

EDA COLLEGE



PREVENT POLICY AND FREEDOM OF SPEECH¹

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¹ Code of Conduct and Guidance on Freedom of Speech is given in Annexure 5 of this document.

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Prevent Policy

1. Scope of Policy

1.1 This Prevent policy is applicable to all stakeholders of EDA College, including students, teaching and non-teaching staff, service providers, visitors, contractors, external speakers and other people associated with the teaching, learning, assessment, administration and whoever supports the work/services in the college.

2. Introduction

2.1 As a Relevant Higher Education Body (RHEB), EDA College is obliged to comply with the Prevent Duty laid down in the Law and HM Government's Guidance for higher education institutions in England and Wales. The College has produced this policy under the Revised Prevent Duty Guidance (the Guidance) for England and Wales (updated in April 2021), which is itself based upon Section 26 of the Counter-Terrorism and Security Act 2015 (the Act). The Act places a duty on specified authorities/bodies to have "due regard to the need to prevent people from being drawn into terrorism".

2.2 The Guidance assists EDA College to take measures to:

- Prevent people from being drawn into terrorism and ensure that they are given appropriate advice and support
- Work with sectors and institutions where there are risks of radicalisation that need to be addressed.

2.3 This policy will be used to cover all aspects of the Guidance for implementation of Government's Prevent Strategy (<https://www.gov.uk/government/publications/prevent-duty-guidance>). The policy sets out the roles and procedures for all responsible persons for compliance of the Prevent Duty in order to make its execution comprehensive and purposefully practical.

3. Prevent as part of Contest Strategy

3.1 Contest is a broader concept used by the Government's overall counter-terrorism strategy and it includes four elements; **Pursue, Protect, Prepare and Prevent**. As a part of the Contest Strategy, the Prevent duty aims to:

- Respond to ideological challenge of terrorism and the threat faced by the UK from those who promote it
- Prevent people from being drawn into terrorism and ensure they are given appropriate advice and support
- Work with a wide range of sectors (including education, criminal justice, faith, charities, the internet and health) where there are risks of radicalisation which need to be addressed.

4. The Policy

4.1 EDA College will work closely with internal stakeholders including students, teaching and non-teaching staff and with external bodies such as HEFCE, QAA, Local Authorities, BIS, the Police, the Regional Prevent Coordinator and other security services.

4.2 The College will ensure that its premises are not used as a platform for any activities which could be a source of encouragement of terrorism and support proscribed terrorist organisations. EDA College will develop mechanisms to assess and rate risks associated with any events planned on the College premises or that are affiliated with it. (See Annexure 1: Event Permission Form)

4.3 The College will evolve a mechanism to keep students and staff aware of the Prevent Duty requirements and methods of assessing the risk of any kind extremism, terrorism or related activities. In this regard, emails for awareness will be sent to all involved in the College; posters will be created and placed at various points on the premises to raise general awareness.

4.4 Students and staff will be required to sign a consent form to oblige them to inform the relevant Prevent Officer (Director of Studies/Programme Leader) and Prevent Administrator (Registry Lead) regarding any incident, discussion or signs of terrorism and extremism (See Annexure 2: Consent Form). Every student and staff member will use the mechanism for informing the College about extremist and radicalised views. Under this mechanism all students and staff will directly reporting any such incidents to the Prevent Officer, who will take all necessary steps to assess the risk and make it a part of action plan.

4.5 The College already has a policy for the use of IT equipment at the campus with specific reference to legal requirements. This will be further updated to include in it the elements of Prevent.

4.6 The Student Representation policy will be revised to include the elements of the Prevent Duty.

4.7 The Prevent Policy will be included in Staff and Student Handbooks.

4.8 The Prevent Duty risk analysis, action plan and its implementation will be included as an agenda point of different committees/boards at the College.

4.9 The policy will be published on the College website and will be reviewed periodically, normally annually, in response to any changes in Government Regulations and Guidance.

5. Procedures for Implementation

5.1 *Speakers and Events:* The conduct of public meetings and invitation to external speakers, either by the college staff or students, is subject to approval from the Principal at EDA College. The students and College staff must adhere to regulations as stated by the Prevent Duty when deciding about inviting guest speakers to the College. Similarly, internal or external events, both curricular and non-curricular, or external curricular must be approved by the Principal with clear directions pertaining to the Prevent Duty (See Annexure 1 Event Permission Form).

