



BIMM
INSTITUTE

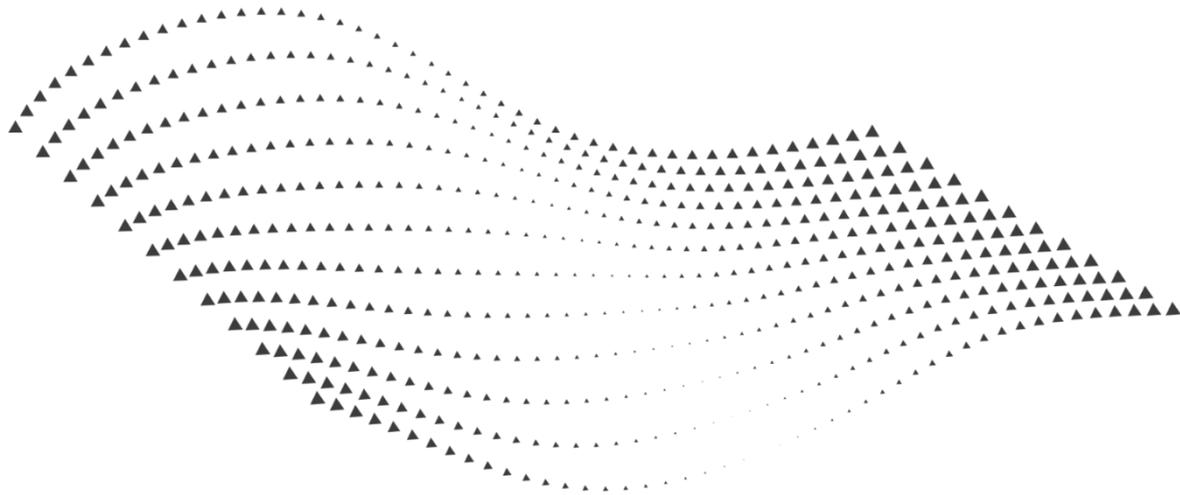


INSTITUTE FOR
CONTEMPORARY
THEATRE



PERFORMERS
COLLEGE

Prevent Duty Policy



Last approved: September 2020

Approved by: BIMM Limited Board

Next review due: September 2024



1. Introduction

- 1.1 The Counter Terrorism & Security Act 2015 places a duty on all Relevant Higher Education Bodies (RHEB) to have due regard to the need to prevent people from being drawn into terrorism. This legislation is given specific statutory force through the Prevent Duty guidance for Higher Education (HE) institutions in England and Wales, referred to as the 'Prevent Duty'.
- 1.2 The underlying considerations adopted by the Institute in implementing the Prevent Duty are:
- a commitment to the safety and wellbeing of our staff and students and all who interact with the Institute, including not being victims of, or complicit with any activities linked to radicalisation.
 - upholding the legislative requirements and champion the spirit of academic freedom and freedom of speech within the law and with the appropriate obligations and responsibilities arising from such freedoms (see also section 1.5).
 - that the requirements described in this Policy are implemented in a proportionate and risk-based manner.
- 1.2 The legal definition of terrorism as defined in the Terrorism Act 2000 defines it as “the use or threat of action which involves serious damage to property; or endangers a person’s life; or creates a serious risk to the health and safety of the public or a section of the public; or is designed seriously to interfere with or disrupt 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, racial or ideological cause.”
- 1.3 Terrorism may take the form of extremist behaviour and acts. The statutory Prevent Duty Guidance defines extremism 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 and calls for the death of members of our armed forces, whether in this country or overseas”.
- 1.5 In accordance with this definition, the Institute considers that extremist ideologies, and those who express them, undermine the principles of freedom of speech and academic freedom. Freedom of speech and academic freedom, as separate but interrelated liberties, are key features of student life and the Institute will ensure that a separate Statement on Academic Freedom and Freedom of Speech sets out the legal obligations, rights and responsibilities related to preserving this freedom.

