GBS Safeguarding (Prevent Duty) Policy

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Related policies
▪ GBS Data Protection Policy
▪ GBS Equality and Diversity Policy
▪ GBS Freedom of Speech Policy
▪ GBS Anti-Harassment and Anti-Bullying Policy
▪ GBS Student Disciplinary Policy and Procedure
▪ GBS Staff Disciplinary Policy
▪ GBS Email Usage Policy
▪ GBS CCTV Policy and Procedure
▪ GBS Social Media Policy
▪ GBS Whistleblowing Policy
▪ GBS ICT Policy
▪ GBS IT Security Policy
▪ GBS Student Charter
▪ GBS Student Code of Conduct
External Reference
1. Information Commissioner's Office, Accessed online at: https://ico.org.uk/
2. UK Public General Acts, *Data Protection Act 2018*, Accessed online at: https://www.legislation.gov.uk/ukpga/2018/12/contents/enacted
3. UK Public General Acts, *Computer Misuse Act 1990*, Accessed online at: https://www.legislation.gov.uk/ukpga/1990/18/contents
4. UK Public General Acts, *Terrorism Act 2000*, Accessed online at: https://www.legislation.gov.uk/ukpga/2000/11/contents
5. UK Public General Acts, *Counter-Terrorism and Security Act 2015*, Accessed online at: https://www.legislation.gov.uk/ukpga/2015/6/section/26
6. GOV.UK Statutory Guidance, *Prevent duty guidance*, Accessed online at: https://www.gov.uk/government/publications/prevent-duty-guidance

7. UK Public General Acts, *The Telecommunications (Lawful Business Practice) (Interception of Communications) Regulations 2000*, Accessed online at: https://www.legislation.gov.uk/uksi/2000/2699/contents/made

Contents

Global Banking School Safeguarding (Prevent Duty) Policy

1. **Policy Statement**

   1.1. Global Banking School (GBS) recognises the importance of safeguarding and prevent duty and therefore this policy is designed to provide a clear framework to structure and inform GBS response to safeguarding concerns for students and staff who may be vulnerable to any form of abuse including messages of extremism. GBS promotes a multicultural environment where respect for, and tolerance of, other people's beliefs is required at all times. GBS aims to provide a safe, inclusive environment, conducive to work, learning, scholarly activity, and the enjoyment of a positive experience to all at GBS.

   1.2. This policy outlines GBS commitment to preventing staff and students from being drawn into terrorism. In doing so we recognise that terrorism can be associated with a range of ideologies. This policy seeks to safeguard students and staff from violent extremism in the name of ideology, or belief, whilst at the same time protecting freedom of speech and embedding a commitment to the promotion of positive learning and community relations.

2. **Purpose**

   2.1 The GBS Safeguarding (Prevent Duty) Policy provides for the three key areas of prevention, protection, and support for both students, staff and others associated with GBS across all its campus locations. Our core principles are to:

   – Ensure vulnerable individuals are safeguarded and from being drawn into terrorism or related activities.

   – Identify, protect, and support individuals who it believes may be at risk of abuse of any kind and/or being drawn into terrorism, where such actions do not infringe an individual's privacy and Data Protection legislation.

   – Discharge responsibility in partnership with other agencies, including the Police, Local Authorities, and the network of regional Prevent Co-ordinators.

   2.2 This policy emphasises the importance for staff, students, visitors, or any individual to:

   – Foster a culture of trust between adults who work at GBS and those who attend it

   – Prevent people who pose a risk of harm from working with 'at risk' adults

   – Ensure staff receive appropriate safeguarding training which is regularly updated

   – Ensure staff are effective in providing 'early help'

2.3 Staff should be aware of and be able to effectively respond to a range of issues. The list given below is not intended to be exhaustive but is indicative of the types of issues might lead a person to be deemed as 'vulnerable':

- Honor-based violence
- Peer to peer bullying and self-harm
- Mental health issues
- Online risks
- Physical abuse, which includes hitting, slapping, pushing, kicking, rough handling or any other unnecessary or unwarranted physical force
- Sexual abuse
- Psychological abuse, which includes emotional abuse, threats of harm, deprivation of contact, humiliation, blaming, controlling, intimidation, coercion, harassment, and verbal abuse
- Financial or Material abuse which includes exploitation, misuse or misappropriation of property, theft, and fraud
- Discriminatory abuse, which includes racist, sexist and abuse based on disability.

3. Legislation

3.1 This policy is written with reference to the Counter-Terrorism and Security Act 2015, and to the formal guidance issued from the UK Home Office related to the Prevent Duty, September 2015 (referred to as the 'formal guidance' throughout this policy). The Act places a duty on higher education institutions to have 'due regard to the need to prevent people from being drawn into terrorism.' The Act also notes that higher education institutions must seek to balance this duty with their commitment to freedom of speech and the importance of academic freedom.