5.2 *Use of Internet:* The College IT team will further enhance the protective measures to suitable use of internet on the College campus. Special instructions will be displayed on Computer Laboratory walls to inform all IT users to comply with their Prevent Duty (See Annexure 3 Code of Practice for use of IT Facilities).

5.3 *Student Representatives' Responsibility:* Students Representation will be made more effective by including Prevent Duty elements in their handbook and providing briefings and training to identify and report any signs of radicalisation and extremism.

5.4 *Staff Responsibility:* Staff (both teaching and non-teaching) will be made responsible for prompt response to acts, words and movements of any radical nature to the Prevent Officer for making it the part of the action plan for implementation of the Prevent Duty. Staff shall be briefed and trained about the Prevent Duty through invitation to relevant College meetings. Special briefing and training sessions can also be arranged.

5.5 *Monthly Survey for Prevent Risk Assessment:* In order to implement the Prevent Duty on a regular and continuous basis, a Prevent Duty Questionnaire shall be constructed and a monthly survey shall be conducted for all staff members to complete to report any signs of radicalisation in the College (See Annexure 4 Prevent Duty Questionnaire).

5.6 *Prevent Risk Assessment Report (PRAP):* The Prevent Administrator shall produce a report on the basis of the monthly surveys concerning the Prevent Risk Assessment and shall submit the report to the Prevent Officer.

5.7 *Action Plan based PRAP:* PRAP will result in an Action Plan and it will be drafted with to achieve actions and outcomes in given time frame with clear indication of responsibilities and accountability. The Prevent Officer will then take any necessary action to report any serious incident to the relevant authorities and the Prevent Coordinator assigned to EDA College.

5.8 *General Staff / Student Consent of Informing about Prevent Risk:* The Prevent Administrator shall formulate a template of Consent Form for Students and Staff to inform any Prevent Duty related information to the College. The forms shall be filled in by staff and students and duly signed/dated (See Annexure 2).

5.9 *Code of Practice on Freedom of Speech:* The College publishes a code of practice on Freedom of Speech to implement the elements of Prevent Duty². The EDA Code of Practice and Guidance related to Freedom of Speech is given in Annexure 5.

² EDA College incorporates its Prevent monitoring alongside respecting the Office for Students' Regulatory Advice 24 and Higher Education (Freedom of Speech) Act 2023.

5.10 *Pastoral Support in Faith Related Activities:* There will be support for students and staff to practice their faith activities, such as prayers. However, there shall be a clear indication that these gatherings must be conducted within the premise of Prevent Guidance (use Posters on Prevent Duty in Faith Practice Room).

5.11 *Harassment, Sexual Misconduct, and Safeguarding:* EDA College is committed to fostering a safe, respectful, and inclusive environment for all students, staff, and stakeholders. In accordance with the Office for Students (OfS) Condition E6, the College has adopted a zero-tolerance approach to harassment and sexual misconduct and has implemented clear policies and procedures to prevent and address such behaviour.

5.12 *Zero Tolerance Policy:* EDA College does not tolerate any form of harassment, bullying, or sexual misconduct. This includes unwanted behaviour that violates a person's dignity or creates an intimidating, hostile, degrading, humiliating, or offensive environment.

5.13 *Staff-Student Relationships:* To protect students from potential conflicts of interest or abuse of power, the College prohibits intimate personal relationships between staff and students where a direct or indirect professional relationship exists. Any such relationships must be declared and will be managed in accordance with the College's Safeguarding Policy.

5.14 *Reporting and Support Mechanisms:* All students and staff are encouraged to report incidents of harassment or misconduct. The College provides:

- A confidential reporting process
- Access to trained safeguarding officers
- Support services including counselling and academic accommodations
- Clear timelines and procedures for investigation and resolution
- Policy Accessibility and Awareness
- The Harassment and Sexual Misconduct Policy is:
- Published on the College website and student/staff portals
- Included in student and staff handbooks
- Introduced during induction and training sessions

5.15 The Prevent Officer and the Prevent Administrator at EDA College will:

- Liaise with each other and the relevant monitoring bodies for any updates on Prevent Duty
- Attend any training sessions or conferences related to Prevent Duty
- Keep the Prevent Policy up to date

