

**PREVENT POLICY 2022-23  
(Incorporating Freedom of Expression Policy)**

*This document which applies to the whole college inclusive of boarding is publicly available on the college website and upon request a copy (which can be made available in large print or other accessible format if required) may be obtained from the college office.*

**Scope:** All who work, volunteer or supply services to our college have an equal responsibility to understand and implement this policy and its procedures both within and outside of normal college hours, including activities away from college. All new employees and volunteers are required to state that they have read, understood and will abide by this policy and its procedural documents and confirm this by signing the Policies Register.

**Legal Status:** Complies with The Education (Independent School Standards) (England) Regulations currently in force.

**Monitoring and Review:** These arrangements are subject to continuous monitoring, refinement, and audit by the Co-Principal, who will undertake a full annual review, inclusive of its implementation and the efficiency with which the related duties have been implemented. This review will be formally documented in writing. Any deficiencies or weaknesses recognised in arrangements or procedures will be remedied immediately and without delay. All staff will be informed of the updated/reviewed arrangements and it will be made available to them in writing or electronically.

Reviewed: March 2022  
Next Review: March 2023

Signed

David Game  
Co-Principal and Founder

John Dalton  
Co-Principal

**Document Details**

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The Local Authority Prevent Lead for support and advice for the prevention of radicalisation is our Co-Principal and the Designated Safeguarding Lead who both take advice from the City of London Authority. The non-emergency police telephone number is: 111 and the Department for Education (DfE) dedicated telephone helpline and mailbox for non-emergency advice for staff and the Board of Directors: 020 7340 7264 and [counter-extremism@education.gsi.gov.uk](mailto:counter-extremism@education.gsi.gov.uk).

Our Prevent Coordinator: PC Claire Doyle (City of London) can be telephoned on:

0207 6012442 m 07523944209 or emailed [prevent@cityoflondon.gov.uk](mailto:prevent@cityoflondon.gov.uk) email: [clair.doyle@cityoflondon.pnn.police.uk](mailto:clair.doyle@cityoflondon.pnn.police.uk)

Ali Burlington – email: [ali.burlington@cityoflondon.gov.uk](mailto:ali.burlington@cityoflondon.gov.uk)

The College Prevent Officer is John Dalton; in his absence the DSLs

**This policy applies to the whole College including boarding.**

**Introduction:** Our College's Prevent strategy aims to stop people becoming terrorists or supporting terrorism and promotes the importance of this to staff and ensures that they implement the *Prevent* duty effectively. The Prevent duty is not intended to stop students debating controversial issues. Our College's Preventing Extremism and Radicalisation Safeguarding Policy also draws upon the guidance contained in the DfE Guidance 'Keeping Children Safe in Education, 2021' and the DfE's 'Teaching Approaches that help Build resistance to Extremism among Young People' builds resilience to radicalisation by promoting fundamental British values through the curriculum and through social, moral, spiritual and cultural development, equips students with knowledge, skills and understanding to prepare them to play a full and active part in society and ensures that the College is a safe place to discuss sensitive issues, while securing balanced presentation of views and avoiding political indoctrination.

**It is important that we recognise that during the lockdown period, it is possible that students could have become more at risk of radicalisation and the assimilation of extremists views owing to the sheer time spend on the internet. Therefore, the College has factored in the risk that COVID-19 and the lockdown may pose on students returning to full-time education.**

The threat to terrorism to the UK is real and serious. There are a few people who seek to attack the United Kingdom without warning. The aim of the Government's counter terrorism strategy, **CONTEST**, is to reduce the risk to the UK so that people can go about their lives freely and with confidence. We all have a role to play in supporting the aim of **CONTEST**. We can do this by remaining vigilant and reporting any suspicious activity. Suspicious activity can include someone:

- behaving differently for no obvious reason;
- with passports or other documents in different names for no obvious reasons;
- who travels for long periods of time but is vague about where they're going;
- buying or storing large amounts of chemicals for no obvious reasons;
- who visits or sends out links to extremist internet sites;
- who is recording and documenting information in a crowded location and
- who undertakes activity at a property that doesn't fit normal day-to-day life.

Police see the current threats as:

- ISIS, Al Qaeda and various radical Islamic terrorist groups
- Domestic Extremism in particular the far-right
- Animal Rights and eco-terrorism
- Lone actors or lone-wolf attackers

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**Purpose:** We ensure that:

- Our College complies with all the relevant current legislation and other National Standards which govern this area of our work.
- Our students keep themselves and others in the wider community safe.
- We prevent vulnerable young people in our care from being exposed to radicalisation and extreme views
- We provide opportunities for students to widen and develop interpersonal skills by meeting and forming relationships with people from outside the establishment.

The welfare and safety of individuals in our care is a major consideration at all times.

- Arrangements are in place to deal with concerns which may be raised about an individual/s in our care.

The Government's Prevent Strategy defines 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. We also include in our definition of extremism calls for the death of members of our armed forces". Extremists of all persuasions aim to develop destructive relationships between different communities by promoting division, fear and mistrust of others. Education is a powerful weapon against this; equipping students with the knowledge, skills and critical thinking, to challenge and debate in an informed way. Therefore, at David Game College our Personal, Social, Health, Economic Education (PSHEE) programme along with meeting the requirements set out in section 78 of the Education Act 2002 and promote the spiritual, moral, social and cultural (SMSC) development of our students.

Through ensuring students' SMSC development, Colleges can also demonstrate they are actively promoting fundamental British values. Actively promoting the values means challenging opinions or behaviours in College that are contrary to fundamental British values. Attempts to promote systems that undermine fundamental British values would be completely at odds with Colleges' duty to provide SMSC. The Teachers' Standards expect teachers to uphold public trust in the profession and maintain high standards of ethics and behaviour, within and outside College. This includes not undermining fundamental British values. It is our aim that the students gain an enriched understanding and tolerance of difference and diversity to ensure that they thrive, feel valued and not marginalized. Any prejudice, discrimination or extremist views, including derogatory language, displayed by students or staff will always be challenged and where appropriate dealt with in line with our Disciplinary Policy for students and the Code of Behaviour for staff. As part of wider safeguarding responsibilities, staff are alert to:

- disclosures by students of their exposure to the extremist actions, views or materials of others outside of College, such as in their homes or community groups, especially where students have not actively sought these out;
- graffiti symbols, writing or art work promoting extremist messages or images;
- students accessing extremist material online, including through social networking sites and excessive usage of online content; parental reports of changes in behaviour, friendship or actions and requests for assistance;
- partner Colleges, local authority services, and police reports of issues affecting students in other Colleges or settings;
- students voicing opinions drawn from extremist ideologies and narratives;
- use of extremist or hate terms to exclude others or incite violence;
- intolerance of difference, whether secular or religious or, in line with our equalities policy, views based on, but not exclusive to, gender, disability, homophobia, race, colour or culture;
- attempts to impose extremist views or practices on others and Anti-Western or Anti-British views.

In the event of concerns about a person becoming radicalised advice will be sought from the City of London Prevent Team who has a panel which meets to address issues of individuals who have been identified as being at risk of radicalisation but have not committed any terrorism offence. This Panel meets when a referral has been made and referrals can be made by anyone. During any subsequent external investigation, for the individual to remain in our care, the senior management team will hold a focus meeting to identify risks and control measures that can be put in place to reduce that risk. They will decide if it is safe to keep the individual or whether they need to undertake a period of temporary exclusion.