3.2 **Equality and Diversity**

3.2.1 The Equality Act 2010 provides protection against discrimination, harassment, and victimisation on the grounds of disability and other protected characteristics. It is a legal duty for higher education institutions to anticipate needs and make reasonable adjustments so that disabled students are not placed at a substantial disadvantage compared to students who are not disabled.

4. Scope

4.1 This policy applies to:

- All full-time, part-time, and temporary staff employed by, or working for or on behalf of GBS

- All students studying at GBS

- Contractors and consultants working for GBS

- All other individuals or groups, including visitors, who have been granted access to GBS ICT facilities.

4.2 This policy applies to children and young people aged under 18 years.[1] Adults at risk (defined by Section 42 of the Care Act 2014), and any persons who may be at risk of radicalised by any extremist group or ideology under the terms of the Counter Terrorism and Security Act 2015, Section 26(1) and as defined in the Prevent Duty guidance, 2015.

4.3 Every individual defined within the scope of this document is responsible for the implementation of this policy.

5. Key Definitions

5.1 *Prevent* is the anti-radicalisation agenda embedded in the Counter Terrorism Act and called Prevent in this policy.

5.2 *Extremism* is defined 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. As well as calls for the death of members of UK armed forces, whether in this country or overseas.

5.3 *Non-Violent Extremism* is extremism, as defined above, which is not accompanied by violence.

5.4 *Radicalisation* is the process by which a person comes to support terrorism and extremist ideologies associated with terrorist groups.

5.5 *Terrorism* is an action that endangers or causes serious violence to a person/people; causes serious damage to property; or seriously interferes or disrupts an electronic system. The use or threat must be designed to influence the government or to intimidate the public and is made for the purpose of advancing a political, religious, or ideological cause.

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[1] *GBS students are typically mature and over the age of 25 years. GBS does not anticipate having students who are under 18 years of age, nevertheless, should GBS admit students under the age of 18 years the GBS Safeguarding Policy and associated procedures would apply.*

5.6 *Vulnerability* is a situation where a person is at risk of exploitation, harm, or abuse. A person may join GBS already vulnerable, or can become vulnerable because of specific circumstances, which may increase the risk of them experiencing exploitation, harm or abuse or being radicalised.

6. Responsibilities

6.1 Responsibility for ensuring Prevent Duty lies with GBS Chief Executive Officer.

6.2 Responsibility for the Safeguarding (Prevent Duty) Policy, prevent risk assessment and action plan lies with GBS Managing Director supported by the Campus Coordinators. Their duties are to ensure delivery of an effective risk assessment/ action plan and up to date policy that fully comply with and meet the Prevent requirements. They are also responsible for annual Prevent returns and liaison with the Department for Education Regional Prevent Coordinator and liaison with the Office for Students, as appropriate.

6.3 It is the responsibility of all GBS staff to be aware of the GBS Safeguarding (Prevent Duty) Policy and associated documents. Staff will be provided with training and regular briefings. All staff should be familiar with GBS procedures and protocols for safeguarding the welfare of students and young people. Staff have a duty to report any student protection or welfare concerns to their designated Campus Prevent and Safeguarding Officer.

7. Risks Assessment and Action Plan

7.1 GBS will undertake a risk assessment to identify potential risks associated with students being drawn into extremism or terrorism, based on the risk assessment and any identified concerns, an appropriate action plan will be developed to identify risks and identify what actions need to be taken to mitigate. The risk assessment and associated action plan will be updated on an annual basis. This will be considered and approved by Academic Board and considered by Executive Board.

8. Working with Partners and Information Sharing

8.1 GBS will make and maintain contact with the Local Police and Local Authority Prevent Coordinator appropriate for all our campuses to understand their roles and the support available. Regular contact with local authorities will help GBS to ascertain other useful local agencies to work with. GBS will share information with local organisations, as appropriate. GBS may also share specific information about an individual or a group of individuals engaged in any actual or suspected unlawful activity. In reaching a decision to

share information with third parties, GBS will adhere to our Data Protection Policy and take any decision in the context of our Freedom of Speech Policy.

9. Training and Referral Procedure

9.1 The key members of staff will be given training or workshops to ensure staff understand this GBS Safeguarding (Prevent Duty) Policy, prevent duty requirements and associated procedures. Training and workshops for GBS staff will involve:

- The context and expectations of Safeguarding and the Prevent Duty
- The duties and responsibilities of GBS, its staff and students
- Referral procedures for suspected cases of abuse and/or extremist behaviour
- Definitions of terminology and how to identify vulnerable individuals and risks of extremism and terrorism
- Understanding the importance of their own behaviour and professionalism and not discussing inflammatory subjects with students within the context of GBS Freedom of Speech Policy.
- Ensuring Student Representatives and the wider student body are fully aware of this policy associated procedures. This will include:
  - o understanding terminology
  - o importance of maintaining a supportive, respectful, and tolerant culture in GBS
  - o requirements for students to report any concerns and/or incidents.

