

Prevent Duty

Reviewed June 2022

The Federation (company number 04700056) is in the scope of Prevent legislation because it is a registered higher education provider with the Office for Students. This means that the Federation “must, in the exercise of its functions, have due regard to the need to prevent people from being drawn into terrorism”¹.

Because the Federation’s member institutions (‘Houses’) are independent legal entities and are not registered with Office for Students they do not come under the scope of the Prevent Duty. Not everyone at a House is a Federation student but those students at Houses who are registered with the Federation come under the scope of the duty when the Federation is acting in its capacity as a higher education provider. The Houses are not comparable to the Cambridge Colleges which are only in the scope of the Prevent duty by specific legislation.

The Prevent Duty does cover:

- All full time & part time students registered with the Federation, whether taught in classrooms in the UK, on a Federation placement, or through distance learning.²
- Events arranged by the Federation, including Federation worship.
- Activities at the Bounds House premises (which is the only property owned by the Federation)
- Those teaching on behalf of the Federation, whether employed by the Federation or not.

The Prevent Duty does not cover:

- Participants on unaccredited courses
- Events arranged by Houses or their students which are not events arranged on behalf of Federation³.

Freedom of expression

The Federation has duties to ensure freedom of speech and academic freedom which are not overridden by the Prevent duty.

Risk Assessment

The Federation has undertaken an assessment of the risk of students and staff being drawn into terrorism. The Board considers that the policies and procedures in place, as detailed in this document and risk assessment, are sufficient to minimise the risk to a “**low**” level.

¹ Counter-Terrorism and Security Act 2015. Part 5, Chapter 1

² “Providers subject to the duty should have arrangements in place covering all students registered with them. This includes all modes of study (full-time, part-time, and postgraduate); on-campus and distance learning; all nationalities (UK, EU and international). (“Prevent duty monitoring in higher education in England Supplementary information note”)

³ Inviting other students to join events does not necessarily make them Federation events

Speakers

The Federation has adopted a policy and procedure for events with external speakers (see below) to minimise the risk of speakers drawing students and staff into extremism. The Federation rarely arranges events outside of regular curriculum teaching or research seminars. There is a “**very low**” risk of Federation events taking place that will draw staff or students into extremism.

Training

All Federation staff and those with teaching, supervisory or pastoral responsibilities for Federation students must complete Prevent training or provide evidence they have completed equivalent training in the previous three years. They are then required to complete a Prevent Refresher module every three years.

Prevent training is obligatory for all First Supervisors of PGR students and optional for Second Supervisors.

Both training modules are accessible at
<https://hedwig.theofed.cam.ac.uk/course/view.php?id=648>

You will need to let the Bounds House staff know details of what training you completed and the date, unless it is through Hedwig, in which case details will be recorded there.

Welfare, pastoral care and chaplaincy support

The Federation only employs administrative staff. It does not employ any staff with pastoral or chaplaincy roles.

The Federation has no faith spaces in the Bounds House office, which is its only property.

All students who also belong to a House are provided with welfare, pastoral care and chaplaincy support through that House.

Students admitted directly to the Federation only have access to welfare, pastoral care or chaplaincy support through informal arrangements with staff at one of the Houses, as the need arises. The only students admitted directly to the Federation are some part time students studying for a Professional Doctorate with Anglia Ruskin University and some part time students studying for a Chaplaincy MA in partnership with the Northern Ireland Healthcare Chaplains Association.

