

Sotheby's INSTITUTE OF ART

PREVENT STRATEGY AND POLICY

Background

Legislation

1. Prevent became a statutory duty in 2015 for seven specified authorities under the [Counter-Terrorism and Security Act 2015](#) (the Act), and Higher Education was one of them. Section 26 of the Act places a duty on certain bodies to have “due regard to the need to prevent people from being drawn into terrorism”. The Act states that the authorities subject to the provisions must have regard to parliament-approved guidance when carrying out the duty, which is generally known as the “Prevent duty”. The duty applies to all Relevant Higher Education Bodies (RHEBs) and compliance is monitored by the OfS. The legal responsibility for compliance resides with the governing body/proprietor.
2. The Government has also developed a counterterrorism strategy, known as [CONTEST](#). The aim of CONTEST (an abbreviation of **COUNTER TERRORISM STRATEGY**) is to reduce the risk to the UK and its interests overseas from international terrorism so that people can go about their lives freely and with confidence.
3. The CONTEST strategy has 4 key strands of work that have a different role to play in tackling the threat from extremism:
 - Prevent** – to stop people becoming terrorists or supporting terrorism
 - Pursue** – to stop terrorist attacks
 - Protect** – to strengthen our protection against a terrorist attack
 - Prepare** – to mitigate the impact of a terrorist attack
4. [Prevent strategy](#) was issued in 2011; it contains three objectives:
 - tackle the ideological causes of terrorism
 - intervene early to support people susceptible to radicalisation
 - enable people who have already engaged in terrorism to disengage and rehabilitate
5. Prevent duty guidance for HE institutions in England and Wales was last updated in 2023 and can be found [here](#).

Definitions

6. The Prevent Strategy sets out the following definitions:
 - **Extremism** is vocal or active opposition to fundamental democratic values, including democracy, the rule of law, individual liberty and mutual respect and tolerance of

different faiths and beliefs. We also include in our definition of extremism calls for the death of members of our armed forces, whether in this country or overseas.¹

- **Radicalisation** refers to the process by which a person comes to support terrorism and forms of extremism leading to terrorism.
 - **Safeguarding** is the process of protecting vulnerable people, whether from crime, other forms of abuse or from being drawn into terrorism-related activity.
 - The UK Terrorism Act 2000 (TACT 2000) defines **terrorism** as an action that endangers or causes serious violence to a person/people; causes serious damage to property; or seriously interferes or disrupts 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 or ideological cause.
7. Radicalisation is usually a process, not an event. During this process, there may be opportunities to intervene in order to reduce the risk of the individual being attracted to extremist ideology and causes, and safeguard them from the risk of radicalisation. It is important to be able to recognise the factors that might contribute towards the radicalisation of an individual. Indeed, some of the factors that lead an individual to becoming radicalised are no different to those that might lead individuals towards involvement with other activity such as gangs, drugs, sexual exploitation, etc.

Vulnerability factors

8. There is no such thing as a “typical extremist”: those who become involved in extremist actions come from a range of backgrounds and experiences, and most individuals, even those who hold radical views, do not become involved in violent extremist activity.
9. Students may become susceptible to radicalisation through a range of social, personal and environmental factors - it is known that violent extremists exploit vulnerabilities in individuals to drive a wedge between them and their families and communities.
10. Below are some of the vulnerability factors that might contribute towards an individual becoming radicalised. This is not an exhaustive list and the presence of any of these factors does not necessarily mean that they will be involved in extremist activity. However, a combination of many of these factors may increase the vulnerability to extremist activity.
- **Identity crisis.** Distance from cultural/religious heritage and uncomfortable with their place in the society around them.
 - **Personal crisis.** Family tensions; sense of isolation; adolescence; low self-esteem; disassociating from existing friendship group and becoming involved with a new and different group of friends; searching for answers to questions about identity, faith and belonging.
 - **Personal circumstances.** Migration; local community tensions; events affecting country or region of origin; alienation from UK values; having a sense of grievance

¹ All definitions are from pages 107 – 108 of Prevent Strategy
https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/97976/prevent-strategy-review.pdf

that is triggered by personal experience of racism or discrimination or aspects of Government policy.