9.2 Staff at GBS must complete the certificated Prevent training module prior to commencing their employment. This takes about one hour to complete and can be found at https://www.foundationonline.org.uk/course/index.php?categoryid=14. Professional staff and academic staff are all required to complete this training module.

9.3 If any member of staff or student is concerned about another staff member or student or group of students, they must contact the appropriate Student Success Tutor. Concerns about staff or students will be referred to the Chief Executive Officer and GBS Lead Safeguarding and Prevent Officer.

10. Signs that may cause concern

10.1 The following provide some guidance to behaviours, language, events, and material that may cause concern regarding terrorism and extremism:

- Students talking about exposure to extremist materials or views outside GBS (in this event, information must be shared with relevant local authorities)

- Changes in behaviour, for example, someone becoming isolated

- Fall in standard of work, poor attendance, disengagement from studies

- Changes in attitude, for example, to intolerance of differences and/or having closed mind about matters such as beliefs or ideology

- Asking questions about topics connected to extremism or terrorism

- Offering opinions that appear to have come from extremist ideologies

- Attempts to forcefully impose own views/beliefs on others

- Use of extremist vocabulary to exclude others or incite violence

- Accessing extremist material online, via social network sites, etc.

- Overt new religious practices

- Drawings or posters showing extremist ideology/views/ symbol

- Voicing concerns about anyone.

- Any concerns relating to a person under the age of 18 are safeguarding issues and should be dealt with in accordance with this policy.

11. Counteracting Risk

11.1 The following provide some guidance to how risks of extremism and/or terrorism may be counteracted at GBS:

- Promoting a safe and supportive learning environment through providing clear expectations of accepted behaviours and those, including radicalisation and extremism, that will not be tolerated.

- Promoting core British values through information given to students, notices displayed around all our campuses, examples set to students by staff, and in classes and discussions that include education about British culture, traditions, beliefs, and tolerance.

- Where appropriate, developing critical awareness and thought to counter accepting extremism without question, especially of online material.

- Challenging radical or extremist views in any context, formal or informal, following stated procedures and reporting duties.

- Being ready to react when local, national, or international events cause upset; being aware of the likelihood of conflicting feelings being expressed, and alert to potential acts of recrimination.

- Having strong filters on GBS internet and IT equipment together with clear rules on accessing extremist websites, as well as the use of social networks to exchange extremist views.
- Ensure that extremist speakers do not use GBS premises to distribute material or expound views.
- Getting to know our students and guests, their home circumstances and friendship groups. Through knowing students well, it is easier to spot changes in behaviour.
- Being observant and vigilant in noticing any signs of radical or extremist behaviour
- Working hard to support any students identified as vulnerable and at risk and reporting.

12. Guidance for safer working practices

12.1 All adults who work with students and young people have a crucial role to play in shaping their lives. They have a unique opportunity to interact with students and young people in ways that are both affirming and inspiring. This guidance has been produced to help staff establish safe and responsive environments which safeguard young people and reduce the risk of adults being unjustly accused of improper or unprofessional conduct. This means avoiding any conduct which would lead to any reasonable person to question the motivation and intentions.

12.2 Staff should remember that their behaviour has a significant impact on the students, and they must therefore adopt a professional approach to all aspects of their work; this includes dress, communication, and social contact. If in doubt, staff should discuss any uncertainties or confusion with their line manager. Similarly, if staff feel that an incident could be misinterpreted, they should document it and report immediately to a senior member of staff.

13. The use of Internet and IT facilities

13.1 When using GBS IT services, equipment, and internet, all members of staff, students and guests are required to adhere to GBS ICT Policy. It is forbidden to use GBS website, internet, IT facilities, or other elements of the information management systems or processes for material that is illegal or offensive, and the instigation, promotion or planning or execution of violent or non-violent extremism, radicalisation, or terrorism in the name of ideology or belief.

13.2 GBS reserves the right to remove students or members of staff from our IT platforms or premises if they are found to be involved in any illegal and/or offensive material and/or material encouraging engagement with violent or nonviolent extremism, radicalisation, or terrorism related activities.

14. Access and Control

14.1 GBS students, staff and visitors must follow the below access and control measures and ensure that:

- Events hosted by students may be permitted provided they do not break the law or breach the lawful rights of others e.g., using threatening, abusive, or insulting words or behaviour, particularly with a view to incite hatred or draw others into terrorism. Any student society, group of students or individual student wishing to host such an event must first contact GBS Safeguarding and Prevent Lead.