2. Scope and Application of this Policy

- 2.1 The purpose of this Policy is to provide high-level information on the requirements of the Prevent Duty, the Institute’s approach to complying with the duty, and how the arrangements required under the Duty are being satisfied. Further details on specific arrangements in place are provided in separate policies and procedures (as noted throughout).
- 2.2 Specifically, this Policy applies to all BIMM Limited Colleges in England (BIMM Institute, ICTheatre and Performers’ College – henceforth referred to as ‘the Institute’), regardless of awarding body. It also applies to any location in England where a BIMM Award is delivered by a Partner.
- 2.3 The Prevent duty requirement does not apply to activities undertaken by the Institute in other countries, although it would be expected that any activities directly related to the Institute overseas would not be at odds with this Policy. To this end, all Prevent-related processes and procedures apply to all teaching locations and countries.

2 Arrangements to Deliver the Prevent Duty

3.1 Governance

3.1.1 BIMM Limited Board has a statutory responsibility to ensure the Institute satisfies the requirements of the Prevent Duty, with leadership and implementation delegated to the Academic Director & Provost (as Prevent Lead) for Prevent-related matters.

3.1.2 This Policy and its associated procedures are kept under review by the Institute's Quality Assurance & Compliance Committee (QACC) on behalf of the Academic Board, with ultimate responsibility for ensuring compliance with the Prevent Duty resting with the BIMM Limited Board.

3.2 Risk Assessment & Action Plan

3.2.1 The Institute continually assesses where and how its students might be at risk of being drawn into terrorism. The Institute manages risk by looking at institutional policies regarding its Colleges and student welfare, including equality and diversity and the safety and welfare of students and staff. The risk assessment also assesses the physical management of the Institute's estates, as well as policies and procedures for events held by staff, students or visitors and relationships with external bodies and community groups who may use premises, or work in partnership with the institution.

3.2.2 The Risk Assessment is kept under review by QACC and reviewed annually, reported to Academic Board and the BIMM Limited Board to ensure relevance prior to the Institute's annual Prevent Return to the OfS. This includes proposed actions which the Institute will take to mitigate these risks.

3.3 External and Visiting Speakers and Events

3.3.1 The Institute has robust procedures for approving External and Visiting Speakers and Events. The External Guests Approval Procedure sets out the arrangements for managing in-College events, and the use of premises. The procedure is set within the context of the statutory responsibility of the Institute to secure freedom of speech.

3.3.2 A risk-based approach to the assessment of events will be taken and this may require modification of adjustments to the content of or arrangements for events to mitigate risks in respect of the Prevent Duty. Whilst, in exceptional circumstances only, the right is reserved by the Institute to prohibit events where speakers promote or seek to incite hatred of, or violence against others. For full details, please refer to the External Guests Approval Procedure (Appendix 1).

3.4 Staff Training

3.4.1 The Institute will develop and make accessible training materials available to academic and professional services staff outlining the requirements of the Prevent Duty, including guidance and support provided at a national level to support the delivery of training within RHEBs. Training will also be delivered to appropriate staff to aid awareness of the Prevent Duty and its requirements, the arrangements that the Institute has in place to seek to prevent staff or students from being drawn into terrorism or victims of it. This will include training appropriate members of staff to understand the factors that make people support terrorist ideologies or engage in terrorist-related activity, and recognise vulnerability to being drawn into terrorism, and be aware of what action to take in response.

3.5 IT Networks

3.5.1 The Institute is currently reviewing its existing web-filtering mechanisms to ensure that its IT networks or equipment cannot be used by staff or students to access, support, promote or facilitate harmful content, including extremism related material, unless this

is for teaching and research purposes as approved by the Institute. The communication of policy on this matter will be covered in the Institute's IT Usage Policy.

3.6 Social Media

3.6.1 The Institute has a statutory obligation under the Prevent Duty to ensure that social media is not used to promote extremist material or activities which may place people at risk of being drawn into terrorism; therefore its social media channels are monitored regularly, and action will be taken to address any misuse of social media which is in breach of this policy. See also the Institute's [Student Social Media Policy](#) (Staff Policy – see People HR).

