



PREVENT DUTY STRATEGY

Introduction

The Prevent duty 'monitoring framework is operated by HEFCE and is intended to satisfy Government that 'relevant higher education bodies' [RHEBs] are fulfilling their duty under the Counter-Terrorism and Security Act 2015 (the Act) to have due regard to the need to prevent people being drawn into terrorism (the Prevent duty).'

Mattersey Hall (Assemblies of God Inc.) is an alternative provider of higher education, with specific course designation and therefore we are a 'relevant higher education body' (RHEB). This policy document sets out our response to Government requirements and to the Prevent duty monitoring framework.

More information is available in:

Revised Prevent Duty Guidance, which can be found at https://www.gov.uk/government/uploads/system/uploads/attachment_data/file/445977/3799_Revised_Prevent_Duty_Guidance_England_Wales_V2-Interactive.pdf, and

The Prevent Duty: Monitoring Framework for the Higher Education Sector, which can be found at: http://www.hefce.ac.uk/media/HEFCE,2014/Contenthttp://www.hefce.ac.uk/media/HEFCE,2014/Content/Pubs/2015/201532/HEFCE_2015_32.pdf/Pubs/2015/201532/HEFCE_2015_32.pdf.

Academic integrity and freedom of academic expression

Mattersey Hall seeks to offer an integrated programme, where leadership formation and academic study go hand in hand. Many of the training and formation elements form part of Mattersey Hall's internal College Diploma, which all on-campus students sign up to, and which runs parallel to the degree programme. Those appointed to the staff of Mattersey Hall, or admitted to the College as students, are expected to accept the values and vision of the College.

One aspect of this is a commitment to academic excellence and integrity, which includes a commitment to the freedom of academic expression. In the course of their research, students and staff are encouraged to explore, critically, a range of viewpoints, and to come to their own conclusions. Whilst the College, as part of Assemblies of God Incorporated, holds a particular doctrinal position, this does not impose limits on the research into and expression of academically viable alternatives. Any concerns of discrimination in this area will be reported, initially, to the Academic Dean, and this will be followed up, at first informally, and where necessary through appropriate complaints and appeals procedures. However, where views expressed might be considered 'extremist', defined in the *Prevent* document as 'vocal or active opposition to fundamental British values, including democracy, the rule of law, individual liberty, mutual respect, and tolerance of different faiths and beliefs', or suggest that a student or staff member is being

radicalised or drawn into a context that might lead to terrorism, that will be reported to the Academic Dean, Vice-Principal and Principal and will be dealt with under our normal disciplinary and misconduct procedures.

Appropriate conduct

A second important aspect of accepting the vision and values of the College is a commitment to the standard of conduct (which includes speech and action) consistent with formation for Christian ministry. Expectations relating to general behaviour are set out in AoG Policies and in the Mattersey Hall College Handbook. The College Handbook is available to all students which is revised each year, in consultation with students, and forms the basis of any internal disciplinary action. These expectations apply to personal as well as to community activities and are consistent with what is set out in the Prevent Duty monitoring framework. They include attitudes of mutual respect and tolerance of cultural differences. Whilst set within a particular religious and denominational context, we also promote respect for those of other denominations, and those of different faith groups, and none. Our Misconduct Procedure (non-academic misconduct) further highlights expectations of student behaviour toward others. Behaviour that runs contrary to those expectations is addressed by the College Principal (staff and faculty) and the Vice-Principal (students), again, under our normal disciplinary and misconduct procedures.

Managing risk

In the light of the nature of the college and its values we consider the risk of staff or students becoming radicalised or seeking to radicalise others is very small. Nevertheless, we recognise our responsibility in this area, and want to guard against complacency.

After carefully considering all areas of College activity in which students might come under the influence of extremist views (as defined in the Prevent documentation), we have identified the following areas of potential, albeit minimal, risk.

