home Office have identified ELT providers as potential 'soft targets' for those promoting radical views
- Prevent applies to any extremism, e.g. Muslim terrorism, racism, homophobia, right-wing ideology

Legal obligation

- The Counter-Terrorism and Security Act 2015 places a statutory duty on specified authorities (including colleges, schools, universities and others) to 'have due regard to the need to prevent people from being drawn into terrorism'.
- Accredited and non-accredited ELT providers are included in the statutory duty; they have been categorised as 'Independent Learning Providers', needing to meet the standards expected of Further Education (FE) colleges.
- Updated government guidance documents for Further Education came into effect on 18 September 2015.
- For England and Wales:
www.gov.uk/government/uploads/system/uploads/attachment_data/file/445977/3799_Revised_Prevent_Duty_Guidance_England_Wales_V2-Interactive.pdf
- For Scotland
www.gov.uk/government/uploads/system/uploads/attachment_data/file/445978/3799_Revised_Prevent_Duty_Guidance_Scotland_V2.pdf
- Legislation does not affect Northern Ireland
- Statutory guidance states that the Prevent duty "is to be implemented in a proportionate and risk based way".

Compliance

- Accreditation UK in the new 2016-17 Handbook includes Prevent as part of Section 2.1 Legal and regulatory compliance.
- It is covered in two inspection criteria
 - M1 Providers will operate at all times in accordance with the declaration made in the *'Declaration of legal and regulatory compliance form.....'*
 - W4 There will be policies and procedures, known to all students and staff for dealing with abusive behaviour by staff or students (verbal abuse, harassment, bullying, actual or threatened violence, damage to personal property) or behaviour that may lead to extremist radicalisation.

Additional inspection for all accredited and non accredited ELT providers

- Regardless of whether providers are inspected by Accreditation UK, OFSTED or ISI on their Prevent provision, they are, in addition, liable to inspection by BIS, the government Department for Business, Innovation and Skills www.gov.uk/government/organisations/department-for-business-innovation-skills
- BIS are responsible for inspecting Further Education provision, including 'Independent Learning Providers.'
- Inspections begin on 01 December 2015
- At least 50 Independent Learning Providers will be inspected per year

What ELT providers need to do to meet their Prevent duty

- Have leadership from the top, so owners/principal/CEO need training and to be aware of Prevent duty
- Identify a single point of contact within provider, a Prevent lead (often Designated Safeguarding staff)
- Engage with local authority/local police Prevent staff; a go-to person outside the provider
- Prepare a risk assessment/action plan document (see template)
- Training (see following sub-section)
- Have good welfare support and awareness that anyone may be vulnerable to extremist exploitation
- Have a Prevent policy (see sample) as well as including Prevent in safeguarding policy
- Ensure policy is happening
- Promote core British values, as stand-alone and ideally as part of curriculum
- Have staff exemplify core British values, and challenge when inappropriate views are expressed
- Develop students' critical thinking skills to help them question extreme views (for long-stay students)
- Have clear process of referral of concerns both within and outside the organisation
- Ensure the campus environment is one where everyone feels safe and supported (protecting vulnerable students)
- Keep records of all training and any Prevent referrals made outside the organisation

Training

- Free online training from the Education and Training Foundation (an organisation that provides support for FE colleges) <http://www.preventforfeandtraining.org.uk/prevent-online-training-modules>
- 4 different online courses, each with a certificate as evidence of training done: (i) governors & board members (ii) support staff (iii) practitioners (iv) leaders and managers. Terminology is for FE sector.
- Practitioners (iii) and leaders and managers (iv) most relevant to ELT providers
- Any online staff training must be supported by organisation-specific face-to-face training
- Provider's Prevent lead to complete face-to-face training to gain full understanding and knowledge and thus be able to properly train staff within organisation. EUK currently developing this training.

- Staff and homestay training to include:
 - (a) knowing what Prevent is and understanding context
 - (b) knowing how the organisation is meeting its Prevent duty, particularly any changes
 - (c) how to recognise vulnerable students
 - (d) knowing what to do if concerned; reassuring them of confidentiality/support if they report
 - (e) promote core UK values to challenge extremist views (see below), including modelling those values themselves
- Students and group leaders need to know
 - (i) terminology and the core British values (see below)
 - (ii) importance of maintaining a supportive and tolerant society within the school
 - (iii) any changes in school rules, particularly relating to IT and not accessing extremist websites
 - (iv) that they must report any concerns they have (about anyone) and who to report to.

Core British values:

- (i) democracy
- (ii) the rule of law
- (iii) individual liberty
- (iv) respectful tolerance of different faiths or beliefs.

BIS inspection process

- To gain background information, BIS inspectors will review providers' websites, and reports on providers from other inspecting bodies' websites, e.g. British Council or ISI
- The (single) inspector contacts ELT provider and asks them for Prevent risk assessment/action plan
- Providers are expected to cooperate with inspectors; failing to produce documents requested will be noted and could lead to a negative report
- BIS inspector will inform provider of the inspection visit date; they will expect to meet:
 - CEO/Principal or person in equivalent position
 - Designated Staff member with Prevent responsibility
 - Welfare officer
 - DoS
- During visit, BIS inspectors will select the practitioners (teachers), support staff (welfare and admin staff), students and possibly also homestays (sub-contractors) they wish to talk to
- They will look at documents, observe whether policies and procedures are being followed, whether training has been done and been effective, whether an outside Prevent contact has been made
- Evidence of promoting / finding the opportunity to promote core British values will be reflected through discussions, teaching materials, student work, notices around school
- Inspector's report will decide for each of the Prevent elements, whether the provider is
 - fully compliant
 - partially compliant
 - not at all compliant
- If a provider is partially compliant, they will have an opportunity to become fully compliant (details of time limit and feedback given to help them achieve that are not known). All providers must be fully compliant by 31 March 2016 (this date to be confirmed)
- If a provider is not at all compliant, a judgment will be made about whether the provider 'has the capacity for compliance'. If not the ultimate sanction is enforced closure.

A positive and cooperative response to the BIS inspection process is very important, even if a provider is not yet compliant.

Although Prevent provision must be proportionate, there must be a risk assessment/action plan to show why the provider is dealing with it as they are.

Some challenges identified for ELT providers

- What are the extremist websites that have to be blocked? How do we know? As they change (as they surely will) how are we kept up to date with that information? (No answer yet to this)
- Sometimes local police force does not have a Prevent officer. Contact local authority or neighbouring police force for guidance
- Teacher training providers need to consider (a) how they make trainees aware of their Prevent obligations and (b) how to handle themselves professionally in a classroom, i.e. not promoting any personal views
- How are prayer rooms being managed?
- Providers need an EAP (Emergency Action Plan); how to react in the event of any serious incident, as happened during the 7/7 bombings when some providers were affected
- If working through an accommodation agency, how do providers ensure that Prevent requirements are being met and that the homestays are suitable? As a minimum, need to update contracts with agencies to include Prevent Duty requirements.

30 November 2015