**Prevent Duty:** The National Prevent Duty Guidance (revised and updated, April 2021) website is:  
<https://www.gov.uk/government/publications/prevent-duty-guidance>.

<https://www.gov.uk/government/publications/prevent-duty-guidance/revised-prevent-duty-guidance-for-england>

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Our curriculum promotes the spiritual, moral, cultural, mental and physical development of students and prepares them for the opportunities, responsibilities and experiences of life. It also promotes community cohesion. Educational establishments have a clear responsibility to exercise their duty of care and to protect the welfare of students. It is understood that every College is unique. This means that any engagement or activity conducted under Prevent must be considered in light of local circumstances. Prevent support can be adapted to ensure activity is both appropriate and proportionate. As the strategy identifies, Prevent can work within both violent and non-violent extremism arenas and can include topics such as hate crime, racism, bullying, on line safety and extreme political views. This means that the strategy can be delivered in a variety of ways depending on the institution, its requirements and the potential risk.

Our College promotes young people in making positive choices about their lives and endorses the Channel early intervention scheme for students who could be at risk of radicalisation.

Channel is a national programme to safeguard children and adults from being drawn into terrorism. It became statutory in February 2015. It is an early intervention to protect and divert people away from the risk they face before illegal activity occurs.

**Radicalisation:** is defined in the government's *Prevent* strategy as *"the process by which a person comes to support terrorism and forms of extremism leading to terrorism"*. Radicalisation is a process which somebody goes through in order to become involved in extremist activities or terrorism, from a starting point of having no particular strong opinions or being a moderate person through to holding some extremist views, and it can be a process that happens online or in meeting people, and their conversations and their opinions are gradually changed over time." [Police, Non-priority Area] .There is no single way of identifying an individual who is likely to be susceptible to an extremist ideology as it occurs as a result of varying consequences and settings. David Game College responds to students who may be targeted or influenced to participate in radicalism or extremism. We also ensure that we can "demonstrate activity", as required by the statutory guidance, in the following key areas: risk assessment, working in partnership, staff training and IT policies.

**Online safety and the use of Social Media:** Social media is an increasingly influential part of life particularly for young people. It has been identified as an important tool in the sharing of extreme material and extremist groups are actively using social media to inform, share propaganda, radicalise and recruit for their cause. Social media safeguarding is an important element of protecting young people from extremist narratives and Prevent can play an active part in this process.

**Extremists are encouraged to:** 'Invade' social network sites such as Facebook (Meta) by setting up groups with radical views and to seek to gather users with the 'right' attitude; 'Invade' file-sharing sites like YouTube by placing various clips with extreme content and infiltrate popular Islamist websites in order to attempt to convert them into militant sites in line with the closed websites by spreading extremist contents on the discussion of forums of these sites.

Through their provision of SMSC Development David Game College enables students to develop their self-knowledge, self-esteem and self-confidence. Our College promotes respect for other people and enables students to acquire an appreciation of and respect for their own and other cultures and cultural traditions. Personal development is promoted, so that students are well prepared and contribute to wider society. This includes:

- Enabling students to distinguish right from wrong and to respect the civil and criminal law of England; Encouraging students to accept responsibility for their behaviour, show initiative, and to understand how they can contribute positively to the lives of those living and working in the locality of the College and to society more widely;
- Enabling students to acquire a broad general knowledge of and respect for public institutions and services in England and encouraging respect for democracy and support for participation in the democratic processes, including respect for the basis on which the law is made and applied in England.

**Child Protection:** Staff at David Game College are alert to the fact that whilst Extremism and Radicalisation is broadly a safeguarding issue there may be some instances where a child or children may be at direct risk of harm or neglect. For example; this could be due to a learner displaying risky behaviours in terms of the activities they are involved in or the groups they are associated with or staff may be aware of information about a learner's family that may equally place a child at risk of harm. Therefore all adults working in David Game College including visiting staff, volunteers, contractors, and students on placement) are required to report instances where they believe a child may be at risk of harm or neglect to the Designated Safeguarding Lead. In David Game College our Safeguarding reporting arrangements are set out fully in our Safeguarding

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Policy.

**Role of the Prevent Officer & the Designated Safeguarding Lead:** The Designated Safeguarding Lead (DSL)/Prevent Officer along with the Deputy DSLs/Prevent Officers work in line with the responsibilities as set out in the DfE Guidance 'Keeping Children Safe in Education'. They are our internal lead staff regarding the *Prevent* strand of the Government's counter-terrorism, anti-radicalisation and strategy.

**Training:** Whole College in-service training on Prevent as part of safeguarding is organised for staff and the senior management annually by the Prevent Officer. All training comes from an accredited provider at least every year. Online training is also considered a useful back-up. The key areas to be included in the training can be found in the Preventing Extremism FAQ and include:

- what *Prevent* is, what extremism and radicalisation are;
- confidence to identify children at risk of being drawn into terrorism and understand how people may be drawn into terrorism;
- confidence to challenge extremist ideas which can be used to legitimise terrorism and are shared by terrorist groups;
- how messages are spread; the role of the internet and social media – online safety;
- what Colleges and childcare providers must do to comply with the *Prevent* duty;
- Support for individuals at risk and how and where to refer children and young people for further help

**Reporting Concerns:** Our Prevent Officer and DSL can provide advice and support to other members of staff on protecting children from the risk of radicalisation. Our College ensures staff understand what radicalization and extremism mean and why people may be vulnerable to being drawn into terrorism. We ensure staff have the knowledge and confidence to identify children at risk of being drawn into terrorism, and to challenge extremist ideas which can be used to legitimize terrorism. **Staff safeguard and promote the welfare of children and know where and how to refer children and young people identified as being at risk of radicalization for further help to our Prevent Officer who will consider the most appropriate referral which could include Channel or Children's Social Care.** Details of our Local Authority *Prevent* Lead who can give support and advice for the prevention of radicalization are available at the top of this policy. Staff are trained at two INSET meetings per year in which Prevent training and discussion are organised and staff are clearly instructed in who to report concerns to and what types of behaviours are associated with some child becoming radicalised.

**Working in partnership with other agencies and information-sharing:** In line with the safeguarding arrangements sent out by the City of London, David Game College co-operates productively with our local *Prevent* co-ordinators, the City of London Police and existing multi-agency forums, for example Community Safety Partnerships on all matters regarding safeguarding and preventing extremism. We ensure information is shared appropriately.

**Teaching Approaches:** We will all strive to eradicate the myths and assumptions that can lead to some students becoming alienated and disempowered, especially where the narrow approaches students may experience elsewhere may make it harder for them to challenge or question these radical influences, this guidance and support is delivered in tutorials. We ensure that all of our support and approaches will help our students build resilience to extremism and give them a positive sense of identity through the development of critical thinking skills. We are flexible enough to adapt our teaching approaches, as appropriate and address specific issues so as to become even more relevant to the current issues of extremism and radicalisation. In doing so we follow the three broad categories of:

- making a connection with children through positive engagement and a learner centred approach;
- facilitating a "safe space" in which children, young people and staff can understand the risks associated with terrorism and develop the knowledge and skills to be able to challenge extremist arguments; and
- equipping our children with the appropriate skills, knowledge, understanding and awareness for resilience.

