

<b>Procedure 6.16 Prevent Duty (Racist, Discriminatory, Abusive and Extremist Behaviour)</b>					
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<b>Review No</b>	6	<b>Next Review Date</b>	August 2022	<b>Approved on</b>	19/08/2021

**Procedure Issued** : April 2014

**Procedure Owner** : Principal / CEO

- ❖ This procedure is shared with our students and/or can be obtained:
  - on our website <https://docklandsacademy.co.uk/policies-and-procedures>,
  - on the desktops of all computers in the library on the top floor,
  - by emailing us at [info@docklandsacademy.co.uk](mailto:info@docklandsacademy.co.uk).
- ❖ Also, our students are informed about the main aspects of the procedure in the Student Handbooks, Induction Seminar and Learning Agreement.
- ❖ The procedure is reviewed and monitored on a regular basis for currency and fitness as part of our 1.9 Annual Policy and Procedures Review.

## **1. Introduction**

- 1.1** The effect of racial and discriminatory attacks, harassment and abuse can be particularly stressful and frightening for all members of the communities which are present in the Academy.
- 1.2** It is essential for the Academy to establish a racial, discriminatory, abusive or extremist incident recording procedure separate from the procedure for recording complaints.

## **2. Statement**

- 2.1** The Academy is committed to taking all necessary steps to eliminate racist, discriminatory, abusive or extremist conduct throughout its premises. It will actively promote good relations between all minority ethnic groups. This procedure is designed to ensure that complaints are resolved quickly.
- 2.2** We aim to achieve this by:
- accepting the recognised definition of a racist, discriminatory, abusive or extremist incident.
  - having a structured reporting procedure in the Academy.
  - raising the awareness of racist, discriminatory, abusive or extremist inequality throughout the Academy
  - displaying the Fundamental British values on noticeboards around the Academy and, where appropriate, linking teaching and learning to these values and subject areas.

- ensuring continuity of service for victims.
- enforcing the relevant legislation.
- providing access to mandatory Prevent and Safeguarding trainings annually to all staff to ensure they are continuously informed and reminded of legislative requirements.
- providing access to mandatory Equality and Diversity training to all staff to ensure they are continuously informed and reminded of legislative requirements.
- having structured equality and diversity arrangements for all staff and students.

### **3. Definition of a Racist and Discriminatory Incident**

A racist incident is *any incident which is perceived to be racist by the victim or any other person*. This definition is recommended by the MacPherson report (1999) and has been adopted by the Academy. Incidents may come to light in various ways:

- A member of staff may witness an incident.
- A victim may disclose a concern to a member of staff.
- A member of staff may be informed by someone else.
- An incidental remark may be heard.
- A complaint may be made by an anxious parent or partner.
- A phone call may be made.

### **4. Definition of Abusive and Extremist Behaviour**

#### **4.1 Definition of Abuse:**

- **Verbal** : calling someone names, saying bad things or using bad language
- **Physical** : pushing, hitting, kicking people or damaging property
- **Emotional** : making someone feel disliked, ridiculing or teasing

#### **4.2 Definition of Extremism:**

- A person who holds extreme religious (or political) views, especially one who advocates illegal, violent, or other extreme actions (Oxford)
- 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
- That which calls for the death of members of our armed forces, whether in this country or overseas.

#### **4.3 Definition of Radicalisation:**

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

### **5. Identifying Abuse or Extremism**

**5.1** Physical or verbal abuse is easier to identify than emotional abuse, which may require someone to come forward and complain.

**5.2** Extremist behaviour is a personal judgement, but staff and students are expected to conform with and exemplify the core British values that extremist and abusive behaviour contravenes. These are:

- Democracy - everyone's opinion is important and counts
- Individual Liberty - freedom to be what you want if it is legal
- Respect and Tolerance – do not insult others or discriminate
- Rule of Law - observe the UK law and treat everyone equally

### 5.3 Incidents may come to light in various ways:

- a member of staff or student may witness an incident
- a victim may disclose a concern to a member of staff
- a member of staff may be informed by someone else
- an incidental remark may be heard
- a complaint may be made by an anxious parent or partner
- a phone call may be made

