

### 'PREVENT' POLICY

1. Goodenough College is an intellectual community existing in support of College Members pursuing graduate study in London. It is committed to academic freedom, debate and contestation.
2. The academic topics studied and researched by Goodenough Members in London's universities may be politically, ethically and socially sensitive, and wide-ranging in geographical and political scope. Scientific and philosophical analysis may have political implications. Criticising government policy, expressing support for specific groups, identifying causal relations between policies, processes and events, subjecting public arguments to evaluation and critique – these are all legitimate aspects of the reflection of an intellectual community. They also contribute to public and political debate.
3. Goodenough is deeply committed to fostering an academic culture of openness and inclusivity, in which members of the College community engage with each other in debate and discussion and remain open to both intellectual challenge and to change. Academic discourse in College is conducted in such a way as to promote the values of truth, reliability, validity, and good scholarship. No single approach or settled belief can be privileged. Everyone is open to having their views challenged, and to develop critical ways of thinking about their own positions. Exchange of views must be respectful, and is subject always to standards of civility.
4. Goodenough College actively encourages its Members to convene discussions and debates, organise seminars, invite external speakers to the College and engage fully in its intellectual life.
5. Goodenough College exists in support of London's universities. It notes that these universities (and other universities which visit the College's Scottish estate, The Burn) also have duties with respect to free speech that are reflected in the Education Act 1986; the Education Reform Act 1988; the Human Rights Act 1998; the Equality Act 2010 and the Counter-Terrorism and Security Act 2015. These all explicitly note that universities have a duty to uphold freedom of expression and academic freedom. The College believes that it, too, has an important duty to protect free academic enquiry and free speech. This is expressed in the College's Freedom of Speech protocol.
6. At the same time, Goodenough College notes that in virtue of the Counter-Terrorism and Security Act 2015, s. 15, universities have a *further* obligation to have 'due regard to the need to prevent people from being drawn into terrorism' in pursuance of their 'functions'. Though not itself a university, Goodenough College embraces voluntarily this same duty.
7. In consideration of its voluntary adherence to these duties, the College has adopted the following strategies. These strategies apply both to the College's London estate and to The Burn.



## Appointment of a 'Prevent' Lead and other Key Individuals

8. The College shall appoint a 'Prevent' Lead for the College (currently the Dean) and shall identify key individuals. Key individuals shall include the 'Prevent' Lead, the Director, the Dean, the Head of External Events, the Head of Reception and Security and the Bursar at The Burn. These individuals shall be made aware of, and shall consistently have in mind, the College's duties with respect to free speech and academic freedom, as reflected in UK legislation: the Education Act 1986; the Education Reform Act 1988; the Human Rights Act 1998; the Equality Act 2010; and the Counter-Terrorism and Security Act 2015. These all explicitly note that universities (and, by voluntary acceptance, Goodenough College) have a duty to uphold freedom of expression and academic freedom. Key individuals shall also be made aware that in virtue of the Counter-Terrorism and Security Act 2015, s. 15, Goodenough College sustains a further voluntarily accepted requirement to have 'due regard to the need to prevent people from being drawn into terrorism' in pursuance of its 'functions'.

## Communication and Co-operation with Other Bodies

9. The 'Prevent' Lead may establish and maintain communication with local Prevent co-ordinators, the Police and local authorities, from time to time as necessary.

## Meetings in College (or in connection with College events)

10. College Members and Member clubs or societies wishing to hold meetings on College premises, in connection with College events or using the College name or IT facilities, must have the permission of the Dean before any external speakers may be invited. The Dean shall apply various criteria in giving or withholding such permission, including considering whether the Prevent duty creates a reason to withhold such permission.
11. In giving or withholding permission, the Dean shall also have in mind considerations regarding the College's commitment to freedom of speech, academic freedom, debate and contestation and their importance, and also any considerations of health and safety. Before reaching a decision, the Dean may request information about the speaker and event. Any such requests shall be limited and proportionate to the strict requirements of the 'Prevent' duty. The information shall be given in a timely fashion.
12. The Dean may give or withhold permission, or give permission subject to conditions. Permission shall be withheld on grounds arising from the 'Prevent' duty only when this is absolutely necessary; when all possible options for mitigating any perceived risk have been fully explored; and when the importance of maintaining academic freedom, free speech and respecting the rights of individuals have been given full weight. Any conditions imposed as a result of the 'Prevent' duty shall be those judged necessary and proportionate. If either permission is withheld or conditions are imposed because of the 'Prevent' duty, the Dean shall give a clear statement of reasons.



13. If the Dean refuses permission or imposes conditions on grounds arising from the 'Prevent' duty, the Member organisers of the meeting may appeal to the Director. The Director shall determine the question on the bases described above and may then substitute for that of the Dean their own decision, including as to conditions. If the Director imposes conditions different from those imposed by the Dean, they shall give a clear statement of reasons for the imposition of those conditions. The Director's decision is final.
14. If the Director, the Dean or another staff College member intends to hold a meeting on College premises or in connection with College events at which there will be any outside speakers, they must consider whether there is a significant risk of a person being drawn into terrorism as a result of that meeting. If they judge there is such a risk, they shall seek the advice of the 'Prevent' Lead or other appropriate person as to how the risk can be sufficiently mitigated so as to allow the event to proceed. If such mitigation is impossible, they shall refer to the 'Prevent' Lead the question of whether the event should go ahead. The 'Prevent' Lead shall decide that question, having full regard to the obligations outlined above.
15. When arranging events with external speakers, the Dean or a member of their team will issue the speaker(s) with a copy of the College's Freedom of Speech protocol. The Dean is responsible for regularly reviewing and updating this document; and briefing the College's Academic Committee and the Members' Council on its contents.

