



Policy Title	Prevent Policy			
Course type	HE	x	Practical	
School	London	x	Online	x
Approved by	Quality and Standards Committee			
Owner	Head of Quality			
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Document Revision History

Version Log

Committee / Approval Date	Author	Version	Publication Date	Page Reference & Summary
Quality and Standards Committee 13.02.24	Head of Quality	1.4	05.03.24	Page 5 Updated to include references to Higher Education (Freedom of Speech) Act 2023.

Related Documentation

Document Reference No. (Policy version / Supporting doc. #)	Document Type	Link or Dept. Owner	Document Title

1. Policy

- 1.1. Point Blank is required under the Counter-Terrorism and Security Act 2015 to 'have due regard to the need to prevent people from being drawn into terrorism'. Under section 29, it must have regard to guidance issued by the Home Secretary and the Department for Education. The Prevent Duty Guidance for higher education institutions in England and Wales came into effect on 18 September 2015 following approval by Parliament. Some of the ways in which we meet these responsibilities are set out in this document.

2. Scope of the Procedure

- 2.1. The Prevent Policy applies to all staff and (where relevant) students of Point Blank.
- 2.2. All persons (whether academic staff or otherwise) whose normal place of work is on premises of Point Blank
- 2.3. All registered students at Point Blank London and Point Blank Online (whether full-time or part-time)
- 2.4. This Policy applies for the following meetings and events:
 - a) Meetings and events within Point Blank which are arranged by staff or students but outside normal academic activity and which involve an external speaker not associated with Point Blank
 - b) This Policy does not normally apply to activities directly linked with the academic work of Point Blank. However, it may be invoked if Point Blank becomes aware that an event is likely to lead to a contravention of our Prevent Duty, which is to prevent people being drawn into terrorism.
- 2.5. This Prevent Policy also covers the expected procedures by which staff should follow to raise a Prevent Duty concern.

3. Roles and Responsibilities

- 3.1. All members of staff should be aware of Point Blank's responsibilities under the Prevent Duty and of the measures set out to comply with it. Members of the academic or support staff who are concerned about a student who might be at risk of being drawn into terrorism should report this to the Head of Music School and Facilities in their responsibilities under this Policy.
- 3.2. The Head of Music School and Facilities will take a written account of the concerns and raise this with the Prevent Lead, the Head of Quality. Following discussion, the next course of action will be decided, this includes raising the concern through the Channel Process.

4. Approach

- 4.1. Point Blank welcomes the Government's intention that the Prevent Duty is implemented 'in a proportionate and risk-based way' and that it should not create large new burdens on institutions. We therefore intend to implement our legal responsibilities as part of our existing policies and procedures, which we also consider to be the best way of ensuring a joined-up approach.
- 4.2. Point Blank has a duty of care towards its students and is committed to providing an environment that promotes opportunities to learn and develop as individuals. We take seriously our responsibility to ensure the safety and wellbeing of students, staff and the wider community and as part of this wish to do all that we can to prevent any member of the college community from being drawn into terrorism. We also have a responsibility to protect academic freedom and general freedom of expression.
- 4.3. Information about Prevent, and staff and student's responsibilities and process to follow, is disseminated on the VLE. This information has made use of the Safe Campus Communities modules developed by the Leadership Foundation.

5. Leadership

- 5.1. Point Blank takes seriously the need to prevent terrorism occurring in our community. Our approach has been approved by the Board of Directors who assume the responsibilities of the governing body.
- 5.2. The Head of Quality has been identified as the member of management responsible for ensuring that Point Blank complies appropriately with the Prevent Duty, in liaison with the BIS regional Prevent Coordinator and other key stakeholders within and beyond the University. An annual report will be made to the Board of Governors in order that the Board can discharge its responsibilities under legislation and OfS requirements.