## 6. Procedure to be Followed

- 6.1 Where any incident mentioned in Sections 3, 4 and 5 is made known to a member of staff, that member of staff should inform the Designated Safeguarding Lead (hereafter the DSL) (or if the complaint is about the DSL, then to the CEO / Principal or if it is about the CEO / Principal, then to the Directors) within 24 hours of the incident by filling in a **Racist, Discriminatory, Abusive or Extremist Incident Form**.
- 6.2 The DSL and/or CEO/Principal will investigate all claims of a racist, discriminative, abusive or extremist incident occurring.
- 6.3 It is important that reassurance is given to the victim / person reporting that this report is being taken seriously and they will receive support from the Academy. The safety of the victim should be paramount. However, no guarantees of confidentiality or anonymity can be given.
- 6.4 Disciplinary action will be sought against those who are racist, discriminative, abusive or extremist within the Academy. **This will be in accordance with standard Academy disciplinary procedures for investigating claims of significant misconduct. In the case of Employees as the perpetrator, advice will be sought in the first instance before suspension/disciplinary action commences.**
- 6.5 An immediate step is to suspend the perpetrator from classes / duties, as a neutral act, to investigate the issues will be the usual initial action.
- 6.6 If the DSL and/or CEO/Principal deem the incident high-risk, they have a responsibility to report it to the Tower Hamlets LADO (Local Authority Designated Officer) Melanie Benzie on [Melanie.benzie@towerhamlets.gov.uk](mailto:Melanie.benzie@towerhamlets.gov.uk) or any other available persons within the department on [LADO@towerhamlets.gov.uk](mailto:LADO@towerhamlets.gov.uk) or, in extreme cases the police by calling 999. If the DSL and/or CEO/Principal is unable to determine the severity of an incident, further immediate support can be acquired by calling 101.
- 6.7 The DSL and/or CEO/Principal will seek relevant external advice if necessary and will advise the Directors of the incident.
- 6.8 The DSL and/or the CEO / Principal will inform the stakeholders, and advise the Academic Head and Directors of the outcome of their investigation **with Racist, Discriminatory, Abusive or Extremist Incident Outcome Report** in 2 weeks following the closure of the case.

- 6.9 **An Annual Monitoring Review** of abusive and extremist incidents will be conducted, and a report made available by the Academic Quality Coordinator and discussed at the Quality Committee meeting, then shared with all external stakeholders at the Board of Governance meeting taking place at the summer term.

## **7. Related Documents**

### **7.1 Policies**

- 1 Governance
- 2 Academic Management
- 3 Teaching Learning Assessment
- 4 Student Admissions
- 5 Student Support, Engagement and Learning Resources
- 7 Information

### **7.2 Procedures**

- 1.5 Equal Opportunities
- 1.7 Data Protection
- 1.9 Review and Revision of Policies and Procedures
- 2.6 Self-Assessment and Programme and Annual monitoring
- 2.10 Special Circumstances Affecting Study
- 2.11 Pearson Learner Registration
- 2.12 Contingency and Adverse Effects
- 3.1 Expectations from and Supporting Staff in Teaching Delivery
- 3.4 Tutorial Arrangements
- 3.5 Assessment Expectations
- 4.6 Student Induction
- 4.10 Refund of Tuition Fees and Compensation
- 4.11 Student Protection Plan
- 4.13 Transfers Suspensions Withdrawals Closure and Change of HE Provision
- 4.14 Fees Charges and Financial Support
- 5.2 Welfare Services and Pastoral Care
- 5.3 Equality, Diversity and Special Needs
- 5.7 Reviewing Learning Resources
- 6.1 Recruitment and Selection
- 6.2 New Starters and Induction
- 6.3 Equality and Diversity
- 6.4 Personal Development Review and Appraisal
- 6.5 Discipline at Work
- 6.6 Absenteeism and Lateness
- 6.7 Holiday and Leave Entitlement
- 6.8 Grievances and Complaints
- 6.9 Continuing Professional Development (CPD)
- 6.10.1 Higher Education Lesson Observation
- 6.10.2 Peer Review