Therefore, this approach will be embedded within the ethos of our College so that students know and understand what safe and acceptable behaviour is in the context of extremism and radicalisation. This will work in conjunction with our College's approach to the spiritual, moral, social and cultural development of children. Our goal is to build mutual respect and understanding and to promote the use of dialogue not violence as a form of conflict resolution. We will achieve this by using an approach that includes: PSHEE programmes; open discussion and debate; work on anti-violence and a restorative approach to conflict resolution; and targeted programmes. SMSC development is embedded into the life of our College.

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We also work with local partners, families and communities in our efforts to ensure our College understands and embraces our local context and values in challenging extremist views and to assist in the broadening of our student's experiences and horizons. We help support children who may be vulnerable to such influences as part of our wider safeguarding responsibilities and where we believe a learner is being directly affected by extremist materials or influences we will ensure that that learner is offered mentoring. Additionally, in such instances our College will seek external support from the Local Authority and/or local partnership structures working to prevent extremism.

At David Game College we promote the values of democracy, the rule of law, individual liberty, mutual respect and tolerance for those with different faiths and beliefs. We will teach and encourage children to respect one another and to respect and tolerate difference, especially those of a different faith or no faith. It is indeed our most fundamental responsibility to keep our children safe and prepare them for life in modern multi-cultural Britain and globally.

### **Specific Duties of Staff**

All members of staff have a specific duty and responsibility with regard to combating extremism. The Teachers' Standards (July 2011) clearly shows this professional responsibility in Part 2:

- Showing tolerance of and respect for the rights of others;
- Not undermining fundamental British values, including democracy, the rule of law, individual liberty and mutual respect, tolerance of those of different faiths and beliefs;
- Ensuring that personal beliefs are not expressed in ways that exploit students' vulnerability or might lead them to break the law
- Provide a safe environment and space where students can discuss ideas and controversial issues openly and freely
- Providing skills and knowledge to explore political and social issues critically, to weigh evidence, debate and make reasoned arguments
- As part of the PSHE and SMSC curriculum, staff educate child about the dangers of stereotyping, generalizing about group of people and what hate and discrimination/marginalization can lead to. Talks are given to students on specific periods of history that led to massacres and genocide. The Middle Passage is explored as example of dehumanizing people as well the Holocaust and more recent examples of ethnic cleansing and hate crimes as well as terrorist actions, including the growth of Islamic and non- Islamic terrorist groups.
- Students are also taught the importance of rationality in their thinking and the dangers of misinformation, disinformation, propaganda and deliberate attempts to spread rumors and conspiracy theories.

An important resource for staff is the web site **educate against hate** [www.educateagainsthate.com](http://www.educateagainsthate.com)

### **What is expected from teachers?**

As with all other policies, the Prevent Duty should not be burdensome and students should not overly notice elements of its implementation outside the promotion of British Values and tolerance of others. The main purpose of the Prevent Strategy is to build children's resilience to radicalisation by providing a safe environment for debating controversial issues and helping them to understand how they can influence and participate in decision-making. To this end, the Prevent Strategy and the Prevent Duty are fundamentally integrated into safeguarding, SMSC and by association, the curriculum and acceptable and safe use of IT and the Web. **The Prevent duty does not require teachers to carry unnecessary intrusion into family life but as with any other safeguarding risk they must take action when they observe behaviour that causes concern. The College has a strict leaflet policy, which states that leaflets can only be distributed if they have been first approved by the Co-Principals. Any teacher that notices students attempting to distribute material that undermines British Values must report this to the Prevent Lead or one of the Leadership Team.**

**It is also important to remember that Prevent is not just aimed at students - staff can also be reported if they are trying to influence students or other staff in a manner that is contrary to Prevent values.**

**All teachers are required to meet the Teachers' Standards, and specifically in relation to the Prevent Duty, to meet Part Two of the standards, which deals with personal and professional conduct. Teachers are expected to "uphold public trust in the profession and maintain high standards of ethics and behaviour, within and outside of College".**

Where appropriate, teachers will be expected to promote British values:

- **Democracy**
- **The rule of law**
- **Individual liberty**
- **Mutual respect**
- **Tolerance of different faiths and beliefs**

Challenging any opinions or behaviour that would undermine British values and reporting any concerns about comments, and behaviour that would suggest a student is being radicalised to a designated child safeguarding officer or the person specifically responsible for Prevent implementation (John Dalton). Teachers are expected to assimilate British values into the curriculum. If the curriculum is defined as everything a pupil learns about in College, it is clear that Prevent is not just limited to the formal curriculum and includes SMSC and extra-curricular activities, for example: assemblies, clubs, societies, events and the Student Council.

There is no single way to identify an individual who is likely to be susceptible to terrorist ideology. As with other safeguarding risks, staff should be alert to changes in children's behaviour, which may indicate they need help or protection. Children at risk of radicalisation may display different signs or seek to hide their views. It is up to staff to use their professional judgment and act **proportionately**. The latter is critical in implementing the Prevent Duty as it is very easy to over-react and restrict a pupil's ability to engage in banter, make jokes, or discuss topics that have a ubiquitous presence in the media.

#### **Examples of possible concerning behaviour:**

- The vocalisation of extreme opinions - especially of a religious or political bent
- Students who seek to *strongly* persuade others of their views (especially if these views undermine British values) in or outside of the classroom
- Students attempting to distribute leaflets whose content is against British Values or that which seeks to promote directly or indirectly extremist views
- Students whose behaviour significantly changes for no obvious reason
- Students who demonstrate a strong opposition to British values in their communications
- Sudden conversion to a new religion
- Embracing major conspiracy theories
- Becoming abusive to other students who are different

Teachers must not promote partisan political views in the teaching of any subject and should provide a balanced presentation of ideas. If a teacher believes that one of their students is vulnerable to or is being subject to external or internal influences that may lead to radicalisation, then they must inform the Prevent representative, John Dalton or the designated Safeguarding officers.

#### **Training**

It is responsibility of the College and the designated Prevent contact, John Dalton, to ensure that staff are trained so that everyone has the capability to deal with the risk of radicalisation, and more specifically to help staff:

- Develop an understanding of what radicalisation means and why students might be vulnerable to it
- Understand what is meant by extremism?
- Understand the relationship between extremism and terrorism
- Understand the measures that are able to prevent people from becoming drawn into terrorism
- Understand what is Prevent and what is Channel – how are they effective and what is their purpose
- Understand how to challenge extremist ideology
- Understand how to obtain support and report or make a referral
- Understand the signals and contextual understanding
- Keep staff updated of new and emerging threats
- Training for all staff to at least Safeguarding level 2

**Use of External Agencies and Speakers:** Our College encourages the use of external agencies or speakers to enrich the experiences of our students, however we will positively vet those external agencies, individuals or speakers who we engage  
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to provide such learning opportunities or experiences for our students. We comply with KCSIE paragraph 43 and prevent people who pose a risk of harm from working with children. We adhere to statutory responsibilities and check staff who work with students, taking proportionate decisions on whether to ask for any checks beyond what is required. We ensure that volunteers are appropriately supervised. Such vetting is to ensure that we do not unwittingly use agencies that contradict each other with their messages or that are inconsistent with, or are in complete opposition to, our College's values and ethos. We must be aware that in some instances the work of external agencies may not directly be connected with the rest of the College curriculum so we need to ensure that this work is of benefit to students. Our College will assess the suitability and effectiveness of input from external agencies or individuals to ensure that:

- Any messages communicated to students are consistent with the ethos of the College and do not marginalise any communities, groups or individuals;
- Any messages do not seek to glorify criminal activity or violent extremism or seek to radicalise students through extreme or narrow views of faith, religion or culture or other ideologies;
- Activities are matched to the needs of students and
- Activities are carefully evaluated by Colleges to ensure that they are effective.

