Prevent Duty Guidance for Scotland: A Consultation

Colleges Scotland and College Development Network (CDN) are jointly responding to this consultation on behalf of members. We welcome the opportunity to respond to the consultation on the *Prevent* duty guidance for Scotland. We jointly agree that a collaborative approach is one that offers the best chance for success. Scotland's colleges have a strong record of collaboration and partnership that will underpin their performance of this duty. Our joint response to the consultation questions are given below.

16. Do you agree that the network of Vice Principals provides an appropriate forum for discussion of the Prevent duty on colleges and a mechanism for sharing and developing good practice?

The network comprises not just vice principals but a range of senior managers in colleges as the point of contact for CONTEST/*Prevent* activities. Each member of this group has been nominated by their college principal, with whom the prime responsibility rests for ensuring that the college has active engagement with the range of *Prevent* partners. Therefore this group does constitute an appropriate forum for the discussion of the *Prevent* duty on colleges.

In developing good practice in this area, the nominated CONTEST/*Prevent* manager will have to consider both risk ***assessment*** and risk ***management*** of the activities and engagements in support of *Prevent*. In practice the operational procedures will be devolved to a team – such as the college safeguarding co-ordinators – with senior managers having oversight to ensure that the *Prevent* duty is being effectively implemented and managed.

In terms of sharing good practice, there are currently no arrangements in place to ensure that this will take place. However, CDN has considerable experience in identifying and disseminating good practice in the college sector. It would therefore make good sense to have CDN facilitate a network for safeguarding in colleges to ensure that good practice can be recognised and shared.

17. Do you agree that the Regional Chairs and board of Colleges Scotland provide an additional appropriate means for discussion of the Prevent duty on colleges and a mechanism for sharing and developing good practice?

It is not clear what is intended in this question. If it is a reference to the board of Colleges Scotland (composed of regional chairs and principals) then the members of this board do require reassurance that there are procedures in place for colleges to risk assess and manage the prevention of terrorism and terrorist activity. Regional chairs will also have a significant interest in estate management and the implications that *Prevent* has for such management.

If the intention is a reference to regional college boards, then we would suggest that the monitoring of *Prevent* activities ought to be incorporated into a safeguarding agenda item for board consideration, and that induction training for Board members should incorporate a specific safeguarding agenda.

We do not see either of these groups performing a role in relation to sharing and developing good practice. As suggested in the response to Q16, this is within the remit of CDN. However, it will be important for the board of Colleges Scotland to be informed of developments in good practice in respect of the *Prevent* duty.

18. What role should Colleges Scotland and the Colleges Development Network have with regard to the Prevent duty?

Colleges Scotland can play a role in ensuring that colleges are fully informed regarding the implications and potential impact of the *Prevent* duty. In this role it will monitor and update its members on legislative and policy developments. As the voice of the sector, it will identify where additional costs will arise for colleges (such as staff training and development) and make the case for additional funding for the sector. Colleges Scotland will also liaise with Universities Scotland to identify shared issues in relation to *Prevent*.

CDN should play a key role in identifying and sharing good practice policy and procedures. It should support the organisation of safeguarding conferences; and work in partnership with the Scottish Government and the Scottish Preventing Violent Extremism Unit (SPVEU).

Specific activities for CDN in relation to *Prevent*:

- Highlighting for college staff the risk factors
- Raising awareness – how does *Prevent* strategy impact on college work
- Developing and promoting a self-assessment tool for the college workforce
- Developing evaluation procedures to help senior managers
- Working with others – external agencies (such as SPVEU, multi-agency *Prevent* and wider CONTEST governance groups).

Prevent activity sits naturally and intuitively within safeguarding procedures.

19. Do you agree that the Colleges Development Network are an appropriate network for sharing best practice with regard to delivery of Prevent?

We agree that they are an appropriate network; however CDN will work in partnership with relevant stakeholders to identify and share of best practice. This will require additional funding for CDN to ensure that this communication function is effective, relevant and up-to-date.

20. Are there other areas of activity, or examples of good practice, that should be covered in this guidance?

There are obvious connections to mental health issues and associated factors that may make people vulnerable to exploitation. Colleges create life changing opportunities for students but there is a limit to what can be achieved where there is a complex web of environmental and economic circumstances that may make people vulnerable to risk of terrorism or terrorist activity.

Also, there is the additional factor of supporting staff who may be involved in handling disclosures associated with the *Prevent* strategy. There will be a need for counselling and staff support if any incidents arise as part of the 'duty of care' provided by a college.

21. Do you agree that Education Scotland (supported by the Scottish Funding Council) should monitor compliance with this duty as part of their existing remit to inspect publically-funded further education colleges and independent training providers?

Education Scotland already has a focus on safeguarding as part of its review processes for colleges. However, to task Education Scotland with 'monitoring compliance' could be inconsistent with its published *Principles of Inspection and Review*. In its review activities Education Scotland would be looking for evidence that a college is maintaining its 'duty of care' requirements, of which *Prevent* would be an associated element. Education Scotland engages with students as part of its review processes and these dialogues may have a safeguarding focus. It would make better sense to position the monitoring of the *Prevent* duty in this wider context of review activities.

22. Are there other bodies that should be involved in monitoring compliance with this duty?

No. Colleges already have robust and rigorous processes in place to ensure a strong advancing equalities agenda. Safeguarding is well understood by college teaching and support staff and they receive appropriate training as part of induction programmes and ongoing training. As stated in our response to Q21, Education Scotland will review how a college provides for safeguarding and performs its *Prevent* duty as part of its existing processes. Colleges do not require an additional layer of monitoring in respect of *Prevent*.

23. Is there a role for SFC's Regional Outcome Agreement Managers in ensuring that the Prevent duty is included in targets described in Regional Outcome Agreements?

No. Regional Outcome Agreements (ROA) generally focus on **outcomes**. An ROA details the contexts in which college provision will be delivered, such as the college's commitment to its duty of care for students, but these are not in the form of targets. It is unlikely that engaging with *Prevent* partners and fulfilling the *Prevent* duty would form part of the ROA targets.

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Colleges Scotland/College Development Network