6. Pastoral Care

- 6.1. Point Blank is responsible for the welfare of all of its students. Pastoral care is a key way of safeguarding student welfare, particularly those who may be vulnerable to being drawn into terrorism. Pastoral care is delivered through Academic instructors, Point Blank assistants and the Head of Music School and Facilities. Training will be provided for all staff involved directly in student welfare, so that such staff are aware of their duties under Prevent, and understand the processes by which they can support vulnerable students.
- 6.2. All staff and students should be aware that, should they have concerns regarding the wellbeing of a student, they can raise these in confidence with the Head of Music School and Facilities.

7. Risk Assessment and Action Plan

- 7.1. As required by the Prevent Duty and HEFCE reporting requirements, we have carried out an assessment of the risk of our students being drawn into terrorism. The risk assessment has been approved by the Board and was discussed at the Executive Committee.

8. External Speakers

- 8.1. The Policy and Procedure on Freedom of Speech sets out how we will ensure that we meet the different legal requirements on us, not least the duty under the Education (No. 2) Act 1986 to secure freedom of speech within the law. Under the Policy, where the views expressed constitute views that risk drawing people into terrorism, or are shared by terrorist groups, permission must be sought by the staff or student organiser from the University Secretary, who will consult as appropriate and will seek a decision from the Senior Management Team (SMT) if necessary.
- 8.2. Due diligence is carried out where required and we will share information with the institutions if appropriate about any event that comes within the remit of Prevent.
- 8.3. In complying with the Prevent Duty the University will not:
 - a) Provide a platform for any proscribed terrorist organisation or permit the encouragement of terrorism in any way;
 - b) Allow gender segregation at any event it organises or at events held on its premises.

9. Staff Training

- 9.1. We will provide awareness training on a regular basis for all relevant staff, tailored to need. The instructor handbook on the VLE has been updated with information and training resources about Prevent, including links to the Safe Campus Communities modules.

10. IT Networks

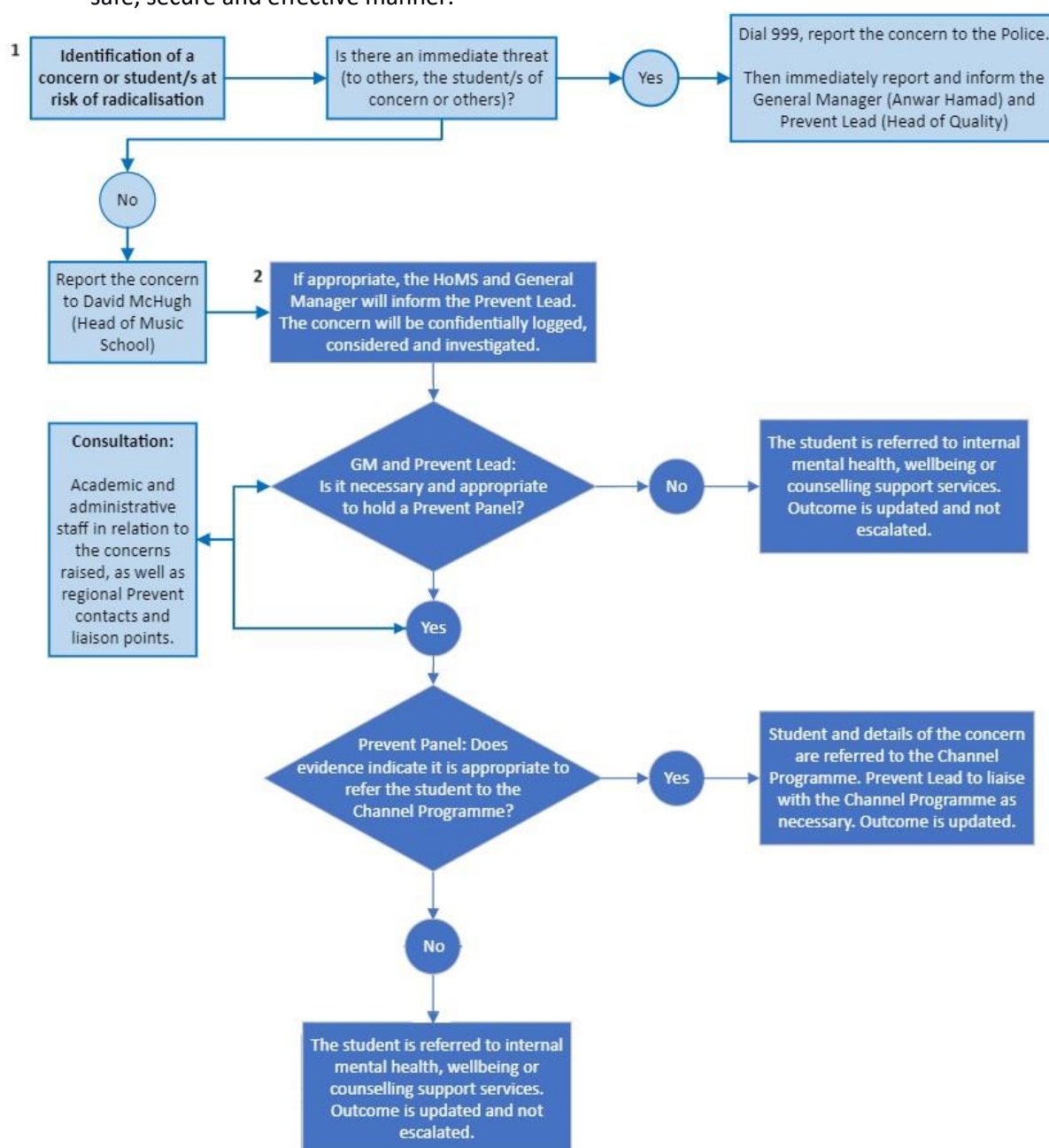
- 10.1. We consider it unacceptable for our IT networks to be used in any way that supports, promotes or facilitates terrorism. Relevant IT policies and procedures will be kept under review with reference to Prevent and staff training will be required for any staff members within the IT and Web Development Team that . Point Blank will also keep the use of social media under review.