David Game College records formal checks in the SCR by reference to the statutory regulations currently in force. By delivering a broad and balanced tutorial programme, augmented by the use of external sources where appropriate, we strive to ensure our students recognise risk and build resilience to manage any such risk themselves where appropriate to their age and ability but also to help students develop the critical thinking skills needed to engage in informed debate.

**Whistle Blowing:** Where there are concerns of extremism or radicalisation students and staff will be encouraged to make use of our internal systems to Whistle Blow or raise any issue in confidence. They must inform the Headteacher straight away (or if it relates to the Headteacher, inform Local Authority Designated Officer whose contact details are stated early in the child protection policy).

**Recruitment:** The arrangements for recruiting all staff, permanent and volunteers, to our College will follow guidance for safer recruitment best practice in education settings, including, but not limited to, ensuring that DBS checks are always made at the appropriate level, that references are always received and checked and that we complete and maintain a single central record of such vetting checks. We apply safer recruitment best practice principles and sound employment practice in general and in doing so will deny opportunities for inappropriate recruitment or advancement. We are alert to the possibility that persons may seek to gain positions within our College so as to unduly influence our College's character and ethos. We are aware that such persons seek to limit the opportunities for our students thereby rendering them vulnerable to extremist views and radicalisation as a consequence. Therefore, we adhere to safer recruitment practice.

**Role of the Proprietor:** The Proprietor undertakes appropriate training to ensure that they are clear about the role and the parameters of their responsibilities as Proprietor, including the statutory safeguarding duties. The Proprietor also supports the ethos and values of our College and supports tackling extremism and radicalisation. In line with the provisions set out in the DfE guidance 'Keeping Children Safe in Education, 2021' the Proprietor challenges the College's senior management team on the delivery of this policy and monitors its effectiveness. The Proprietor reviews this policy annually and may amend and adopt it outside of this timeframe in accordance with any new legislation or guidance or in response to any quality assurance recommendations pertaining to the delivery of this policy and the overall safeguarding arrangements made.

### **The Prevent Strategy and the Channel Programme Frequently asked questions (FAQs)**

**What is the Prevent strategy?** Prevent is the Government's strategy to stop people becoming terrorists or supporting terrorism, in all its forms. Prevent works at all the pre-criminal stages by using early intervention to encourage individuals and communities to challenge extremist and terrorist ideology and behaviour.

**What is Channel?** Channel is a key element of the Prevent strategy. It is a multi-agency approach to protect people at risk from radicalisation. Channel uses existing collaboration between local authorities, statutory partners (such as the education and health sectors, social services, children's and youth services and offender management services), the police and the local community to:

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- identify individuals at risk of being drawn into terrorism and assess the nature and extent of that risk
- develop the most appropriate support plan for the individuals concerned.

Channel is about safeguarding children and adults from being drawn into committing terrorist-related activity. It is about early intervention to protect and divert people away from the risk they face before illegality occurs.

Channel is one tactical option employed by Prevent and has recently been placed on a statutory footing. To understand more about the Channel Programme further information can be found here – [www.gov.uk/government/publications/channel-guidance](http://www.gov.uk/government/publications/channel-guidance)

**Who can make a referral?** Anyone can make a referral. Referrals have come from a wide range of partners: Social services, children and adult services, health, police, education and youth offending teams.

**What happens with the referral?** Each referral is screened for suitability via a preliminary assessment undertaken by the Police Channel coordinator and the local authority. If suitable, the case is discussed with all relevant partners to decide if an intervention is necessary.

**Will the Individual be Informed about the Channel referral?**

If an individual is deemed to require a Channel intervention, they must be told prior to receiving an investigation. The process will be carefully managed with the referring agency.

**Who sits on the Channel Panel?** The Channel Panel is chaired by the local authority and includes Police, statutory partners and non-statutory partners, where appropriate. Lead Safeguarding professionals will be invited on a case by case basis.

**Who delivers Channel?** Channel interventions are delivered through local partners and specialist agencies. Support could include mainstream health, education, employment or housing services through to specialist mentoring or faith guidance and wider diversionary activities such as sporting activities.

**What do you do if you have escalating concerns?** If you believe that someone is vulnerable to being exploited or radicalised, please follow the established safeguarding procedures in your organisation to escalate concerns to the appropriate people who can refer concerns to Channel as appropriate.

**‘Key Ingredients’ for successful teaching in the context of ‘push’ and ‘pull’ factors.**

<b>PUSH FACTORS</b> -factors that push an individual/make an individual vulnerable to extremist messages	<b>KEY INGREDIENTS</b>	<b>PULL FACTORS</b> -factors that draw children into extremist messages
Lack of excitement; frustration	<b>Teacher confidence</b> in many cases it will be the use of existing teaching skills and methods which may well be the most effective approach	Charismatic/confident individuals (recruiters)
Lack of sense of achievement- seen as significant. ‘Lack of purpose’/confidence in the future, life goals.	<b>Teacher attitudes and behaviours</b> Willingness to admit you don’t know; acknowledging controversial issues exist; awareness that you have a role to play; willingness to turn to others for help when you don’t know about something.	Networks/sense of belonging
Lack of an outlet for views	<b>Specific knowledge</b> Understanding other cultures and religions as well as alternative values and beliefs (whilst being careful to avoid ‘othering’)	Broader community views which enable or do not oppose extremism

	Knowledge of an alternative values framework	
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Gaps in knowledge or understanding for both children and their parents	<b>Teaching practice/pedagogy:</b> Boosting critical thinking (seeing through propaganda, singular messages etc.) Helping to see multiple perspectives Using multiple resources/methods Embedding or sustaining dialogue following specialist interventions Enabling students to tackle difficult issues Linking College work to the wider community Drawing evidence from across the curriculum Developing in children a sense of multiple identities, help children become aware of and comfortable with, multiple personal identity	Persuasive, clear messages. Exploiting knowledge gaps
Sense of injustice		
Actual or perceived humiliating experiences (including bullying, racial discrimination as well as perceived humiliating experiences. Perhaps linked closely to sense of injustice).		
Exclusion - lack of belonging to peer or community networks, associations, etc.		
		Sense of dignity and importance and loyalty
Disruptive home life	Support from Senior Leaders	Exciting (non-teaching) activities
Disaffection with wider societal issues	Pupil support processes	Sense of purpose in life

**Identification and referral of concern to the College or the Designated Safeguarding Lead**



**Screening Process** Police Channel Lead conducts discreet enquiry to establish whether the referral is indeed legitimate

**Checking Process** Police check to ensure referral is not subject to live investigation



The Local Authority Prevent

**Communicate the decision to referrer and forward the referral to existing**

For example:

### Prevent & Safeguarding Self-Assessment

Everyone who comes into contact with children and their families has a role to play in safeguarding children. Colleges have a duty of care to their students and staff which includes safeguarding them from the risk of being drawn into terrorism - this includes not just violent extremism but also non-violent extremism, which can create an atmosphere conducive to terrorism and can popularise views which terrorists exploit. Colleges should be safe spaces in which children and young people can understand and discuss sensitive topics, including terrorism and the extremist ideas that are part of the terrorist ideology and learn how to challenge these ideas.