- i) Student or staff engagement with radical elements off campus, leading to extremist views and conduct that affect students on campus.
- ii) Student-led activities on and off campus that might provide a platform for extremist views.
- iii) Inappropriate counselling by staff or students that results in undue influence.
- iv) Extremist views expressed by visiting lecturers and/or occasional speakers.
- v) Misuse of internet facilities.
- vi) Lack of awareness of potential problems and responsibility under the Prevent Duty that may allow adverse situations to develop.

The following procedures are in place to minimise, further, any potential risk.

i) Student, staff radicalisation

- a) Students and staff come to us, in the first instance, with appropriate verifiable pastoral references. Where there are concerns, we will put in place monitoring procedures. These include mentoring and other pastoral support from staff and students and, where necessary, application of misconduct procedures. Students are also required to undergo DBS checks prior to beginning their programme of study at Mattersey Hall.
- b) We recognise the possibility of students engaging with radical elements off campus and then seeking to influence students on campus with extremist views. Mattersey Hall is a small,

close-knit community, with a strong pastoral support network. This includes a mentoring policy, the support of the pastoral team and of Lead Students, who work with faculty and staff to offer additional support to the student body, support from the academic team, as well as informal conversations. There may also be local church support. This allows changes in attitudes and behaviour, as well as the expression of extreme views to be picked up quickly, and dealt with sensitively. To facilitate this, faculty, staff and students will be made aware of what to look for in terms of changed attitudes and behaviour that might indicate radicalisation (see vi below).

ii) Student-led activities

- a) Most student-led activities take place on campus. These are advertised in advance, and invitations are usually extended to faculty and staff. There is no formal monitoring of these activities, and in general we have confidence in students to conduct themselves appropriately. However, the close-knit nature of college life and the wide involvement of Lead Students ensure that there is informal monitoring by peers, and that anything untoward is noted and, where necessary, reported to senior management of the College for appropriate action.
- b) Off campus activities that take place under the auspices of Mattersey Hall, including Missions Trips, Ministry Placements, Church visits, are generally led or facilitated by staff or faculty members, and include preparatory meetings and guidance. Again, there is informal monitoring by peers, and where students seem to be unduly influenced by extremist views this will be reported and appropriate action taken.
- c) In the unlikely situation where there is concern about an on or off campus activity or event relating to the Prevent duty, a risk assessment will be made to determine whether the activity or event should take place.

iii) Inappropriate counselling

- a) As noted, the College has a strong network for pastoral support. This, though, can be open to abuse by those who seek to take advantage of those who may appear more vulnerable. This risk is minimised in the following ways.
- b) We are careful in the selection of those who are officially given responsibility for counselling and advice, including the pastoral and academic teams, mentors and Lead Students. And all are made aware of the Prevent Duty (see vi below). Where there is evidence of guidance that would conflict with that duty, whether from staff or students, that will be dealt with through our misconduct procedures.
- c) Overlapping official channels of pastoral support, together with informal contact with students by faculty and staff, generally alert us to influence on students that might conflict with our Prevent duty, including influence by peers. Where noted that will be dealt with through pastoral support and, where necessary, misconduct procedures.