Annexure 1: Event Permission Form

EDA College

Event Permission Form

Event Name: _____

Venue: _____

Event Date: _____

Start Time: _____ Finish Time: _____

Note: Event organisers and those giving permission have responsibility to;

- a) Ensure the planned event adheres to the College's code of conduct
- b) Comply with the College Prevent Policy throughout the event
- c) Make participants aware of and comply with the College's Prevent Policy

Permission Requested by:

Name: _____ Role: _____

Signature: _____ Date: _____

Permission Granted/ Not Granted (circle the relevant)

Remarks: _____

Name: _____ Role: _____

Signature: _____ Date: _____

EDA College

Consent Form

(for declaring incidents likely to cause Radicalisation/Terrorism)

I _____ as a Student/member of Staff of EDA College, give my consent to declare any incident, verbal discussion, debate, views expressed by staff and/or student(s) that are likely to result any kind of radicalisation or terrorism, will bring to the notice of the College Prevent Officer (DOS/PL) or the College Prevent Administrator (Registry Lead) without any hesitation and delays.

Signature: _____

Full Name: _____

Role in the College _____

Date: _____

Annexure 3 Code of Practice for Use of ICT Facilities

1. Purpose

1.1 To provide a policy for the use of information computing technology facilities owned and provided by EDA College for staff, students and other stakeholders.

2. Scope, background and applicability

2.1 Scope

This Policy concerns all computer systems, network and WIFI facilities operated by EDA College, regardless of location, where responsibility for user management and control resides with members of the EDA College, or where it may be outsourced to third parties.

2.2 Background

This policy document has been developed to help ensure that EDA College's information computing technology, in its widest sense, is protected against unauthorised use and unauthorised access. In particular, the policy has been developed to help ensure protection against unauthorised access and modification to the College's various data systems and other ICT systems.

2.3 Applicability

This policy concerns:

- The use of EDA College owned ICT facilities, including information systems
- Collegenetwork facilities (wired and wireless) regardless of whether these are used through the connection of college owned equipment or through the connection of private equipment to college owned equipment.

This policy applies to:

- All full-time, part-time and temporary staff employed by, or working for or on behalf of EDA College
- Students studying at the College
- Contractors and consultants working for the College
- All other individuals or groups, including visitors, who have been granted access to the College's ICT facilities.

It is the responsibility of each person to whom this policy applies to fully adhere to its requirements.

3. Code of practice for the use of ICT facilities at EDA College

3.1 Conditions of use of EDA College's computer systems

You may use the College's ICT and WIFI facilities if you have been authorised and are:

- An employee of EDA College
- A student registered for a programme of the College
- A former member of staff

- An individual or a member of a group who has been permitted to use the College's ICT
- A visitor to the College.

Only the Principal may authorise individuals or groups to use and access the College's facilities.

3.2 Use of private equipment

Privately owned equipment of staff, students and other individuals or groups may only be connected to the College's Wi-Fi upon agreement of either the Principal or Vice-Principal of the College. The College accepts no responsibility for the effects that any such connection may have on the operability of privately owned devices, consequently all risks, however small, reside with the owner.

3.3 Laws and regulations

All use of the College's ICT facilities must be in full compliance with English law, and where appropriate, all other regulations which are applicable. You must not try to gain unauthorised access to any computer system anywhere in the College. This is commonly known as hacking and constitutes a criminal offence under The Computer Misuse Act 1990. In certain cases, such activities can also be contrary to other legislation, for example, The Terrorism Act 2000.

You must not do anything maliciously, negligently or recklessly which might cause any sort of harm or disruption to any computer system anywhere (worldwide), or to any of the programs or data on any system. In this context the word harm is taken to mean any kind of damage, and any kind of unauthorised access, denial of resources or any data alteration.

If you are reasonably requested to do so, you must justify your use of the College's ICT facilities and/or Wi-Fi facilities. You must explain (in confidence, if necessary) what you are doing, and how and why you are doing it. You must make any reasonable changes requested by senior staff and comply with any reasonable restrictions placed upon you.

You must comply with valid regulations covering the use of software and datasets, whether those regulations are made by law, by the producer or supplier of the software or datasets, by the College, or by any other legitimate authority. If you have any doubts, you must contact the Principal or Vice-Principal before using the College's ICT facilities.