College staff are particularly important as they are able to identify concerns early and provide help for children, to prevent concerns from escalating. Colleges and Colleges and their staff form part of the wider safeguarding system for children. This system is described in statutory guidance *Working Together to Safeguard Children* (March 2013) and *Keeping Children Safe in Education* (October 2014). Colleges should work with social care, the police, health services and other services to promote the welfare of children and protect them from harm. Radicalisation is listed as a specific safeguarding issue within this statutory guidance and is addressed within the Government's Prevent Strategy. The Counter-Terrorism and Security Act 2015 places a duty on Colleges to 'have "due regard to the need to prevent people from being drawn into terrorism"'.

### The Prevent Strategy has three main objectives:

- Respond to the **ideological challenge** of terrorism & the threat we face from those who promote it;
- **Prevent people from being drawn into terrorism** and ensure that they are given appropriate advice and support;
- Work with **sectors and institutions** where there are risks of radicalisation which we need to address.

This self-assessment tool has been developed to aid compliance with the Prevent Duty as a health check for the Senior Leadership Team within the College to assess if Prevent has been adopted into their institution's mainstream processes. This will identify if their institution requires any advice and support from their local Prevent Team or partner agencies to reduce their vulnerability.

Prevent Self-Assessment				
Objective: Adoption of Prevent into Mainstream Processes				
Governance				
No		Owner	Evidence	RAG Status
1.1	Does the Institution have a nominated Staff (and Governor) Prevent Lead?			
Risk Assessment				
No		Owner	Evidence	RAG
2.1	Do the Senior Leadership team and Governors have an understanding, shared with partners, of the potential risk in the local area to assess the risk of students being drawn into terrorism, including support for the extremist ideas that are part of terrorist ideology?			
2.2	Is Prevent included within the Institution's Safeguarding Policy?			
2.3	Is Prevent included within the Institution's Safer Recruitment Policy?			
2.4	Is Prevent included within the Institution's venue hiring policy? Are due diligence checks conducted on groups/individuals seeking to hire/use College premises?			
2.5	Is Prevent included within the Institution's Visitors Policy? Are due diligence checks conducted on visitors to the College? Does the policy set out clear protocols for ensuring that any visiting speakers – whether invited by staff or by students themselves – are suitable and appropriately supervised within College?			
2.6	Is Prevent included within the Institution's Contractors Policy? Are due diligence checks conducted on contractors working at the College or providing extracurricular activities? Does the policy set out clear protocols for ensuring that any visiting contractors are suitable and appropriately supervised within College?			
2.7	Is Prevent an agenda item of relevant meetings / planning processes?			
2.8	Is there a clear referral route for vulnerable individuals to receive support through the Channel process?			
2.9	Are fundamental British Values promoted in the delivery of the curriculum and extra-curricular activities and reflected in the general conduct of the College?			

<b>Working In Partnership</b>				
<b>No</b>		<b>Owner</b>	<b>Evidence</b>	<b>RAG</b>
3.1	Does the Institution have engagement with wider Prevent work through their local Prevent Partnership?			
3.2	Is Prevent included within Information sharing protocols / MOU?			
3.3	Is the Institution included in an agreed Prevent Partnership Communication Policy?			
3.4	Do the safeguarding arrangements take into account the procedures and practice of the local authority as part of the inter-agency safeguarding procedures set up by the Local Safeguarding Children Board (LSCB)?			
3.5	Do the child protection policies describe procedures which are in accordance with government guidance and refer to locally agreed inter-agency procedures put in place by the LSCB?			
<b>Staff Training</b>				
<b>No</b>		<b>Owner</b>	<b>Evidence</b>	<b>RAG</b>
4.1	Does the Institution have an annual policy and training review process in place?			
4.2	Does the institution regularly assess Prevent Training needs to raise their awareness of Prevent issues with staff and the Governing body? Do staff members have sufficient training to give them the knowledge and confidence to identify children at risk of being drawn into terrorism and challenge extremist ideas which can be used to legitimise terrorism and are shared by terrorist groups?			
4.3	Are staff members aware of Prevent issues and the referrals process into the Channel process?			
<b>Safety Online</b>				
<b>No</b>		<b>Owner</b>	<b>Evidence</b>	<b>RAG</b>
5.1	Does the College IT system have appropriate levels of filtering to ensure children are safe from terrorist and extremist material when accessing the internet in College?			
5.2	What processes and procedures are in place to ensure children use the internet responsibly?			
5.3	Do staff, students and carers receive any Internet Safety awareness training?			

## **Annex B- Indicators**

### **Vulnerability**

- Identity Crisis - Distance from cultural/ religious heritage and uncomfortable with their place in the society around them
- Personal Crisis – Family tensions; sense of isolation; adolescence; low self-esteem; disassociating from existing friendship group and becoming involved with a new and different group of friends; searching for answers to questions about identity, faith and belonging
- Personal Circumstances – Migration; local community tensions; events affecting country or region of origin; alienation from UK values; having a sense of grievance that is triggered by personal experience of racism or discrimination or aspects of Government policy
- Unmet Aspirations – Perceptions of injustice; feeling of failure; rejection of civic life
- Criminality – Experiences of imprisonment; poor resettlement/ reintegration, previous involvement with criminal groups

### **Access to extremism / extremist influences**

- Is there reason to believe that the child/young person associates with those known to be involved in extremism - either because they associate directly with known individuals or because they frequent key locations where these individuals are known to operate? (e.g. the child/young person is the partner, spouse, friend or family member of someone believed to be linked with extremist activity)
- Does the child/young person frequent, or is there evidence to suggest that they are accessing the internet for the purpose of extremist activity? (e.g. Use of closed network groups, access to or distribution of extremist material, contact associates covertly via Skype/email etc.)
- Is there reason to believe that the child/young person has been or is likely to be involved with extremist/ military training camps/ locations?
- Is the child/young person known to have possessed or is actively seeking to possess and/ or distribute extremist literature/ other media material likely to incite racial/ religious hatred or acts of violence?
- Does the child/young person sympathise with, or support illegal/illicit groups e.g. propaganda distribution, fundraising and attendance at meetings?
- Does the child/young person support groups with links to extremist activity but not illegal/illicit e.g. propaganda distribution, fundraising and attendance at meetings?

### **Experiences, Behaviours and Influences**

- Has the child/ young person encountered peer, social, family or faith group rejection?
- Is there evidence of extremist ideological, political or religious influence on the child/ young person from within or outside UK?
- Have international events in areas of conflict and civil unrest had a personal impact on the child/ young person resulting in a noticeable change in behaviour? It is important to recognise that many people may be emotionally affected by the plight of what is happening in areas of conflict (i.e. images of children dying) it is important to differentiate them from those that sympathise with or support extremist activity
- Has there been a significant shift in the child/ young person's behaviour or outward appearance that suggests a new social/political or religious influence?
- Has the child/ young person come into conflict with family over religious beliefs/lifestyle/ dress choices?
- Does the child/ young person vocally support terrorist attacks; either verbally or in their written work?
- Has the child/ young person witnessed or been the perpetrator/ victim of racial or religious hate crime or sectarianism?

### **Travel**

- Is there a pattern of regular or extended travel within the UK, with other evidence to suggest this is for purposes of extremist training or activity?
- Has the child/ young person travelled for extended periods of time to international locations known to be associated with extremism?