- **6.10.3** English Language Teacher Observation
- **6.11** Requests for Training and Scholarly Activity
- **6.12** Evaluation of the Effectiveness of Training and Development
- **6.13** Staff Code of Conduct
- **6.14** Academic Misconduct by Staff
- **6.15** Safeguarding
- **7.1** Review and Sign off PI
- **7.2** External Review of the Website and Printed Information
- **7.3** Social Media Protocols
- **7.4** HE Public Information Procedures
- **8.2** Recruitment Partner Selection and Monitoring
- **8.3** Links with Other Educational Institutions and Businesses
- **9.1** Access Procedures
- **9.2** Maintenance Procedure
- **9.3** Fire Plan and Strategy
- **9.4a** Health and Safety Risk Assessment
- **9.5** First Aid and Accident Reporting
- **9.6** Business Continuity Plan

### 7.3 Terms and Conditions

### 7.4 External Reference Points

- **Office for Students (OfS) Requirements and Guidance** at <https://www.officeforstudents.org.uk/advice-and-guidance/regulation/>
- **UK Quality Code Advice & Guidance – Admissions, Recruitment and Widening Access** at <https://www.qaa.ac.uk/en/quality-code/advice-and-guidance/admissions-recruitment-and-widening-access>
- **UK Quality Code Advice & Guidance – Concerns, Complaints and Appeals** at <https://www.qaa.ac.uk/en/quality-code/advice-and-guidance/concerns-complaints-and-appeals>
- **Higher Education Code of Governance** (Committee of University Chairs, December 2014) at <https://www.universitychairs.ac.uk/wp-content/uploads/2020/09/CUC-HE-Code-of-Governance-publication-final.pdf>
- **Association of Employment and Learning Providers (AELP) principles of Good Governance for Independent Training Providers** at <https://www.aelp.org.uk/media/2595/code-of-governance-final-sept-2018.pdf>
- **OIA The Good Practice Framework: Handling Students Complaints and Academic Appeals** at <https://www.oiahe.org.uk/media/1859/oia-good-practice-framework.pdf>
- **UKCISA Code of Ethics** at <https://www.ukcisa.org.uk/Membership/Codes-of-practice/Code-of-ethics>
- **Equality Act – 2010** at <https://www.legislation.gov.uk/ukpga/2010/15/contents>
- **Keeping Children Safe in Education Jan 2021 Guidance** at <https://www.gov.uk/government/publications/keeping-children-safe-in-education--2>
- **MacPherson report (1999) (Racism)** at <https://www.gov.uk/government/publications/the-stephen-lawrence-inquiry>
- **Sex Offences Act 2003** at <https://www.legislation.gov.uk/ukpga/2003/42/contents>
- **Terrorism Act 2006** at <https://www.legislation.gov.uk/ukpga/2006/11/contents>
- **Tower Hamlets LADO (Local Authority Designated Officer)** at [LADO@towerhamlets.gov.uk](mailto:LADO@towerhamlets.gov.uk)



## Procedure 6.16 Prevent Duty: Risk Assessment & Action Plan

No	Prevent Vulnerability/Risk Area	What is already done/being done? (& evidence)	What still needs to be done?	By when?
1	<b>Leadership</b> Are owner / senior managers / aware of and had training in their 'Prevent Duty' responsibilities?	All staff at operational level, including senior managers have received training (see point 3 below).	The Prevent Lead needs to ensure staff have regular updates on prevent duty responsibilities and that any new staff are given information on prevent and British values during induction training.	Jan 2021
2	<b>Internal and external contacts</b> (a) Has internal Prevent lead been appointed? Is person known to all? (b) Has that person made contact with local police/local authority prevent coordinator and got contact details?	<p>Yes, Burcu Selin Doyan (Academic Quality Coordinator) received Prevent Duty level 2 Training and has been appointed as Prevent Lead for Docklands Academy London. She has been known to all at Docklands Academy London.</p> <p>Ercan Erkus (Academic Head), is also the Designated Safeguarding Lead for the academy therefore oversees any concerns relating to Prevent.</p> <p>Burcu Selin Doyan contacted the local Limehouse Police Station to find out the requirements to be appointed as a Prevent Lead and got a contact name and number from the local prevent coordinator.</p> <p><b>Jasmin Phillips</b> Prevent Education Officer, London Borough of Tower Hamlets Community Safety and the Officer was contacted and she replied as; "There are no additional training provided by the Council in regards to becoming a Prevent Lead. This is something the institution would decide internally. However, I am happy to deliver Prevent training if that would be helpful. Alternatively there is e-learning in my signature. There are also resources on <a href="http://educateagainsthate.com">educateagainsthate.com</a>".</p>	<p>The contact details are as follows and kept safe in our records.</p> <p><b>Jasmin Phillips</b> Prevent Education Officer London Borough of Tower Hamlets Community Safety 6th Floor - Mulberry Place 5 Clove Crescent London E14 2BG</p> <p>Mob: 07984 277158 Phone: 0207 364 2414 Email: <a href="mailto:jasmin.phillips@towerhamlets.gov.uk">jasmin.phillips@towerhamlets.gov.uk</a> <a href="http://www.towerhamlets.gov.uk">www.towerhamlets.gov.uk</a></p>	