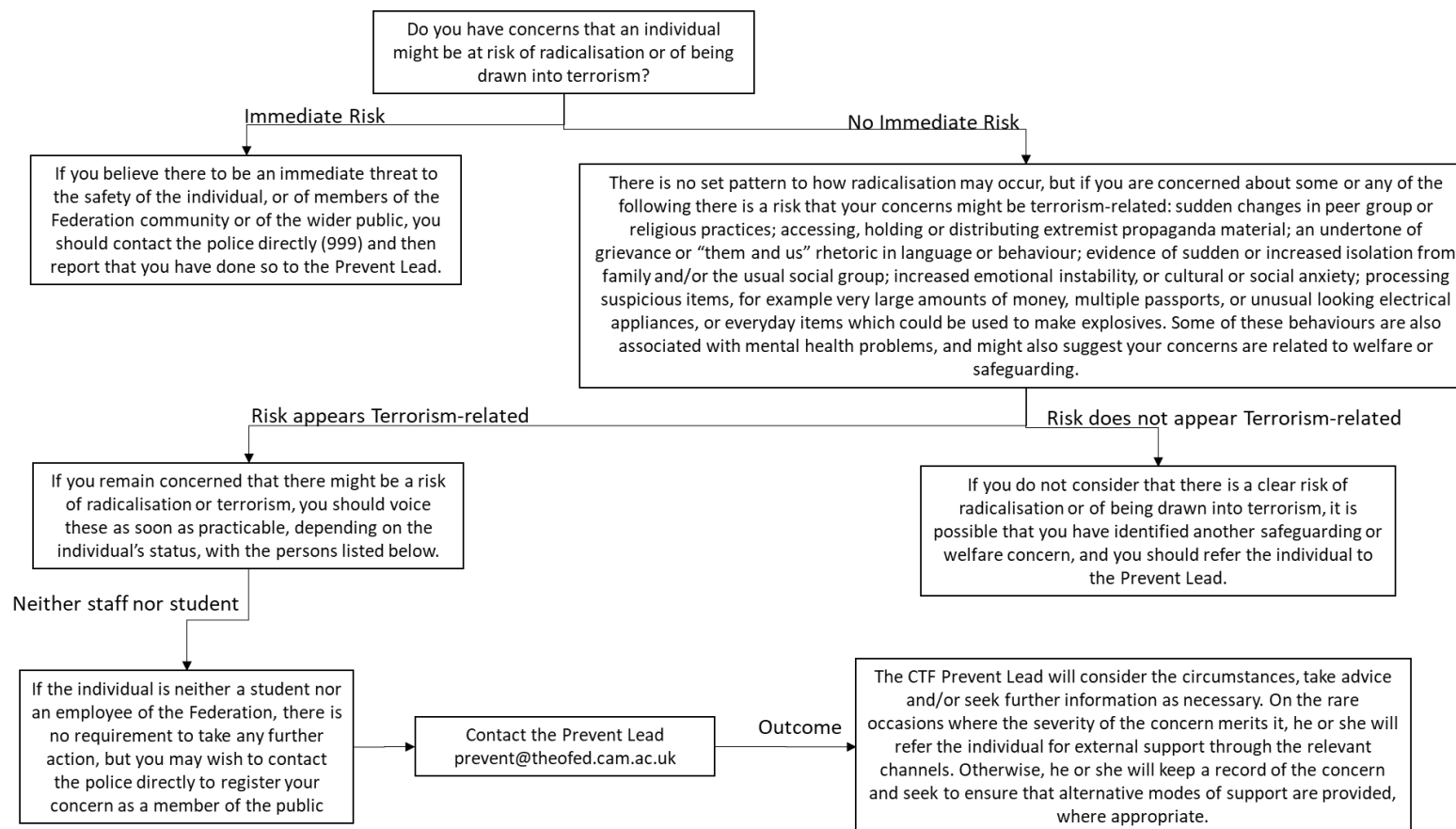
IT policy

The Federation’s IT policy is available at www.theofed.cam.ac.uk/policies. It applies to everyone who uses the Federation’s IT infrastructure and services, which includes all registered students, Federation staff, and some teaching and administrative staff from the member institutions.

Students union

There is no students union at the Federation. A Student Forum exists as a consultative and representative group.

Process for reporting Prevent concerns



The Federation Prevent Lead will report relevant concerns about BTh students to the Divinity Faculty on administrator@divinity.cam.ac.uk.

The Federation Prevent Lead will report relevant concerns about Anglia students to Paul Bogle (paul.bogle@anglia.ac.uk) as Secretary & Clerk and copied to his PA louise.andrews@anglia.ac.uk.

Events with External Speakers policy and procedure (Prevent Duty)

Policy

All speakers at Cambridge Theological Federation events have a responsibility to abide by the law and:

- Must not contravene the Federation's Statement on Freedom of Speech and Expression
- Must not advocate or incite hatred, violence or call for the breaking of the law
- Are not permitted to encourage, glorify or promote any acts of terrorism including individuals, groups or organisations that support such acts
- Must not spread hatred and intolerance in the community and thus aid in disrupting social and community harmony
- Must be mindful of the risk of causing offence to or seek to avoid insulting other faiths or groups, within a framework of positive debate and challenge
- Are not permitted to raise or gather funds for any external organisation or cause without the Federation's express permission.

As a condition of being able to participate in Federation events, all external speakers are required to act in accordance with the policy statement above at all times.

Definitions

An **external speaker** is deemed to be anybody who is neither a registered student, a member of staff or a Director of the Federation. For the purposes of this policy, students, staff and trustees from each of the Federation's member institutions are treated as "internal speakers", as are teaching staff from Universities with whom we have partnership contracts (Anglia Ruskin University, Durham University and the University of Cambridge).

An **event** may be one that is hosted on Federation premises or in the name of the Federation at an external venue.

Booking requests for events with external speakers

Booking requests for events with external speakers should be made to the Bounds House office using the contact details on the website: www.theofed.cam.ac.uk/contact. Bookings must be made no later than 14 days before the date of the event. This is to allow for adequate checks as well as allowing time for alterations to the event if necessary.

Events involving external speakers may not be publicised until the event is confirmed. This

includes advertisement through any social media platform.

Events with enforced segregation will not be accepted.

Approving an event

In deciding whether to approve an event, the Federation aims to abide by all relevant legislation, in particular its duties to ensure freedom of speech with reference to the Education Act 1982, its duty to prevent people from being drawn into terrorism with reference to the Counter Terrorism and Security Act 2015 and its obligation to prevent individuals from discrimination under the Equality Act 2010.

