

St Padarn's Institute Prevent Policy



ATHROFA PADARN SANT
ST PADARN'S INSTITUTE

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Version	Date	Author	Notes on Revisions
1	November 2018	K Delderfield	
2	July 2019	K Delderfield	Minor amendments made to bring in line with other policies.

3	February 2020	K Delderfield	Updated reference to legislation on page 4, section 8.
4	August 2020	K Delderfield	Governance information updated; training clarified at HEFCW's request; organisational charts updated

St Padarn's Institute Prevent Policy

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2. Introduction

St Padarn's Institute is required under the Counter-Terrorism and Security Act 2015 to 'have due regard to the need to prevent people from being drawn into terrorism'. Under section 26, it must have regard to guidance issued by the Home Secretary. The *Prevent Duty Guidance for Higher Education Institutions in England and Wales* came into effect on 18 September 2015 following approval by Parliament. This document sets out how St Padarn's is complying with the Duty.

3. Scope

The Prevent Policy applies to all staff, learners, occasional contributors and volunteers of the Institute, wherever they may be located. All relevant parties have been consulted in the drawing up of these procedures.

4. Approach

St Padarn's takes seriously its responsibility to ensure the safety and wellbeing of learners, staff, volunteers and the wider community and commits to perform its duty to protect its community from being drawn into terrorism. The measures that it takes are set out in this document.

5. Leadership

The overall responsibility for the Institute is undertaken by the Trustees of the Representative Body of the Church in Wales (RB). The RB is responsible for holding and managing the assets of the Church in Wales and to provide support for the work of the Church as carried out through its Archbishop, Bishops, Clergy and Laity. It has a number of committees to govern different areas of its responsibilities, each made up of Trustees and people with expertise in that area. The governance for St Padarn's is delegated to an RB Committee, the Training, Formation and Ministerial Development Committee (TFMD Committee), which meets 3 times a year. There are at least 2 Trustees and 2 Bishops on the TFMD Committee, as well as representatives from the 6 Dioceses of the Church in Wales, and people with a background in Higher Education. The Committee is also attended by the Chief Executive of the RB, the Principal, the Head of Finance of the RB and the SPI Director of Operations. The minutes of the Committee are submitted to the Trustees of the RB. The leadership and management of the RB is delegated to its Chief Executive, who delegates the leadership and management of St Padarn's to its Principal. An executive board meeting is held monthly, comprising the Chief Executive of the RB, the Principal and Senior Leadership Team of St Padarn's, bringing in other key personnel such as the Head of Finance if appropriate. Due to the statutory nature of the Prevent duty, and the potential risk if the RB do not comply with it, the Prevent Policy and the Risk Assessment and Action Plan go through rigorous approval measures. These will first

be viewed by the executive board, before going to the TFMD Committee. The TFMD Committee will recommend them to the RB Audit and Risk Committee for their scrutiny. If the Audit and Risk Committee consider them satisfactory then they are recommended to the Trustees of the RB for final approval. Please see Appendix 1 for details, and Appendix 2 for Governance structure.

The practical outworking of the Prevent duty will be monitored at the monthly executive board meeting. The Director of Operations has been identified as the member of staff responsible for day to day compliance, in liaison with the regional Prevent coordinator and other key stake holders within and beyond the Institute. An annual report is made to Higher Education Funding Council Wales (HEFCW).

6. St Padarn's Programmes

St Padarn's delivers a full-time B.Th. programme in Theology for Discipleship, Ministry and Mission at its campus (around 35 learners) in Llandaff, and a part-time B.Th. programme through seminar days and facilitated learning groups throughout the Province (around 220 learners). These are accredited by University of Wales, Trinity St David. It offers full and part-time M.Th. Theology programme, and part-time M.Th. Chaplaincy courses in Llandaff (total around 50 learners). There are a number of other non-accredited programmes, which are predominately CPD programmes for Church in Wales ministers. There are approximately 350 learners in total. The average age of the Institute's learners is approximately 55 years old. Over 95% of its learners are part of the Church in Wales.

7. Risk Assessment and Action Plan

The Institute has carried out an assessment of the risk of individuals being drawn into terrorism. This risk assessment will be reviewed at least annually. Where risks are identified action will be considered that mitigate the impact/likelihood of that risk and included in the Prevent Action Plan.

8. Security Sensitive Research

The Institute recognises that the research and study of terrorism is valid, and learners and staff should be able to undertake this - subject to specific guidance - without risk of prejudice or fear of breaking the law. It is therefore acknowledged that certain staff (and exceptionally learners, particularly its Military Chaplains who may write on subjects such as the effects of terrorism) will have need to access material which is classed as security sensitive as part of their work. In such cases it is incumbent on the responsible member of academic staff to ensure via the Institute's normal ethical review processes that material is only accessed that is appropriate for the research or other work being carried out and that its use will not compromise the reputational security of the Institute. St Padarns has developed appropriate guidance for learners

and staff outlining specific sanctions in relation to the access of illegal or inappropriate terrorist material without ethical approval in its Research Ethics Policy. Under the 2015 Act learners are required to be reminded in writing that there are statutory penalties for visiting illegal sites. See [UK Oversight of security-sensitive research material in UK universities: guidance \(2019\)](#).