iv) Extremist views expressed by visitors

- a) Visiting lecturers are expected, and contractually obliged, to accept and promote the values of the College, including those that relate to the College's Prevent Duty. Visiting lecturers are usually known to members of faculty or staff, and are, in any case, required to provide references. There is regular, formal, monitoring of all teaching faculty, as well as formal and informal feedback from students. We recognise the importance of maintaining academic integrity (see above). However, where we become aware that speech conflicts with our responsibility under the Prevent duty, the College management will take action under our misconduct procedures. Any students who might be unduly influenced will be offered pastoral support.
- b) Occasional visitors who are invited to speak at College events are expected to accept and promote the values of the College, including those that relate to the College's Prevent duty, but have no contractual obligation. Visiting speakers are invited, usually by the Principal or Vice Principal, because they are well-respected in church leadership circles and can have a positive impact on students who are training for Christian Leadership, or as representatives of bona fide groups or organisations, which are known not to hold extremist views, as defined by the Prevent guidance. All visiting speakers attending the institution must be approved by the Strategic Management Team. Where appropriate we will carry out appropriate background checks. Speakers will also be informed, in advance, of the College's responsibility under the Prevent duty.
- c) In most cases faculty and staff are present for addresses by visiting speakers. Where speakers are involved in teaching students, there is informal feedback as noted above. If there is any prior concern about the possible content of lectures, a member of faculty or staff will audit the lecture, and provide feedback to College management.
- d) Where a visiting speaker does express extremist views (as defined by the Prevent document) he or she will be in breach of the conditions of the speaking engagement, and will not be allowed to continue with the address on that occasion. Where appropriate, in line with Government guidelines, a debate where both sides of the argument are represented may be scheduled.
- e) Any apparent undue influence on students will be dealt with through our pastoral procedures.

v) Misuse of the internet

- a) Students are expected to provide their own computers and we do not have a policy of making college computers available to students, unless in exceptional circumstances.
- b) Internet facilities made available to students are subject to the Internet Acceptable Use Policy.
- c) The College has facilities to block access to certain categories of website. This prevents unauthorised access except in the most determined cases. Attempts by students to bypass internet restrictions will be dealt with through our misconduct procedures.
- d) Restrictions currently in place block access to several types of website, including *hate/discrimination* and *weapons*. The various categories of site that may be blocked has been reviewed in the light of Prevent, and we will continue to monitor both the categories and the effectiveness of the restrictions in place.

vi) Lack of awareness of Prevent duty

- a) The Academic Dean is, currently, the Prevent Lead Officer. He is familiar with documents relating to Prevent – including the Prevent Duty Guidelines. He has also completed the Prevent E-Learning online programme, and aspects of the Channel awareness programme. There is also access to the 159 Group Prevent Toolkit. This knowledge will be supplemented by further research and attendance at Prevent training workshops.
- b) Details of the Prevent document and our responsibility will, further, be circulated to all staff and faculty members, and we will include detailed discussion of the Prevent duty in staff training sessions. This will include guidance in what to look for in terms of changes in students that may indicate radicalisation. This will form part of our Staff Development plan for the next and future years.
- c) Students will be made aware of our responsibilities as an institution during general induction sessions, and particularly in induction for Student representatives and Lead Students. Information will also be included in the College Handbook. The contents of this Strategy will be discussed, in full, with Student Representatives, and kept under regular review as part of our Enhancement Action Plan.
- d) We intend to engage with Prevent partners, including other similar Colleges, to share information and ideas, and for appropriate personnel to attend relevant training events.

Communicating and escalating concerns

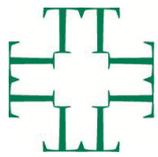
General pastoral support of students is provided by the Pastoral Care team, led by the Vice-Principal. The level of support has been commended by our validating university in successive Partnership Review meetings. The Pastoral Care team is both responsive and proactive. It will respond to individual requests for support by students, and will also follow up concerns raised by staff members and other students. Lead Students, who are appointed by the Faculty, and who meet regularly with the Principal, Vice Principal and other staff members, also offer pastoral support to the wider student body, and, where appropriate, raise pastoral concerns with the Vice Principal. Where concerns raised relate to issues under our Prevent Duty, these will be communicated by the Pastoral Care team to the Prevent Lead.

Alternatively, where students or staff have a particular concern that appears to relate to issues under our Prevent Duty, it may be raised directly with the Prevent Lead.

Once notified of a concern, the Prevent Lead will call a special meeting of the Strategic Leadership Team (SLT), which comprises the Principal, Vice Principal, Academic Dean. The SLT with the Prevent Lead into consider the concerns raised and to determine appropriate action. This will include discussion of how best to address the particular situation. The Prevent Lead will also seek advice from the Prevent Regional Co-ordinator and other Prevent Partners. The SLT, having received appropriate advice, will consider all options, and make a final decision.