The Data Protection Act 1998 regulates the use and storage of personal information (i.e. any information which identifies a living individual) on computing systems. It is your responsibility to ensure that your information and computer usage complies with this law. Failure to do so could result in criminal charges being brought against both you and the College.

Whilst every reasonable endeavor is made to ensure that the ICT facilities and Wi-Fi facilities are available as scheduled and function correctly, no liability whatsoever can be accepted by the College for any direct or consequential losses or delays as a result of any system malfunction.

3.4 Conditions applicable to all College ICT users

EDA College's ICT facilities must not generally be used for, or in connection with, the activities identified below, some of which could result in legal action or civil proceedings being mounted against an individual, the College, or both.

- a) Deliberately accessing, creating or transmitting any obscene or indecent images, data or other material, or any data capable of being resolved into obscene or indecent images or material, with the exception of data which is connected with college work or official research or other

professional activity, where the sender/recipient would expect to exchange such material with other users in a professional capacity;

- b) Creating, transmitting or accessing material which is designed or likely to cause offence, annoyance, inconvenience or needless anxiety to another
- c) Creating, transmitting or accessing material which runs the risk of drawing people in to, or towards, terrorism, except where it can be demonstrated that there is a legitimate academic interest
- d) Deliberately contributing to News Groups or web sites that advocate illegal activity
- e) Creating or transmitting defamatory material or material that is libelous of any other person's or company's reputation, products or services;
- f) Viewing, transmitting, copying, downloading or producing material, including (but not exhaustively) software, films, television programmes, music, electronic documents and books which infringes the copyright of another person, or organization
- g) Making offensive or derogatory remarks about staff, students or the College on interactive social and life-style websites such as Facebook
- h) Posting offensive, obscene or derogatory photographs, images, commentary or soundtracks on interactive social and life-style websites such as Facebook and YouTube
- i) Transmitting or producing material which breaches confidentiality undertakings
- j) Attempting to gain deliberate access to facilities or services which you are unauthorised to access;
- k) Deliberately undertaking activities that corrupt or destroy other users' data; disrupt the work of other users, or deny network resources to them; violate the privacy of other users; waste staff effort or networked resources
- l) Creating or transmitting unsolicited commercial or advertising material unless that material is part of a service to which recipients have chosen to subscribe
- m) Making commitments via email or the Internet on behalf of EDA College without full authority
- n) Undertaking any activities detrimental to the reputation or business interests of the College
- o) Initiating or participating in the sending of chain letters, 'junk mail', 'spamming' or other similar mailings.

Any user who inadvertently accesses an inappropriate Internet site must immediately close the session or return to the previous page.

Any member of staff who receives an inappropriate email message or e-mail content that appears to have been sent by a member of staff or student may wish to report the matter to the Vice-Principal or Principal.

3.5 Computer crime and misuse

The College expects users to use ICT facilities, and in particular email and the Internet, responsibly at all times. Suspected computer crime and misuse of the College's ICT facilities, including excessive personal use by staff, will be investigated by the Principal and action taken accordingly.

4. Monitoring use of the College's ICT facilities

Under The Telecommunications (Lawful Business Practice [LBP]) (Interception of Communications) Regulations 2000 (Statutory Instrument 2000 No.2699) EDA College reserves the rights to monitor users' activities to:

- Record evidence of official transactions
- Ensure compliance with regulatory or self-regulatory guidelines (including this Policy)
- Maintain effective operations of systems (for example, preventing viruses)
- Prevent or detecting criminal activity
- Prevent the unauthorised use of computer and telephone systems to ensure that the users do not breach College policies.

Under this regulation there is a requirement for employers to inform staff about such monitoring. The publishing of this Policy is one means of fulfilling that obligation.

Annexure 4: Prevent Duty Questionnaire (for Prevent Duty Risk Assessment)

EDA College Prevent Duty Risk Assessment Form (Questionnaire) (To be filled in by Prevent Administrator)		
Month:		
Date:		
Questions	Answers (Y/N)	Action Needed
Has every student signed the Consent Form for Prevent Duty?		
Has every member of staff signed the Consent Form for Prevent Duty?		
Has any staff member reported any signs of radicalisation in and out of the classrooms?		
Has any student reported any signs of radicalisation in and out of classroom?		
Did you see any signs of radicalisation or terrorism in and out of classrooms?		
Did any student and/or member of staff request any event arrangements in the College or under the College name?		
Was permission granted for any kind of event inside or outside the College?		