9. Staff Training

The Institute carries out regular training for staff and volunteers so that they can recognise those who are vulnerable to being drawn into terrorism and potential signs of radicalisation and are aware of what action to take. When a member of staff starts they will complete the online training recommended by the local Prevent Coordinator, <https://www.foundationonline.org.uk/course/index.php?categoryid=14>. Those in management will take *Prevent for Leaders and Managers*, other staff will take *Prevent for Practitioners*. Face to face training is delivered to Tutorial and campus-based staff every three years. This training will be carried out by an appropriately experienced person. Volunteers who have contact with learners will be made aware of the Prevent Duty in their induction training and will also be requested to undertake the on-line Prevent for Practitioners module. The Chief Executive and members of the TFMD Committee take the *Prevent for Governors and Board Members module*.

10. Pastoral Care

Pastoral Care is something the Institute takes seriously. Learners and staff at St Padarn's, Cardiff, have access to two independent chaplains, who are also accessible to staff. There is also a Tutor in Residence, who is an ordained minister, whose role it is to look after the welfare of full-time learners. Those learners who study in hubs around the dioceses have access to a tutor via phone, email or face to face, who will be available to give chaplaincy support. The facilitated learning groups are small (around 8 people) and so any pastoral issues are also quickly identified by the group facilitator. Learners are usually also each connected to a local church, and therefore to a community and pastoral support. St Padarn's is not just an educational establishment; part of its remit is to help people to develop holistically- emotionally and spiritually as well as educationally. This means there is a high degree of pastoral concern for all learners. When recruiting staff and volunteers, the ability to build relationships with learners is a high priority. A high staff to learner ratio, makes it possible to identify concerns more easily than might be the case in a larger establishment.

11. Information Technology

Staff operate under the RB Policies which are extremely robust and include an [Acceptable Use of the Internet Policy](#). In addition, there is in place a [St Padarn's IT Policy](#), which covers all use of IT by the Institute not covered by the RB policy. A sophisticated filtering system is in place and sites accessed on learners' own devices on the networks are monitored. The Principal and Chief Executive of the RB are notified immediately if something concerning is accessed. This will then be discussed by the Director of Operations, the Principal and the Chief Executive, and an appropriate course of action taken.

12. Communications

No material supporting terrorism or extremism will be allowed to be displayed or distributed and the Institute will seek to ensure that no communications contain or support terrorist material, or material likely to encourage terrorism or endorse extreme views. Any misuse of communications will be investigated immediately. At times there may be legitimate reasons to display material relating to terrorism as part of legitimate teaching and research activities, but any such use should be declared by staff, volunteers or learners and permission sought via written permission from the Principal.

13. External Speakers

In complying with the Prevent Duty the Institute will not provide a platform for any proscribed terrorist organisation or encourage terrorism in any way. Speakers are generally known to the Institute and are carefully vetted by the Principal to ensure they will uphold the values of the Institute. A form is submitted to the Principal outlining the reason for the speaker's invitation, their qualifications and background, subject matter and any sensitivities that the Institute should be aware of in their background or subject matter. Where there are sensitivities a speaker may still be invited, but the risk is managed by giving the speaker a careful briefing of the subject on which the Institute wishes them to speak, preparing the learners beforehand, ensuring a member of staff is in the session, and following up with learners subsequently. The Institute collects feedback on external speakers from staff and learners. Before a speaker is invited for any subsequent visits the feedback is checked for concerns.

14. Learner Involvement

The Institute works with the Learner Representatives to ensure provision of support to learners, including matters covered by this document. St Padarn's has a system of Learner Committees to ensure Learner engagement. Learners are consulted on all

aspects of St Padarn's, both formally and informally. There is learner representation on all formal meetings, including the TDMF Committee. Learner Executive members are invited to take part in Prevent training to ensure they understand – among other things – their obligations under the duty.

15. Information Sharing

The Institute is aware of the opportunities for informal and formal sharing of information with relevant authorities. These will be used when necessary and appropriate in order to prevent people from being drawn into terrorism. Information sharing will be undertaken in a manner which is consistent with GDPR.

16. Referrals, Roles and Responsibilities

All appropriate staff of St Padarn's are made aware of the Institute's responsibilities under the Prevent Duty and of the measures set out above to comply with it. Members of community who are concerned about a learner who might be at risk of being drawn into terrorism should report this to the St Padarn's Prevent lead, the Director of Operations, who will, where appropriate, refer it. Where there is a suspicion that emotional abuse may be taking place, and it is uncertain whether this is Prevent related or some other form, it should be reported to the Director of Operations, who is also the St. Padarn's Safeguarding Officer. The Director of Operations will make a decision on referral in consultation with the Safeguarding Manager of the RB. If the Director of Operations is unavailable the Principal should be contacted.