We hope to address most issues by offering internal pastoral support, in conjunction with additional support groups, including the student's family and home Church, and Prevent Partners.

Where there is an apparent danger of radicalisation, further advice will be sought from the Prevent Regional Co-ordinator, and where appropriate, the matter will be referred, with the student's content, to Channel. Where there is evidence of illegality, the issue will be referred to the Police.



PREVENT DUTY – Report (January 2017)

Introduction

Mattersey Hall takes very seriously its responsibility under the Prevent Duty, and has put in place a Prevent Duty Strategy, outlining the areas of concern and processes intended to meet those responsibilities. This is accompanied by a combined Risk Assessment and Action Plan, which identifies and rates key risks and indicates action to mitigate the risks, including a time scale for that action. We also revised the Internet Acceptable Use policies for staff and students.

Outstanding Action

Following our submission in June, we were advised that our policies, procedures and arrangements needed improvement. The key areas identified are set out in the table below, together with our responses.

Following the ‘needs improvement’ outcome, we revised the Prevent Duty Strategy, and produced a new Risk Assessment and Action Plan. These were sent to HEFCE for comment on 13 October 2016, and we were advised on 20 October 2016 that someone would get back to us shortly. Since then, we have received no communication. In the absence of any further guidance, we have continued to implement the revised policies and action plan. We trust that this makes good any initial shortfall. The revised documentation is attached.

Problem identified	Response
1. Unsatisfactory Risk Assessment	A revised Risk Assessment has been carried out
a) The Risk Assessment did not rate the risks identified	All risks have been rated using RAG
b) The Action Plan did not sufficiently relate back to the risks identified	The action points are related directly to the risks identified
2. Lack of clarity in processes for raising and referring concerns	This is noted in the Action Plan. Details are set out in the revised Prevent Strategy
3. Lack of clarity regarding staff training	The Risk Assessment/Action Plan sets out a plan for ensuring that relevant bodies are aware of Prevent and have had training.

a) Need to provide further information on training resources	See Risk Assessment/Action Plan. All relevant staff have completed the Prevent E-learning package. Prevent has been discussed at a Staff Training Day, has been the subject of a Staff Training Session in November 2016, and will be the subject of further Staff Training in 2017.
b) Need to indicate when Prevent training will be completed	Initial awareness: October 2016 Further staff training: to be completed by June 2017
4. Lack of active engagement with Prevent partners	Information regarding local Prevent Partners – on file. No reason to make any referrals or seek further advice.
5. Lack of clear policies relating to internet usage.	Risk Assessment/Action Plan. Revised Staff and Student internet acceptable use policies.

Reviewing and Updating the Risk Assessment and Action Plan

The Risk Assessment and Action Plan for the academic year 2016–2017 were revised in September/October 2016 and will be reviewed throughout the year. Some of the action points have already been met – including raising awareness among all front-line personnel, and among the wider student body. There will be further monitoring and review at our Extended Board of Studies in February, 2017, and the Risk Assessment and Action Plan, together with the Internet Acceptable Use policies and the Prevent Duty Strategy will be fully reviewed and revised as necessary for the next academic year at our Extended Board of Studies in June 2017 (as indicated in the Prevent Duty Strategy).

Implementation of the Prevent Duty Strategy

The Prevent Duty Strategy focuses on a number of key, sensitive areas.