3.7 Student Engagement & the Students' Association

3.7.1 The Institute is committed to engaging with its students in relation to Prevent Duty requirements. The BIMM Students Association (BSA) is still evolving and, therefore, the Institute will commit to working with BSA in this regard.

3.8 Safeguarding & Reporting

3.8.1 The implementation of the Prevent Duty is not to challenge or re-shape the current relationship between staff and students, or between any other stakeholders who make up the extended Institute community. Instead, the focus is that, in the rare event that a member of our community – be it a staff member, student, or anyone else connected with the Institute – has a serious concern that someone else in our community is potentially being drawn into violent extremism or terrorism, they know where to seek advice and what to do with that concern. Information in what to do in these cases can be found in the Institute's [Safeguarding Policy](#).

6 Statutory Responsibilities

6.1 The Office for Students (OfS) is the principal regulator of the Institute and has established a [monitoring framework](#) to assess compliance of all RHEBs with the Prevent Duty. The Institute has a legal duty to provide reports and evidence of its compliance with the Prevent Duty to OfS, including serious issues which arise related to the Institute's Prevent responsibilities. The OfS may at any point appoint an appropriate body to assess the Institute's compliance with the Prevent Duty.

6.2 The Institute has a responsibility to notify the OfS of any significant changes of circumstance affecting its Prevent responsibilities (such as a change in Prevent Lead or changes to core policies), or of any Prevent-related incidents (if applicable).

6.3 The Institute must submit an Annual Return, containing an Accountability Statement, to the Office for Students (OfS) in December of each year. This includes the total number of External Guests, via scrutiny by QACC each semester. A final statement, containing full data for the previous Academic Year, is submitted to the Semester 1 meeting of Academic Board.

Appendix 1: External Guests Approval Procedure

1 Applicability

- 1.1 *Events and Masterclasses:* this Policy refers to all events that are held by the BIMM Group that involve an External Speaker/Masterclass Leader/Guest Lecturer (henceforth referred to as “**External Guests**”). It applies to all Colleges in the BIMM Group including BIMM Institute, the Institute of Contemporary Theatre (ICTheatre) and Performers’ College (collectively referred to as “the Institute”) – regardless of awarding body. It also applies to any location where a BIMM Limited Award is delivered, including Screen and Film School Brighton.

2 Scope

- 2.1 *Events and Masterclasses:* this procedure applies to all events that are held by the BIMM Group that involve an **External Guest**.
- 2.2 *Guest Lecturers:* all scheduled lectures where there is a Guest Lecturer must go through the procedure for approving the Guest Lecturer as outlined below.
- 2.3 *Off-site events:* this procedure also covers off-site (external) events.

3 Validity

- 3.1 The approval period of any individual as an External Guest via the External Guest Procedure will be for 6 months, or the end of the Academic Year, whichever is sooner. Should an External Guest return to deliver a Masterclass / Event / attend a lecture outside of this period, they will again be required to be processed via the External Guests Procedure.

4 Events Involving an External Guest

- 4.1 Those wishing to organise an event (the “event organisers”) must provide specific information to the College Events & Guests Team as outlined in **Section 1 of the External Guests Approval Form** of this procedure (Appendix 2).
- 4.2 It will be made clear in the terms and conditions for bookings that any failure to disclose full event and/or speaker details may result in an event/booking being cancelled.
- 4.3 The College Principal will consider any information about External Guests (including their online websites / social media pages) and undertake a risk assessment. Where there is any risk identified against the Prevent Duty or that there might be any disorder or other issue with the booking, this should be referred to the BIMM Group Prevent Lead. The College Principal may also decide, at this stage not to progress with this individual.
- 4.5 Once the above information is submitted to the College Events & Guests Team, it will be checked by the College **Head of Events & Guests**, who will undertake checks as appropriate for key issues relating to equality and diversity or of a political nature. Where any issues are identified which might be considered a risk, these should be referred by the College Principal to the Academic Director & Provost who, as Prevent Duty Lead, will make any final decisions on such External Guests.