The Federation Prevent Lead is responsible for risk-assessing the event based on:

- The potential for any decision to limit freedom of speech
- The potential for the event going ahead to cause risk to the Federation's reputation
- The potential for the speaker's presence on site to cause fear or alarm to students or members of staff and/or to give rise to breach of peace
- The potential of a speaker to cause incitement to commit criminal acts, the expression of hate speech, or radicalisation of attendees.

One of the following decisions will be made:

- To permit the event to go ahead without restriction
- To permit the event to go ahead with agreed steps to reduce risk (e.g. the inclusion of opportunities to debate or challenge the view being held)
- To permit the event but refuse a particular speaker
- To refuse the event.

In the spirit of debate, the Federation will normally seek to ensure that events or speakers identified as posing a risk will go ahead subject to the agreement of appropriate safeguards. Cancellation of an event will only occur in exceptional circumstances, for example on the advice of Police.

Reasons for refusing an event booking could include (but are not restricted to):

- A person or group on, or linked to, the UK Government list of proscribed terror organisations
- Talks by organisations generally considered to be extremist
- A speaker who is known to have spoken previously at another institution on a topic that has caused fear or intimidation of students or staff
- A speaker is considered to be accepted in the mainstream as being highly controversial
- A link or links to any person or group that has been connected with any controversy of a negative or positive nature
- A speaker who has significant profile and attracts a following that could create crowd control and safety issues.

Steps that can be taken to reduce risk (at the organisers' cost) include:

- Appoint an independent Chair for the event
- Requesting submission of the speeches in advance of the event
- Placing a limit on attendees
- Seeking declaration of attendees in advance of the event
- Requesting stewards be provided by the organisers
- Placing a limitation on what attendees may bring to the event, which may include banning food or drink or anything that could be used as a potential weapon
- Placing a ban on banners, flags, placards or similar items being allowed into the venue and its immediate surroundings

- Altering the conduct of the meeting and/or its facilitation.

Cambridge Theological Federation Prevent Risk Assessment

This assessment follows the requirement in the “Prevent Duty Guidance for higher education institutions in England and Wales” (HM Government revised July 2015) for higher education bodies “to carry out a risk assessment for their institution which assesses where and how their students might be at risk of being drawn into terrorism”.

Where students might be at risk of being drawn into terrorism

The activities that the Federation carries out in exercise of its functions are:

- Teaching students
- Arranging practical placements for some students
- Arranging corporate worship at non- Federation locations
- Administering student records
- Maintaining library systems

The first three of these could conceivably provide opportunities for drawing students into terrorism.

The Federation does not have any residential or social facilities.

How students might be at risk of being drawn into terrorism

Students could be drawn into terrorism by:

- Teaching staff
- Administrative staff
- Other students
- Speakers from outside of the Federation
- People they meet whilst on placements
- Online activity

Likelihood of students being drawn into terrorism

There is nothing in the taught curriculum that is likely to draw students into terrorism. Research topics that increase the likelihood of students being drawn into terrorism are not permitted.

Students do not have sustained contact with administrative staff and so are unlikely to be drawn into terrorism by them.

The likelihood of students being drawn into terrorism by other students is low, particularly as the majority of students are either in or training for leadership positions in the Christian churches. The risk of drawing students into terrorism is considered to be “**low**”.

The Federation does not arrange events outside of the curriculum. All speakers from outside the

Federation are engaged to teach content regulated by the curriculum and are chosen for their expertise in the relevant area. There is a “**low**” risk of engaging speakers likely to draw students into terrorism.

It is harder to manage the contacts that students will have whilst they are on placements provided by the Federation. However, the placements are all in a pastoral context and designed not to put students at any risk. They include structures for support and feedback with tutors and safeguarding protections. In this context the risk of students being drawn into terrorism is “**low**”.

The Federation does not monitor online activity of staff or students. Whilst this is a higher risk than other areas, purely because of unmediated access to extremist views, the Board considers that in the context of the Federation the likelihood remains “**low**”.

Federation Worship is primarily Christian in context, though occasionally has elements from other Abrahamic faiths. It is attended by students and staff from across the Houses. It does not provide an opportunity for drawing students into terrorism.

Actions taken to minimise the risk of students being drawn into terrorism

All staff who teach and supervise Federation students in the UK are required to undertake Prevent awareness training. All Federation administrative staff undertake Prevent awareness training.

A clear reporting procedure is in place for responding to concerns about students being drawn into terrorism.

The following policies assist minimising the risk:

- Anti-bullying and harassment
- Complaints procedure
- Freedom of speech
- IT policy
- Placement policy
- Social Media

There are no particular measures relating to the physical management of the estate in the context of the Prevent duty. The estate only consists of one building where the Federation’s office is located. Any external events held in its meeting rooms would be in accordance with the “Risk management of external events” policy.

The Prevent duty is an item on the Federation’s main Risk Register.