- Has the child/ young person employed any methods to disguise their true identity? Has the child/ young person used documents or cover to support this?

#### **Social Factors**

- Does the child/ young person have experience of poverty, disadvantage, discrimination or social exclusion?
- Does the child/ young person experience a lack of meaningful employment appropriate to their skills?
- Does the child/ young person display a lack of affinity or understanding for others, or social isolation from peer groups?
- Does the child/ young person demonstrate identity conflict and confusion normally associated with youth development?
- Does the child/ young person have any learning difficulties/ mental health support needs?
- Does the child/ young person demonstrate a simplistic or flawed understanding of religion or politics?
- Does the child/ young person have a history of crime, including episodes in prison?
- Is the child/young person a foreign national, refugee or awaiting a decision on their immigration/ national status?
- Does the child/ young person have insecure, conflicted or absent family relationships?
- Has the child/ young person experienced any trauma in their lives, particularly any trauma associated with war or sectarian conflict?
- Is there evidence that a significant adult or other in the child/young person's life has extremist view or sympathies?

#### **More critical risk factors could include:**

- Being in contact with extremist recruiters
- Articulating support for extremist causes or leaders
- Accessing extremist websites, especially those with a social networking element
- Possessing extremist literature
- Using extremist narratives and a global ideology to explain personal disadvantage
- Justifying the use of violence to solve societal issues
- Joining extremist organisations
- Significant changes to appearance and/or behaviour

#### **Vulnerability Factors**Engagement factors

- 1. Grievance/Injustice:** Engagement with an extremist group, cause or ideology meets needs to express or act on feelings of anger, grievance or injustice.
- 2. Threat:** The individual feels that their family, identity, culture or values are under threat and an extremist group or cause offers a vehicle to articulate these threats and defend against them.
- 3. Identity, meaning and belonging:** The individual uses the group, cause or ideology to provide a clear sense of identity, meaning and belonging.
- 4. Status:** Some individuals use extremist groups, causes or ideologies to provide a sense of status and superiority.
- 5. Excitement, comradeship or adventure:** Some individuals use extremist groups, causes or ideologies to fulfil a desire for excitement, comradeship or adventure.
- 6. Dominance and control:** Some individuals use extremist groups, causes or ideologies to dominate and control others.
- 7. Susceptibility to indoctrination:** Some individuals accept the ideology, beliefs and doctrine of an extremist group or cause uncritically and without question.
- 8. Political/moral motivation:** Engagement with an extremist group, cause or ideology is motivated by a desire to bring about political or moral change.
- 9. Opportunistic involvement:** Engagement with an extremist group, cause or ideology can be motivated by self-interest rather than a political or moral cause.

*David Game College is committed to safeguarding and promoting the welfare of children and young people and expects all staff and volunteers to share this commitment. It is our aim that all children fulfil their potential*  
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- 10. Family and/or friends support extremist offending:** Some individuals' engagement with an extremist group, cause or ideology can be supported or condoned by family or friends.
- 11. Transitional periods:** Some individuals engage with an extremist group, cause or ideology at a transitional time in their lives.
- 12. Group influence and control:** Some individuals are members of extremist groups that impose a significant level of influence and control over their behaviour and conduct.
- 13. Mental health:** Mental health problems can contribute to individuals' engagement with groups, causes or ideologies.

#### Intent factors

- 14. Over-identification with a group, cause or ideology:** Some individuals over-identify with a group, cause or ideology to the extent that they lose their own identity and sense of agency.
- 15. Them and Us thinking:** Some individuals divide the world into an out-group of persecutors and an in-group of persecuted individuals with whom they identify and whose cause they have adopted.
- 16. Dehumanization of the enemy:** Individuals can dehumanize members of the out-group and believe they should be purged or punished.
- 17. Attitudes that justify offending:** This factor applies where individuals hold attitudes or beliefs that support and justify offending on behalf of their group, cause or ideology.
- 18. Harmful means to an end:** Individuals may be prepared to commit serious or significant harm to realize extremist goals.
- 19. Harmful objectives:** Some individuals hold objectives that are inherently harmful.

#### Capability factors

- 20. Individual knowledge, skills and competencies:** Some individuals have specific knowledge, skills and competencies to contribute to or commit offences that could cause serious and significant harm.
- 21. Access to networks, funding or equipment for terrorism:** Some individuals have access to networks, funding or equipment that can help them support or commit a terrorist offence that could cause serious or significant harm.
- 22. Criminal capability:** Where individuals have a criminal history, which can provide a level of capability for extremist offending.

**If you have any concerns discuss them with your Safeguarding Lead and local Prevent Officer**

**Annex C - College Prevent Duty Action Plan Template**

Area of responsibility	Actions to be taken	Outcome	Deadline	Update
Leadership and values	<p>Creation of a 'Statement of Values' that respects learner and staff diversity, encourages freedom and openness and promotes learner voice</p> <p>Development of rigorous recruitment policies which include core College values</p> <p>Key individuals are appointed amongst governors, managers and staff with responsibility for safeguarding and understanding the risk of extremism/radicalisation</p> <p>Inclusion of radicalisation or extremism within the corporate risk register and the maintenance of an up to date risk assessment</p>	<p>A safe learning environment is created across the College, behaviours which harm the ability of different individuals and groups to work together are challenged</p> <p>All new staff are aware of the College's expectations and subscribe to its values</p> <p>The College leadership takes ownership of extremism and radicalisation concerns and appropriate oversight is provided</p> <p>Extremism/radicalisation is considered as a risk at a leadership level within the organisation with concerns relating to hate crime/harassment, extremism and radicalisation being reported promptly to SLT</p>	Complete August 2020	2022
Partnership	<p>Creation of a single point of contact for radicalisation and extremism enquiries internally and arrangements to coordinate information sharing between different departments and curriculum areas</p> <p>Development of links with other Colleges on the agenda</p> <p>Development of links between key College staff/governors and external partners, including the Local Authority and Police</p>	<p>College communications and the sharing of concerns relating to extremism or radicalisation are coordinated effectively</p> <p>The College is able to benefit from existing best practice and resources</p> <p>The College shares information and is able to access statutory assistance where necessary to support vulnerable individuals</p>	Ongoing	

Area of responsibility	Actions to be taken	Outcome	Deadline	Update
Safeguarding and pastoral care	<p>Inclusion of radicalisation and extremism within safeguarding policy and procedure including a reference to the Channel process</p> <p>Development and implementation of rolling cross-organisation training plan to increase organisational awareness</p> <p>Consideration of a College safeguarding panel to assess and manage concerns relating to extremism and radicalisation</p> <p>Inclusion of a whistle blowing mechanism within the safeguarding procedures</p> <p>Inclusion of sub-contracted education providers within the safeguarding procedures</p>	<p>All are aware of the safeguarding procedure and that radicalisation is included within it</p> <p>All understand what is meant by the terms radicalisation and extremism and are comfortable sharing concerns about radicalisation and extremism</p> <p>A whole College approach is taken to the support of learners who may be vulnerable to violent extremist radicalisation</p> <p>Staff feel confident and protected in raising any concerns which may place the safety of learners at risk</p> <p>Learners are protected whilst they are studying or working externally to the College</p>	Existing	Continuous
Student and learner resilience	<p>Include activities within existing lesson structure to enhance student and learner resilience for example, internet safety sessions and activities to improve critical thinking skills</p> <p>Raise awareness and confidence amongst tutors and enrich colleagues about the importance of critical thinking skills</p> <p>Raise awareness of all colleagues and students or learners about their personal responsibility in the online space, particularly around freedom of speech</p> <p>All staff receive appropriate training to educate and challenge on the principals of mutual respect and tolerance and encourage democratic participation</p> <p>Opportunities to promote values are identified and utilised within the curriculum and within enrichment activities</p>	<p>Students and learners have good critical engagement skills and understand how to verify information online and the reasons why they should</p> <p>Students and learners feel comfortable sharing any concerns they have about behaviour or information in the online space with colleagues at the College</p> <p>All are aware of their individual responsibilities in the online space, especially regarding freedom of speech</p> <p>All learners are encouraged to respect others with particular regard to protected characteristics and are educated in the options for civic engagement</p> <p>Learners understand what the College values mean in practice</p>	Ongoing	o