5 Events booked by external organisations



- 5.1 An external individual, or organisation, who wishes to book a room at a BIMM College must provide the information outlined in **Section 1 of the External Guests Approval Form** (Appendix 2) to the College Events & Guests Team.
- 5.2 On receipt of the information, an external organisation's website should be reviewed by the College Events & Guests Team to ensure that it does not contain any inappropriate content. A Google search should also be undertaken and the first three pages of results (if any results are found) should be reviewed.
- 5.3 Where there is to be an external speaker the above process should also be followed for the external speaker.
- 5.4 Where there is any content that may be considered inappropriate this should be referred to the College Principal in the first instance.
- 5.5 The College Principal will review the content of the website as well as any information about external speakers/organisations and undertake a risk assessment. Where there is any risk identified against the Prevent Duty or that there might be any disorder or other issue with the booking, this should be referred to the Academic Director & Provost who will convene the BIMM Group Prevent Duty Committee.
- 5.6 It will be made clear in the terms and conditions for bookings that any failure to disclose full event and/or speaker details may result in an event/booking being cancelled. The terms and conditions of bookings will also make it clear that the BIMM Group must be informed of any changes to an event and that these will need to be considered by the process outlined above.

6 Issues referred to the Prevent Lead

- 6.1 Any issues which arise from due diligence (concerning either an individual or an organisation) will be formally considered by the BIMM Group Prevent Lead. The Prevent Lead will conduct a short investigation into the proposed External Guest and the event that takes into consideration the need to maintain order within the College and also the Prevent Duty.
- 6.2 In making recommendations the Prevent Lead will assess risk based on the potential for:
 - any decision to limit Freedom of Speech as per the 1986 Education Act;
 - the event going ahead to cause the BIMM Group to be in breach of its Equal Opportunities & Diversity Policy;
 - the event going ahead to cause the BIMM Group to fail in its wider legal duties;
 - the event going ahead to cause reputational risk to the BIMM Group;
 - the speaker's presence on campus to cause fear or alarm to members of the College and/or the wider BIMM Group;
 - the speaker's presence on campus to give rise to breach of peace;
 - the event to breach the Prevent Duty.
- 6.3 The Prevent Lead may make one of the following recommendations, based on the risks presented, to:
 - **not permit** the event to go ahead;
 - **permit** the event to go ahead unrestricted;
 - permit the event to go ahead **provided that regulatory steps are taken**, designed to reduce the risk.
- 6.4 Steps designed to reduce the risk may include the requirement that:
 - the event is filmed;