- One is maintaining academic integrity and freedom of academic expression, whilst monitoring potential ‘extremist’ views and the access of other potentially sensitive information. Processes for this are in place, and since their implementation, there have been no causes for concern. There have been no concerns, either, from visitors to the campus, including speakers and lecturers.
- Another key area is appropriate conduct by staff and students. Again, processes for monitoring and reporting inappropriate behaviour are in place, and, again, there has been nothing of concern in relation to our Prevent Duty.
- A third area is raising awareness of the Prevent Duty across the Campus.
 - We have raised this as a CPD issue for staff and all front-line staff have worked through the E-learning package. The College’s Prevent Duty was discussed as part of a wider focus on overall strategy, in June 2016, and was the focus of Staff Training in November, 2016. A further Staff Training event is planned before the end of the current academic year.
 - We have also talked about our responsibilities under the Prevent Duty, including reporting procedures, with the student body. This was included as part of our

induction sessions with all new and returning students, held at the beginning of the academic year (October, 2016). It has also been included in conversations with Student Representatives at Student Faculty Meetings, and at Boards of Studies where student representatives are present.

- An important part of implementing the Strategy is engagement with other partners. We have discussed issues with those from other Colleges and with our validating University (the University of Chester), and have received information about other local groups. We have had no issues that have needed to be addressed under the Prevent Duty, and so have not had occasion to raise issues with partners. We intend, though, in the next few months to make informal contact with other agencies.
- In the coming months, the Prevent Lead and other key staff will attend training workshop, particularly in areas of weakness, which will, no doubt, be highlighted when we receive feedback on our revised documents.

This report together with all associated documents – including the Prevent Duty Strategy, Risk Assessment and Action Plan and Internet Acceptable Use policies have been approved and authorised by the Institution’s Accountable Officer, Dr Robin Routledge.

Robin Routledge


25 January 2017

(revised following further discussions, April, 2017)

22 May 2017

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Dear Dr Routledge

Prevent duty annual reporting: monitoring outcome

Thank you for submitting your Prevent annual report documentation in February. After careful consideration of the report, I am pleased to inform you that, subject to the Chair of your governing body or the Proprietor returning signed declarations to us, we have concluded that in our view the information provided **demonstrated sufficient evidence of due regard to the Prevent duty**. I reached this conclusion following advice from HEFCE officers.

Outstanding actions from the detailed assessment (June 2016)

We concluded that the further information provided **demonstrated that you have had regard to the statutory Prevent Guidance fully** and have suitable policies, procedures and arrangements in place to meet the requirements of the duty. This conclusion assumes that these arrangements are being and will continue to be applied actively.

Conclusions from the annual report

While overall we felt the information provided demonstrated evidence of active implementation, we wish to draw your attention to areas where further consideration should be given:

- I note you have confirmed there is no formal monitoring of student-led events and activities however the additional information suggests that you will conduct 'a risk assessment where a concern has been raised'. You should therefore ensure that

students and staff understand what they need to do if they have a concern regarding an event or activity, who they should contact and what they will be required to do as a result. This process should be proportionate and should be communicated to your student and staff cohorts. You should provide further details to HEFCE once this has been completed.

- I note the material submitted contains reference to fundamental British values. The higher education specific statutory guidance for Prevent does not place an explicit requirement for providers to promote fundamental British values in order to demonstrate due regard. Therefore, you should consider whether it is appropriate for you to cite this definition and make reference to fundamental British values in your Prevent Duty Strategy.
- It was not evident from the material submitted what the referral pathway for staff-related welfare concerns is. You will need to provide detail of this mechanism to HEFCE.
- I note from the material submitted that where there is a suggestion that a student or member of staff is being radicalised or drawn into a context that might lead to terrorism, this would be reported to senior management and handled as per the disciplinary and welfare process. You should consider whether this is an appropriate course of action or whether this should be handled through your existing welfare processes. Please ensure you communicate any subsequent changes to the Prevent Duty Strategy to HEFCE.

Next steps

We will contact the Prevent lead at your institution shortly regarding the points above. We will also be able to provide further detailed feedback on your submission if required.

Your next annual report will be due on 1 February 2018. In the meantime any serious Prevent-related incidents or significant changes to policies should be reported to your Prevent Adviser.

Yours sincerely

A handwritten signature in black ink that reads "Y. Hawkins" with a stylized flourish at the end.

Yvonne Hawkins
Director Universities/Colleges