17. Related Policies and Procedures

The following policies and procedures are related to the Prevent Policy:

RB Computer Security and Misuse Policy

St Padarn's IT Policy

St Padarn's Research Ethics Policy

St Padarn's Disciplinary Policy

The Representative Body of the Church in Wales Disciplinary Policy

St Padarn's Code of Conduct

Data Protection Policy: <https://www.churchinwales.org.uk/privacy-notice/>

Safeguarding Policy:

<https://www.churchinwales.org.uk/structure/representative-body/publications/downloads/safeguarding-policy-2016/>

St Padarn's Security Sensitive Research Procedures

St Padarn's Request for Visiting Contributors

St Padarn's Whistleblowing Policy

18. Useful Contacts:

St Padarn's Prevent Lead: Kathryn Delderfield, Director of Operations

Tel: 029208388006 or 07388994732 Email: Kathryn.delderfield@stpadarns.ac.uk

St Padarn's Principal: Jeremy Duff

Tel: 07392195676 Email: Jeremy.duff@stpadarns.ac.uk

Wales Extremism and Counter Terrorism Unit link: Martyn Thomas

Email: Martyn.Thomas@south-wales.pnn.police.uk

Prevent Referrals:

Prevent@south-wales.pnn.police.uk

Further information:

<http://preventforfeandtraining.org.uk/>

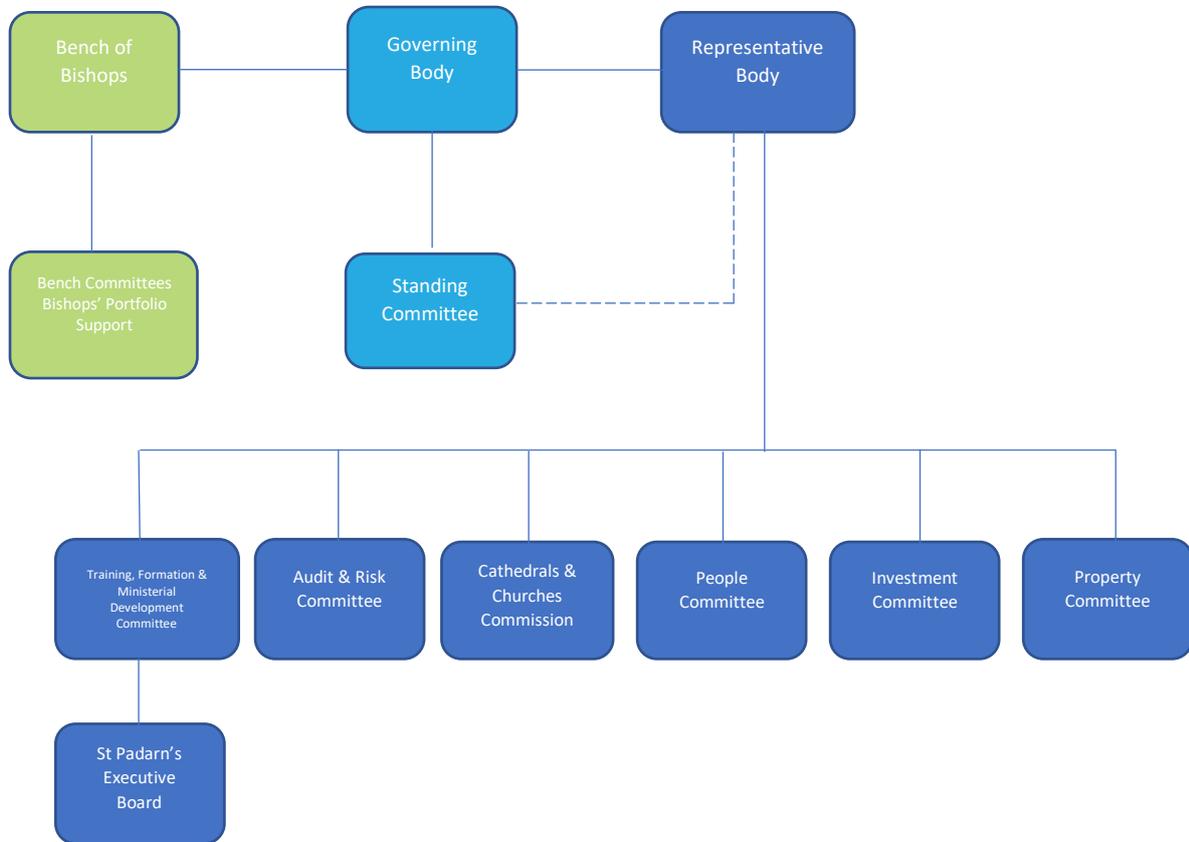
Appendix 1

Processes for Approval



Appendix 2

Governance Structure for the RB¹



¹ The committees in the light blue and green boxes form an advisory role to the Representative Body