- If a member of staff and/or student (or group of students) wishes to invite an external speaker onto GBS premises, at any of its campuses, they should complete the External Speaker Approval Form and obtain approval from the Campus Prevent Lead. In doing so, at least 14 days advance notice of the planned event must be given.

- External bookings for GBS to host conferences, hospitality and academic speakers will be treated in the same way, thus ensuring that the GBS always knows who is on campus and why.

- Any contentious or security issues that might affect the safety of staff or students or the reputational integrity of the GBS must be referred to the GBS Safeguarding and Prevent Officer Lead for the campus.

15. Monitoring and Review

15.1 This policy may be amended by GBS at any time and will be reviewed annually to ensure it is fit for purpose. Any issues related to the monitoring and review of this policy, please contact asqo@globalbanking.ac.uk.

16. Data Protection and Confidentiality

16.1 GBS is registered with the Information Commissioner's Office as a Data Controller. Details of the School's registration are published on the <u>Information Commissioners website.</u> GBS as a Data Controller shall implement appropriate technical and organisational measures to ensure that processing of personal information is performed in accordance with the UK General Data Protection Regulations (UK GDPR) and under the Data Protection Act 2018 (DPA).

16.2 The UK GDPR and DPA regulates the use and storage of personal information (i.e., any information which identifies a living individual) on computing systems. It is the user's responsibility to ensure that their information and computer usage complies with this law. Failure to do so could result in criminal charges being brought against both you and GBS.

16.3 GBS recognises that all matters relating to safeguarding will only be shared with individuals who need to be made aware of the situation to appropriately discharge GBS' responsibilities and duty of care. All GBS staff must be aware that they have a responsibility to immediately disclose information which, if not shared, may compromise a student's safety or welfare. All GBS staff will be fully supported by the GBS Prevent/Safeguarding Officer.

17. Alternative Format

17.1 This policy can be provided in alternative formats (including large print, audio and electronic) upon request. For further information, or to make a request, please contact:

- **Name:** Welfare Management Team
- **Position:** Welfare Officer/Manager
- **Email:** <u>welfare@globalbanking.ac.uk</u>

Annex 1- Understanding Key Definitions

The glossary of terms has been sourced from the Prevent Strategy 2011
https://www.gov.uk/government/uploads/system/uploads/attachment_data/file/97976/prevent-strategy-review.pdf

- Extremism is 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, whether in this country or overseas.

- Radicalisation refers to the process by which a person comes to support terrorism and forms of extremism leading to terrorism.

- Vulnerability describes the condition of being capable of being injured; difficult to defend; open to moral or ideological attack. Within Prevent, the word describes factors and characteristics associated with being susceptible to radicalisation

- An ideology is a set of beliefs. An ideologue is a proponent as well as an adherent of an ideology

The current UK definition of 'terrorism' is given in the Terrorism Act 2000 (TACT 2000). In summary this defines terrorism as an action that endangers or causes serious violence to a person/people; causes serious damage to property; or seriously interferes or disrupts an electronic system. The use or threat must be designed to influence the government or to intimidate the public and is made for the purpose of advancing a political, religious, or ideological cause (the definition has been sourced from the Revised Prevent Duty Guidance: for England and Wales https://www.gov.uk/government/publications/prevent-duty-guidance).

- The Office for Students, alongside and in conjunction with other agencies, produces a significant amount of guidance and research to support the Prevent initiative and to offer support to the UK Higher Education sector.

- A framework for how OfS gather evidence of compliance can be found at: https://www.officeforstudents.org.uk/publications/prevent-%20duty-framework-for-monitoring-in-higher-education-in-england-2018-19-onwards/

- The DfE FE/HE Regional Prevent Coordinators for London are:
  Chris Rowell chris.rowell@education.gov.uk
  Jake Butterworth jake.butterworth@education.gov.uk
  Local Police Counter Terrorism Officers are:
  Bhimji.Vekaria@met.pnn.police.uk
  Ella.freer@met.ppn.police.uk

- The Safe Campus Communities Website offers a range of materials explaining the Prevent strategy and its intended impact, with a set of case studies, and specific guidance on building and implementing an effective in-house response. There is also a training programme including accessible e-learning options. It is available at: http://www.safecampuscommunities.ac.uk/training

- This has been put together by OfS, BIS, the Leadership Foundation for HE, and Universities UK. The Home Office has also launched an e-training portfolio for the education sector available at: https://www.elearning.prevent.homeoffice.gov.uk/

- A Prevent training catalogue, detailing available courses for staff involved in implementing an in-house strategy. This can be accessed at: https://www.gov.uk/government/uploads/system/uploads/attachment_data/file/503973/Prevent_Training_catalogue_-%20_March_2016.pdf