3	<b>Training</b> Do all staff & homestays/sub-contractors have awareness of key Prevent points: i) what it is and its aim ii) how to recognise vulnerable students who might be drawn to extremism iii) know core British values iv) be ready to exploit opportunities to exemplify them v) be ready use them to challenge extremist statements vi) know to report when they have concerns about anyone, and who to report to?	The Academic Quality Coordinator completed online 'Prevent Duty' training. 'Prevent' is part of staff induction, so all DAL Team including contractors are subject to completing online "Prevent Duty" and also "Safeguarding" training. Records are kept in staff files. Accommodation providers and group leaders were also informed about the key prevent points.	The prevent officers need to make sure all staff are updated with workshops and information on key prevent points yearly.	Jan 2021
4	<b>Welfare support</b> Does the provider have sufficient welfare support, especially for vulnerable students? Can the provider direct students to moderate places of worship if requested?	Yes, the Academy has a Welfare and Safeguarding Officer. Moderate places of worship are known to the Academy and advice is available to students on request.		
5	<b>Prayer and faith facilities</b> Are these well managed and being used appropriately?	Yes, the Academy allows the use of empty classrooms for a designated prayer room if required. This is managed by the Welfare and Safeguarding Officers and always used appropriately.		
6	<b>Safeguarding</b> Does the provider have policies (or included in safeguarding policy) to protect its students from access to extremist materials, e.g. a) <b>Online safety</b> Reference to Prevent duty / filters to restrict extremist websites / info to and contract with staff & students about	These policies/procedures have been included in the Academy's Procedure 5.2 on Pastoral care and CIAG point 7 on Safeguarding Procedures and are being implemented.  In addition to the internal policies of the Academy, external resources and regulations are also closely followed for full safety of all such as:		





	<p>accessing extremist material on personal IT / response for failing to follow policy</p> <p>b) <b>Materials displayed</b> Student handouts/notices posted on campus, especially those not in English to be checked?</p> <p>c) <b>Outside speakers / sub-lets</b> Are outside users of the campus / facilities appropriate? What is procedure for checking?</p>	<p><a href="https://www.saferinternet.org.uk/">https://www.saferinternet.org.uk/</a></p> <p>Keeping Children Safe in Education - For Schools and Colleges (Last updated January 2021 to reflect Brexit and Covid).</p>		
7	<p><b>Campus security</b> How are entrances / exits managed safely for access by non-students/staff? Are staff/students easily identified? What additional security measures are in place?</p>	<p>The only entrance to the premises is monitored at all times by the receptionist. All visitors are required to sign in and out. The Academy maintains biometric attendance data for staff and English students. The Academy has CCTV. The Academy has emergency fire exits.</p>		
8	<p><b>Serious incident management</b> Is there an Emergency Action Plan (EAP) showing how to respond in the event of a serious incident on or off campus?</p>	<p>Yes</p>		
9	<p><b>Polices and procedures</b> Are above points covered in existing safeguarding procedure? Do procedures include record keeping procedures (e.g. training / concerns / referrals to outside agencies?)</p>	<p>All key points are included in the Safeguarding procedure. The relevant policy was last updated in June 2021, which now includes further guidance on Honour-Based Abuse.</p>		<p>Jan 2021</p>