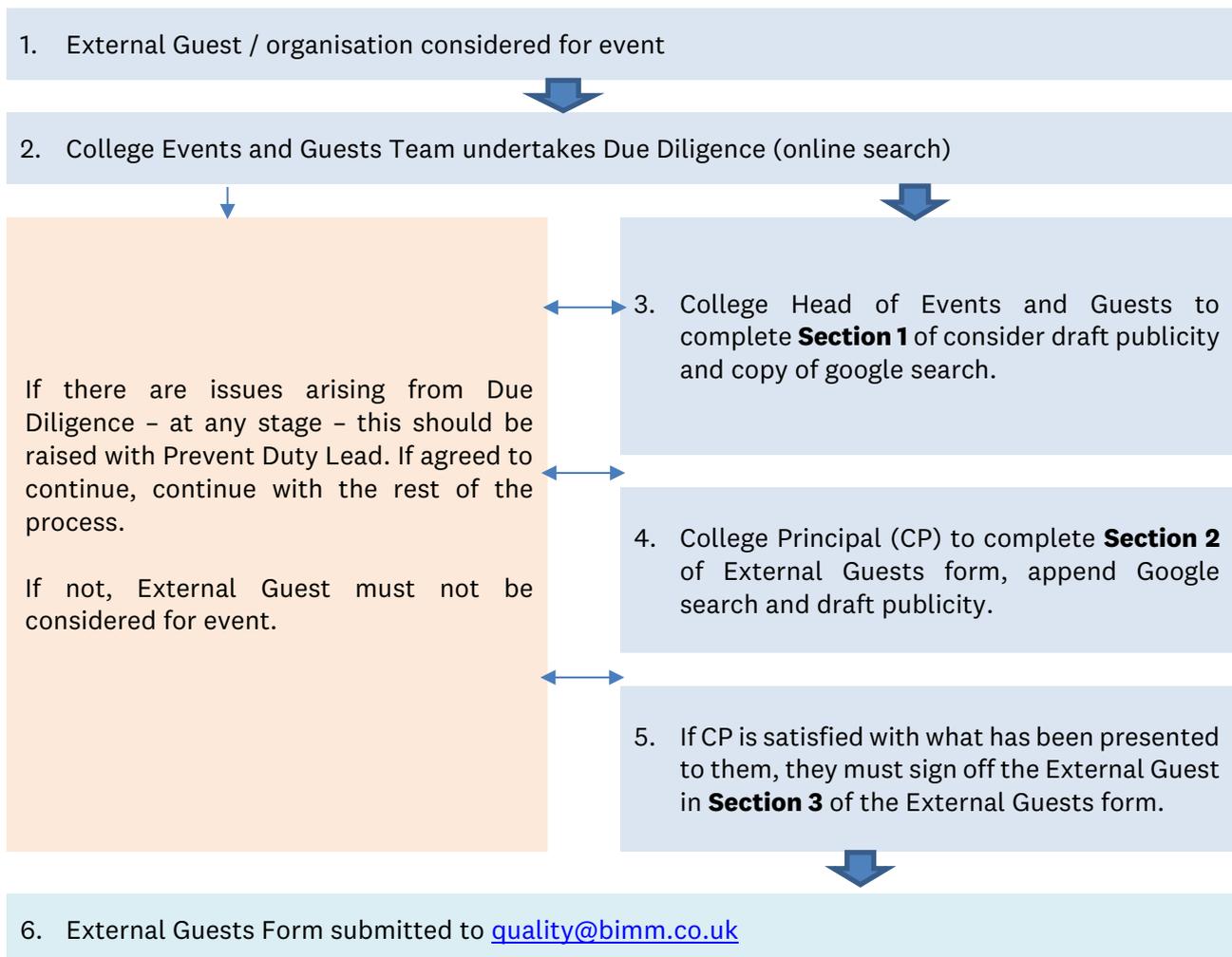
- the event is stewarded or subject to additional security on the door;
- an event promoting a particular view includes an opportunity to debate or challenge that view;
- the event is ticketed and that the attendees are approved in advance;
- a copy of any speech to be delivered by the External Speaker is submitted to the Prevent Lead in advance of the event.

7 **External Guest Data reporting**

- 7.1 The quality team will keep a record of all speakers / external events - therefore, it is important that all speaker data is kept up to date and all forms sent to quality@bimm.co.uk
- 7.2 The speaker data for all Colleges will be reported to QACC each Semester. Therefore, the Secretary to QACC will request headline data 3 weeks prior to each meeting. The year-end data for the previous session will be reported to the Semester 1 meeting of Academic Board, annually.

8. **External Guests Approval Procedure – Summary Chart**

The following flowchart summarises the procedure – these principles apply to both BIMM-organised event including an External Guest (including Guest Lecturers), as well as those organised externally.





Appendix 2: External Guests Approval Form

Section 1: Proposal of an External Guest

This form must be used to propose all External Speakers, Masterclass Leaders, or Guest Lecturers (External Guests) before the proposed event is scheduled to take place. Where there is an event that other staff, students and/or members of the public are invited to attend, this should additionally be booked through the College Events Team. Please refer to the *External Guests Approval Procedure* before completing this form.

Draft publicity for the event should be considered at this stage.