## External Events

16. Where facilities are booked through the Conference Office or at The Burn, other than by senior staff or Members of the College, the Head of External Events or the Burn Bursar, respectively, shall make a risk assessment as required by the 'Prevent' duty. If they judge the 'Prevent' duty may give rise to a reason not to host the event or to impose conditions on it, they shall refer the question to the 'Prevent' Lead. The 'Prevent' Lead shall decide what response is to be given in the light of the importance of free speech, equality, academic freedom, and lively debate, and having regard to the 'Prevent' duty. Any decision to prohibit an event on grounds arising from the 'Prevent' duty shall be notified to the Executive team immediately following the decision.
17. The following language shall be added to the College's venue hire terms and conditions:  
*"The Venue reserves the right to cancel your booking at any time in the event that:*



*(a) the Venue has reason to believe that the event is in breach of Goodenough College's Prevent policy (which is issued as part of the UK Government's anti-terrorism Prevent strategy). This includes any events that, in the College's view, are likely to express or constitute extremist views by way of subject matter or invites encouragement or support for a proscribed terrorist organisation; or*

*(b) the booking might, in the opinion of the Venue, prejudice the reputation of the Venue. In the event of such cancellation no refund will be payable and we reserve the right to raise an additional invoice in respect of unavoidable and/or committed costs incurred in servicing the booking."*

18. A register of events which are prohibited or those on which conditions are imposed because of the 'Prevent' duty shall be maintained by the 'Prevent' Lead and shall be available for inspection by the Board.

### **Student & Staff Welfare**

19. The welfare team is overseen by the Dean, who exercises the same regard to freedom of speech and freedom of religious expression, as governed by College policies, and respects the confidentiality and privacy of all College Members except where the law requires otherwise.

### **Use of Faith Facilities**

20. The management and use of the College's faith facilities is regulated by the Dean and the College Chaplains. Use of the Chapel is granted for private and collective prayer with the express permission of the Dean and Chaplains and following a risk assessment. Collective prayer shall in all instances be open to the attendance of the College community.

### **Use of IT facilities**

21. All those connecting to IT facilities of the College (including at The Burn) must abide by the College's IT rules as a strict condition of use. College IT facilities must not be used for any criminal activity. Those creating websites which do, or purport to, represent the College or its activities shall avoid discrimination, respect the rights to academic freedom and free speech, be open at all times to debate and challenge and have regard to the danger of individuals known or unknown being drawn into terrorism.

### **Use of Social Media**

22. The College maintains an open Facebook page, alongside closed Alumni, College Member and Parents Groups. College staff also manage open Instagram and Twitter platforms.
23. Codes of online conduct exist for Members and Alumni. The College also maintains a social media policy for staff, set out clearly in the Staff Handbook.
24. College staff shall regularly monitor the College's presence on digital platforms. In the event of material that gives cause for concern appearing in a College-moderated environment, it shall be reported immediately to the 'Prevent' Lead, who shall decide, with due respect for and consideration of College policy on freedom of



speech and freedom of religious expression, whether the content should be removed. The College shall encourage Members to report to senior College staff any posts, photographs, video and Direct Messaging that may warrant investigation in the context of the College 'Prevent' policy.

### **'Prevent' Compliance**

25. It is the policy of the College that, where appropriate, College policies incorporate recognition of the College's duties in respect of free expression, academic freedom, equality and privacy and the 'Prevent' duty, and that they be regularly checked to ensure that they do. In checking the operation of its policies, the College will further ensure that no discrimination, suppression of debate or compromise of academic freedom has or might occur.

### **Risk Register and Reporting**

26. Risks concerning the 'Prevent' duty shall be noted in a 'Prevent' risk register, held by the 'Prevent' Lead. This register will include the risk of academic freedom or individual rights being infringed. It will not include mention of individuals or groups within College.

### **Referral Protocol**

27. Where the College is in possession of information suggesting that a College member or a staff member may be drawn into Terrorism as defined by the Terrorism Act, the 'Prevent' Lead and/or the Director must consider sharing this information with other authorities (such as the Police, Local Authority, a Member's university or the Department for Education counter-extremism helpline). Such information shall be shared only when all proper consideration has been given to individual's rights to privacy and confidentiality, and:
  - it is necessary to share it;
  - it is proportionate to the intended outcome;
  - sharing it is permitted under the Data Protection Act 1998 and the Human Rights Act 1998;
  - every appropriate effort has been made to obtain the consent of the person about whom information is shared.
28. If a College Member or staff member appears to be planning to travel to join an extremist group - either alone or as part of a family unit or friendship group - or involved in an act which appears to be terrorism-related, the 'Prevent' Lead or other appropriate individual must call 999 or the Anti-Terrorist Hotline on 0800 789 321.

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29. The College shall provide briefing on its 'Prevent' policy for the Director, the Dean and their team, The Burn Bursar, other senior staff, the Head of External Events, the Alumni Manager, the Head of Reception and Security, Duty Managers, House Administrators and other staff as appropriate. Members who shall receive a briefing include the Members' Council Chair, College House Representatives, the Community and Welfare Representatives and the Clubs and Societies Representatives. The briefing will ensure that all concerned understand the importance of academic



freedom, freedom of expression and human rights, and the significance of the Education Act 1986; the Education Reform Act 1988; the Human Rights Act 1998; the Equality Act 2010 and the Counter-Terrorism and Security Act 2015 for the College's policy, and that the Prevent duty operates within the context set by these.

30. This College 'Prevent' policy shall be shared, upon request, with the organisers of any external event making use of College venues, as background to the College's venue hire terms and conditions.

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31. This policy is subject to annual review, instigated by the Prevent Lead.

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