Area of responsibility	Actions to be taken	Outcome	Deadline	Update
Internet safety	<p>Inclusion of reference to terrorist and/or extremist material within ICT code of conduct, together with protections for legitimate study of this material</p> <p>Deliver awareness raising training to library and ICT colleagues about what terrorist and extremist material looks like</p> <p>Raise awareness of colleagues and students or learners about updated code of conduct, reasons why and an explanation of how the policy was developed</p> <p>Appropriate filtering is in place to ensure that learners are unable to access terrorist and extremist material online through College servers</p>	<p>Colleagues understand what terrorist/extremist material looks like and are confident to share concerns through the appropriate processes if they do encounter access to this material</p> <p>Learner study of extremist and terrorist material for legitimate purposes is protected</p> <p>Students and learners understand the risks attached to accessing terrorist and extremist material online and understand the institution's duty and process in these areas</p> <p>Learners are safe from accessing extremist or terrorist materials whilst using College servers</p>	Ongoing	2022 – revisions required
Reputation and brand	<p>Development of policies which outline when the College's branding can be used and the responsibilities which come with its use</p> <p>Development of a protocol for monitoring the College's online presence which includes reference to terrorism and extremism</p> <p>Delivery of awareness raising training to communications colleagues</p> <p>Delivery of awareness raising to all administration, teachers and students or learners advising of responsibility in the online space</p>	<p>Any references to the College online are picked up quickly and referred for action if they have links to terrorist/extremist material</p> <p>College administration, tutors and learners are aware of their responsibility in the online space regarding the College's brand and reputation</p>	Ongoing	Ongoing

Area of responsibility	Actions to be taken	Outcome	Deadline	Update
College Environment	<p>Development of policies governing events organised by staff, learners or visitors on College premises</p> <p>Creation of a code of conduct policy and communication plan for setting expectations on learner behaviour</p> <p>Development of a policy governing the display of materials internally at the College</p> <p>Development of a protocol to manage the layout, access and use of any space provided for the purposes of prayer and contemplation including an oversight committee or similar</p>	<p>The College does not host events or speakers supportive of, or conducive to, terrorism</p> <p>Learners are aware of the conduct expected by the College in creating a safe space for all groups on site</p> <p>A safe learning space is created, avoiding the display of inappropriate materials</p> <p>Prayer and contemplation space is accessible to all learners on an equal basis and the College is aware of and able to manage any risks associated with the space</p>	Ongoing	Revisions required in 2022

### Legal and Best Practice Status

- This policy complies with Part 2, paragraphs 5 (a) to (e) inclusive of the Education (Independent College Standards) (England) Regulations 2015), and other relevant and current regulations and any other guidance to which Colleges are obliged to have regard.
- In adhering to this policy, and the procedures therein, staff and visitors contribute to the College's delivery of the outcomes to all children, as set out in s10 (2) of the Children's Act 2004. This Preventing Extremism and Radicalisation Safeguarding Policy is one element within our overall College arrangements to Safeguard and Promote the Welfare of all Children in line with our statutory duties set out at s175 of the Education Act 2002.
- Our College's Preventing Extremism and Radicalisation Safeguarding Policy also draws upon the guidance contained in *Keeping Children Safe in Education (KCSIE)* (DfE: September 2019); *Working Together to Safeguard Children (WT)* A guide to inter-agency working to safeguard and promote the welfare of children (HM Government: 2015 and also Resources 'Learning Together to be Safe', 'Prevent: Resources Guide', 'Tackling Extremism in the UK', DfE's 'Teaching Approaches that help Build Resilience to Extremism among Young People' and Peter Clarke's Report
- [Prevent Duty Guidance: for England and Wales](#) (March 2015) (*Prevent*). *Prevent* is supplemented by [The Prevent duty: Departmental advice for Colleges and childminders](#) (June 2015) and [the use of social media for on-line radicalisation](#) (July 2015).
- Department for Education: '*How Social Media Is Used To Encourage Travel To Syria And Iraq: Briefing Note For Colleges.*'

### Related Documents:

- Safeguarding Children – Safer Recruitment Policy; Anti-bullying; E-Safety Policy; Whistleblowing; Behaviour Management including Discipline, Sanctions and Exclusions Policy; Personal Social Health and Economic Education (PSHEE) and Spiritual, Moral, Social and Cultural (SMSC) Development
- [Statutory guidance \(Home Office\)](#) – see paras 1-27 generally and 57-76 for sector specific guidance for Colleges
- [The Prevent Duty: Departmental Advice for Colleges and Childcare Providers \(Department for Education\)](#) <http://www.saferinternet.org.uk/advice-and-resources/teachers-and-professionals/safety-features>  
[https://www.gov.uk/government/uploads/system/uploads/attachment\\_data/file/440450?How\\_social\\_media\\_is\\_used\\_to\\_encourage\\_travel\\_to\\_syria\\_and\\_iraq.pdf](https://www.gov.uk/government/uploads/system/uploads/attachment_data/file/440450?How_social_media_is_used_to_encourage_travel_to_syria_and_iraq.pdf)

## Freedom of Expression Policy 2022-2023 David Game College

### 1. Aim

The aim of this policy is to clarify our responsibility to foster Freedom of Expression in an educational setting within the boundaries of the law and the protections it provides and with consideration of our core values. It is written with reference to the Guidance provided by the Equality and Human Rights Commission on The Legal Framework for Freedom of Expression. <http://www.equalityhumanrights.com/publication/freedom-expression-legal-framework>. It is also linked to the statutory Prevent duty within the Counter Terrorism and Security Act 2015: <http://www.legislation.gov.uk/ukpga/2015/6/contents/enacted> This policy should also be read in association with our Safeguarding policy and Prevent strategy policies. David Game College is committed to freedom of speech, but has a moral and legal obligation to protect its students from those who make seek to undermine British Values and the College must have due regard to the need to prevent individuals being drawn into terrorism.

### 2. Objectives

- 2.1 To clarify the College's responsibility to promote freedom of expression.
- 2.2 To identify the circumstances under which freedom of expression may be legitimately restricted.
- 2.3 To outline the College's responsibilities regarding visiting speakers including external lettings.