		Comments
1.1	Name of Event Organiser <i>(For externals this should include the name of person/company the enquiry comes from, phone number and email/business address and website.)</i>	
1.2	Name of Speaker/Masterclass Leader/Guest Lecturer	
1.3	Date and Time of proposed event	
1.4	Location of event <i>(College, including room - if off-site including off-site location)</i>	
1.5	Speaker/Masterclass Leader/Guest Lecturer's organisation and role <i>(Including names of any External Guests and the organisation(s) to which they belong if applicable, together with any information on affiliations - specifically where they are political or religious)</i>	
1.6	Subject and purpose of the session <i>(Please provide as much information as possible)</i>	
1.7	Course and/or Module to which the lecture relates <i>(For Guest Lecturers only)</i>	
1.8	Anticipated number of attendees at event / guest lecture	
1.9	Is the event and/or speaker likely to attract media interest? <i>If so, please explain why</i>	
1.10	Will the event be for BIMM College students and staff only, or will it be open to the public?	



Section 2: Approval of an External Guest

Following completion of Section 1, this section should be completed by the College Head of Events & Guests, who should ensure that a copy of the first two pages of the results of an online search and the draft publicity materials for the event are attached to the form. This should then be submitted to the appropriate College Principal.

			Comments
2.1	Will the Speaker/Masterclass Leader/Guest Lecturer be contributing to the curriculum?	Y/N	
2.2	If Yes, has the Guest Lecturer and subject been agreed with the Course Leader?	Y/N	
2.3	Has this Speaker/Masterclass Leader/Guest Lecturer been booked by the BIMM Group before? If yes, please give details.	Y/N	
2.4	If Yes, was this checklist previously completed? Did the event pass without any issue?	Y/N	
2.5	If this is the first time, is a member of staff familiar with the Speaker/Masterclass Leader/Guest Lecturer? Please give details.	Y/N	
1.6	Confirm that the results of the Google search on the Speaker/Masterclass Leader/Guest Lecturer are attached to the completed form for review by the College Principal.	Y/N	
1.7	Have any issues arisen that give cause for concern regarding the Speaker/Masterclass Leader/Guest Lecturer in relation to the BIMM Group's Prevent Duty? Where yes, what is your proposed mitigation?	Y/N	
1.8	Confirm that the draft publicity materials for the event are attached to the completed form for review by the College Principal.	Y	

**Section 3: Sign off***(to be completed by the College Principal)***Comments**

			Comments
3.1	Are you satisfied that the Speaker/Masterclass Leader/Guest Lecturer and subject is appropriate for the purpose of the session, based on his/her skills, knowledge, experience and reputation?	Y/N	
3.2	Confirm that you have checked the background of both the organisation and the External Speaker/Masterclass Leader/Guest Lecturer by reviewing the results of the Google search (attached to the form) to review any news stories etc.	Y/N	
3.3	Have any issues arisen regarding the External Speaker/Masterclass Leader/Guest Lecturer that give cause for concern in relation to the BIMM Group's Prevent Duty? Where Yes, what is your proposed mitigation?	Y/N	
3.4	Confirm that you have reviewed the draft publicity materials for the event.	Y/N	



Section 4: Confirmation of Approval of External Guest

To be completed by the College Head of Events & Guests and College Principal.

Confirmation that due diligence has been undertaken on the External Speaker/Masterclass Leader/Guest Lecturer (to be completed by the College Head of Events & Guests)

Signature:

Role and College:

Date:

Approval of the External Speaker/Masterclass Leader/Guest Lecturer (to be completed by the College Principal)

Signature:

College:

Date:

Where issues are identified, these should be referred by the College Principal to the Academic Director & Provost for consideration by the BIMM Group Prevent Duty Committee – if so, the following should be noted here:

Referral of the External Speaker/Masterclass Leader/Guest Lecturer to the Academic Director & Provost (to be completed by the College Principal):

Signature:

College:

Date referred to the Academic Director & Provost:

A copy of the completed form should also be sent to the Quality Assurance Team (quality@bimm.co.uk) for filing.