11. Communications

- 11.1. We will not permit material supporting terrorism to be displayed within Point Blank premises and will remove any such material if it is found. Likewise, we will seek to ensure that Point Blank's printed and electronic communications (including its website) do not contain or support terrorist material or material likely to encourage terrorism and will investigate immediately if any such instances are raised.

12. Procedure for Raising a Concern and Information Sharing

- 12.1. Point Blank is aware of the Channel process and of the opportunities for informal and formal sharing of information with relevant authorities. We will use these when we consider it is necessary and appropriate to do so in the interests of preventing people from being drawn into terrorism. Information sharing will only take place with external authorities when this is consistent with the provisions of the Data Protection Act.
- 12.2. Below is the process for raising a concern. The designated Prevent Lead Coordinator is responsible for the operational coordination of any administration or support for the process. This may include staff/external guest support and general advisement, or coordination of student support in relation to the case. The welfare and safety of both students and staff is imperative, to enable the concern to be addressed and raised in a safe, secure and effective manner.



- 12.3. In the first instance, **1 Identification of a concern** as above, the identifying staff member may directly consult the Prevent Lead for advice. If the concern is identified as not relevant to Prevent Duty, the staff member will be advised by the Prevent Lead and Head of Music School on the relevant internal or external support services and directed to other appropriate internal policies.
- 12.4. If the Prevent Panel agree that the concern is legitimate but it is **not appropriate** to refer the person to the Channel Programme, then the Panel will agree on relevant internal welfare actions and support services to support the individual/s. This may include referral to the School counsellors, an external support service and/or staff may refer to relevant academic policies including
- 12.5. All Heads of Departments and the General Manager will maintain relevant staff training on the circumstances by which to raise a concern or direct the person in concern to the appropriate support services/staff members.
- 12.6. All relevant staff involved on the Prevent Panel should give due regard to the School's Academic Freedom Policy, Data Protection Act, GDPR and Prevent Duty requirements when sharing information in relation to this policy.