### 3. Responsibility to Promote Freedom of Expression

- 3.1 Section 43 of the Education (No 2) Act 1986, places a positive duty on universities and Colleges to take such steps as are reasonably practicable to ensure that freedom of speech within the law is secured for members, students and employees of the establishment and for visiting speakers.
- 3.2 [Freedom of](#) expression is a fundamental right protected under the Human Rights Act 1998 and by Article 10 of the European Convention on Human Rights. It is also protected under the common law.
- 3.3 Protection under Article 10 extends to the expression of views that may shock, disturb or offend the deeply-held beliefs of others.
- 3.4 [Freedom](#) of expression is protected more strongly in some contexts than others. In particular, a wide degree of tolerance is accorded to political speech and debate during election campaigns. See Appendix 1 for more detail about Elections and Referendums.
- 3.5 As a College we are expected to allow open debating of challenging ideas which may need to use controversial resources. Controversial materials should not be left unchallenged by the member of staff using them.
- 3.6 The College has a duty to promote fundamental British Values. These are:
  - democracy
  - the rule of law
  - individual liberty
  - mutual respect
  - tolerance of those of different faiths and beliefs

### 4. Legitimate Restriction on Freedom of Expression

- 4.1 Freedom of expression may be limited in some circumstances and in particular does not protect statements that unlawfully discriminate against or harass, or incite violence or hatred

against, other persons and groups, particularly by reference to their race, religious belief, gender or sexual orientation.

- 4.2 No one can rely on the human right to freedom of expression to limit or undermine the human rights of others.
- 4.3 The College has duties which require us to have due regard to the need to promote good relations between different communities protected by equality law. This may require active challenge to the use of offensive communication and hate speech.
- 4.4 The College also has a duty under the Counter Terrorism and Security Act 2015, to participate fully in work to prevent people from being drawn into terrorism.
- 4.5 Although there is no universally accepted definition, hate speech is generally understood to describe forms of expression which incite violence, hatred or discrimination against other persons and groups, particularly by reference to their ethnicity, religious belief, gender or sexual orientation, language, national origin or immigration status.
- 4.6 David Game College is a secular, educational establishment, regulated by Ofsted and subject to legislation and statutory guidance on matters such as safeguarding children and advancing equality of opportunity. It also falls under the educational oversight of QAA. David Game College reserves the right to monitor any activity associated with David Game College or using its premises, to ensure that it supports the ethos of the College.

## 5. Visiting Speakers and Lettings

- 5.1 The Prevent duties identified in the Counter Terrorism and Security Act 2015, require that the College has oversight of the content of any speeches or presentations by visiting speakers.
- 5.2 Organizers of a visiting speaker presentation should complete a risk assessment which will include any concerns re content of presentations.
- 5.3 The risk assessment must be approved by the organizer's line manager.
- 5.4 If the risk assessment raises concerns, the organizer or their line manager can pass the risk assessment to the Prevent Committee for further scrutiny.
- 5.5 These controls will also be applied to any lettings of our premises by outside organizations.
- 5.6 While challenging and controversial content can be allowed, the College is responsible for ensuring that such views are challenged during a presentation. This may necessitate the presence of a member of College staff at any such presentation even if this is externally organized as a premises letting.
- 5.7 The College is entitled to refuse a request to lease its premises for any use which does not match our core values.
- 5.8 **John Dalton (Prevent Officer) and Dr John Sanders (Director of Higher Education) have the right to block speakers who they feel (with some evidence) might undermine British Values**

<b>Linked Policies:</b>	Prevent Strategy Safeguarding & Child Protection Policy Safeguarding Vulnerable Adults Policy Equal Opportunities Policy Student Behaviour Management Policy Staff Code of Conduct Employee Handbook (Disciplinary & Dismissal Policy) External Lettings Policy and Procedures Visiting Speakers Policy and Guidelines
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DAVID GAME COLLEGE EQUALITY IMPACT ANALYSIS	DATE: January 2022
<b>Function: Equal Opportunities</b>	
<p>This policy, plan, procedure, process has been examined for equality impact, i.e., the impact that this function will have on different groups of actual and potential learners, service users and staff taking account of the protected characteristics of the Equality Act 2010 (<b>age, disability, gender reassignment, marriage and civil partnership, pregnancy and maternity, race, religion or belief, sex, sexual orientation</b>).</p>	
<p>1. <b>If Equality Impact Analysis is not relevant to this function, give reasons and proceed to section 5 below.</b> Not applicable</p>	
<p><b>what ways could this function have a negative impact on any of the groups above? What actions have been taken to eliminate these?</b></p> <p>Lack of understanding of this policy could lead to discriminatory behaviour towards and unnecessary restrictions upon students, visitors or staff members. Training is being organized and relevant materials publicized.</p>	
<p><b>what ways could this function have a positive impact on any of the groups above? How will this function be used to eliminate discrimination, advance equality of opportunity and foster good relations between different groups? Are there plans for the future which will further advance equality?</b></p> <p>Application of this policy will foster good relations by enhancing the positive culture and celebration of diversity within the College and eliminating discrimination by clarifying the nature of and opposition to hatespeech. All will benefit by clarification of Freedom of Expression.</p>	
<p>4. <b>What evidence supports your judgment e.g. consultations, observations, expert opinions, quantitative or</b></p>	
<p><b>qualitative surveys? If the evidence is in the form of an additional document, where is it stored?</b></p> <p>This policy is derived from Guidance provided by the Equality and Human Rights Commission on The Legal Framework for Freedom of Expression. <a href="http://www.equalityhumanrights.com/publication/freedom-expression-legal-framework">http://www.equalityhumanrights.com/publication/freedom-expression-legal-framework</a></p>	
<p>5. <b>Name and job title of manager responsible:</b>  <b>John Dalton: Co-Principal</b></p>	

## Appendix 1 – Elections and Referendums

It is important to state at the outset that there is a particularly high level of legal protection for freedom of expression during election periods. Any interference with this right must be exceptional and subject to the strict limitations set out in human rights law.

The law permits people to say things that offend others during election periods and at other times. It is entirely proper that there should be vigorous debates about controversial matters, and this is particularly important during elections periods.

However, it is also important to note that the right to freedom of expression does not justify incitement to racial or religious violence or hatred, or other unlawful conduct. The right to freedom of expression cannot be at the expense of the rights and freedoms of others. *Equality*  
*and Human Rights Law during an Election Period – Equality and Human Rights Commission.*

Free elections and freedom of expression, particularly freedom of political debate, together form the bedrock of any democratic system... The two rights are interrelated and operate to reinforce each other... For this reason it is particularly important in the period preceding an election that opinions and information of all kinds are permitted to circulate freely. *Bowman v UK* (1998) the European Court of Human Rights.

- A. David Game College has a duty to promote Fundamental British Values such as democracy as identified in section 3.6 above.
- B. The College will make every effort to invite official candidates for the College's Local Government Ward, Parliamentary Constituency or European Parliamentary Constituency to participate in events. This invitation will not be extended to political parties who are not represented in the relevant election.
- C. The College is conscious of the potential for leafleting from Political Parties, pressure groups or individuals to cause litter and other problems and so will present copies of literature from official candidates in a controlled central display, to help inform its own mock elections and participation in the local, national or other. Any materials brought into College and left around or fly-posted will be removed. Political leaflets may be used as teaching resources. In this case the suitability will be left to the professional judgement of the member of staff concerned. They should also vet the suitability of any student generated materials for display.
- D. In the case of national or local referendums, the College will facilitate debates between representatives of the opposing views in the referendum and will display official literature on the referendum question, as well as providing this to tutors and lecturers to use as appropriate in their teaching.
- E. Any questions about the suitability of printed material for the College setting should be addressed to the Prevent Committee.

**Ends**

**TBR 2023**