Annexure 5: Code of Practice & Guidance on Freedom of Speech

(In accordance with OfS Regulatory Advice 24)

1. Introduction

This document outlines the EDA College's commitment to upholding freedom of speech and academic freedom, as required by the Higher Education and Research Act (2017) and OfS regulatory framework. The guidance covers free speech under the Higher Education (Freedom of Speech) Act 2023.

At a glance;

- The Act protects free speech within the law. It does not protect unlawful speech. The Act requires the governing body of each provider, and constituent institutions, to take reasonably practicable steps to secure free speech within the law for students, staff and visiting speakers. It also requires them to maintain a free speech code of practice and to promote free speech and academic freedom (p4).
- "Within the law" means the laws of the state or made by courts. It does not include rules made by a provider or constituent institution through contracts or its own regulations or standards (although see step 3 on proportionate interference and e.g. para 127). Free speech includes lawful speech that may be offensive or hurtful to some. Speech that amounts to unlawful harassment or unlawful incitement to hatred or violence (for instance) is not protected (p10)
- Providers should not admit international students or visiting academics or enter into arrangements or programmes with foreign countries on the basis of funding arrangements or other criteria that have the effect of restricting their or other's academic freedom or freedom of speech. Practicable steps may include proactive checks, particularly where there are known risks relating to possible attempts to monitor, censor or intimidate students or staff. These may include translating official documentation and undertaking robust risk-based human rights due diligence before entering into such arrangements (p37)

2. Scope

It applies to all staff, students, visiting speakers, and external partners at EDA College.

3. Legal & Regulatory Framework

The institution must comply with:

- Higher Education (Freedom of Speech) Act 2023
- Higher Education and Research Act 2017 (OfS conditions)
- Equality Act 2010 (balancing free speech with protections against harassment)
- Prevent Duty (counter-terrorism and security obligations)
- Human Rights Act 1998 (Article 10: Freedom of Expression)

4. Definition of Freedom of Speech

Freedom of speech includes the right to express lawful views (even if controversial or unpopular), the right to debate and challenge ideas within the law. The students and staff enjoy academic freedom to research, teach, and question without censorship.

The limitation to this freedom is on that any speech that is unlawful (*e.g., hate speech, incitement to violence, harassment*) is not protected under this Act.

5. Institutional Responsibilities

The EDA College holds the responsibilities to:

- Promote free speech as a fundamental value.
- Protect staff, students, and speakers from unlawful silencing.
- Balance free speech with safeguarding duties (*e.g., Prevent, Equality Act, Higher Education Freedom of Speech Act*).
- Ensure external speakers and events are not unreasonably restricted.
- Provide clear procedures for reporting free speech concerns.

6. Procedures for Events & External Speakers

Area	Measures
Booking & Approval Process	<ul style="list-style-type: none">• Requests for external speakers must be submitted in advance.• Decisions should be content-neutral (not based on the speaker's views, unless unlawful).• A risk assessment may be required (<i>e.g., security, public order</i>).
Challenging Decisions	<ul style="list-style-type: none">• If a speaker is rejected, a clear appeals process must be available.• Decisions must be documented and justified.
Safe & Inclusive Environment	<ul style="list-style-type: none">• Events should allow for respectful debate without intimidation.• Protest is permitted but must not prevent speech from occurring

7. Handling Complaints & Disputes

In order to handle any complaints and disputes the college may appoint a Free Speech Champion and the complaints about complaints about free speech restrictions should be investigated fairly so that students and staff must not face any unjust consequences for their lawful expression on any issues or topic.

8. Training & Awareness

EDA College is obligated to train the staff and students on free speech and the policy related to freedom of speech is publicly accessible and the elements of such code of freedom of speech and guidance must be made a part of student/staff induction process.

9. Monitoring & Review

EDA College will review this code and guidance annually and monitor the compliance of it at all levels. In order to effectively implement the code of freedom of speech a report on any incidents of restrictions of freedom of speech must be reported formally (*e.g., speaker cancellations, protests ban etc.*).

10. Conclusion

The EDA Code of Conduct on Freedom of Speech ensures the college meets OfS regulatory expectations while fostering a culture of open debate, academic freedom, and lawful expression.