- **Unmet aspirations.** Perceptions of injustice; feeling of failure; rejection of civic life.
- **Criminality.** Experiences of imprisonment; poor resettlement/reintegration, previous involvement with criminal groups.

Specific risks faced by Sotheby's Institute of Art

11. While Sotheby's Institute of Art - London ("the Institute") acknowledges the current level of national threat at any point in time, the small size of the Institute means that its senior management has good general oversight of activities within the Institute. This, combined with the art-focused nature of the training, means that the judgement of the Institute is that the general risk of radicalisation is **manageable**.
12. The Institute recognises its duty of due regard under the Act. Through this policy and the associated actions in its action plan, including the provision of effective campaigns of awareness, training and formalising of appropriate mechanisms, the Institute intends to further reduce the likelihood of occurrence of Prevent-related incidents.
13. In order to further mitigate any risks Sotheby's Institute will:

Managing risks and responding to events

14. Ensure that the Institute monitors risks and is ready to deal appropriately with issues which arise. It will do this through:
 - Annual reviews of the Institute risk assessment and action plan in regard to the Prevent duty.
 - Understanding the nature of the threat from violent extremism and how this may impact directly or indirectly on the Institute.
 - Understanding and managing potential risks within the Institute and from external influences.
 - Responding appropriately to events in local, national or international news that may impact on students and communities.
 - Ensuring plans are in place to respond appropriately to an incident within the Institute.
 - Nominating a member of staff to be the Prevent Lead who will oversee the Institute's implementation of the Prevent duty and to be point of contact for all concerns related to the Prevent duty. This member of staff will keep regular contact with the local 'Prevent coordinator'.
 - Developing effective ICT security and responsible user policies.

Teaching and Learning

15. Provide a curriculum which promotes knowledge, skills and understanding to build the resilience of students, by undermining extremist ideology, and enabling students to develop their own opinions. This will be achieved through:

- Naturally embedding equality, diversity and inclusion and community cohesion in the curriculum.
- Promoting wider skill development, such as social and emotional aspects of learning.
- A curriculum adapted to recognise local needs, challenge extremist narratives and promote loving respect of all.
- Encouraging active citizenship / participation, and enabling students to develop their own opinions.

Student Support

16. Ensure that students are able to access suitable support. This will be achieved through:
- Establishing strong and effective student support services through Personal Tutors, counselling and academic support.
 - Listening to what is happening in the Institute and the wider community.
 - Giving clear information to students and staff about how to access support in Institute and/or through community partners.
 - Supporting at risk students.

Staff training

17. Ensure that staff are confident to take preventative and responsive steps working with partner professionals, families and communities. Staff will be provided with annual training which will cover:
- What radicalisation means (it is defined in the general guidance as "the process by which a person comes to support terrorism and extremist ideologies associated with terrorist groups");
 - Why people may be drawn into terrorism;
 - How to recognise vulnerability to being drawn into terrorism;
 - What is meant by extremism (defined in the general guidance as "vocal or active opposition to fundamental democratic values, including democracy, the rule of law, individual liberty and mutual respect and tolerance of different faiths and beliefs") and the relationship between extremism and terrorism;
 - What measures are available to prevent people being drawn into terrorism and how to challenge the extremist ideology that can be associated with it;
 - How to obtain support for people who may be being exploited by radicalising influences and what action to take in response to people being drawn into terrorism, including when to make referrals to the Channel programme.

Sharing information

18. The Institute may need to share personal information about a student to ensure, for example, that a person at risk of radicalisation is given appropriate support.
19. Information sharing must be assessed on a case-by-case basis and is governed by legislation. To ensure the rights of individuals are fully protected, it is important that when considering sharing personal information, the Institute takes account of the following:

- *Necessity and proportionality*: personal information should only be shared where it is strictly necessary to the intended outcome and proportionate to it. Key to determining the necessity and proportionality of sharing information will be the professional judgement of the risks to an individual or the public.
 - *Consent*: wherever possible the consent of the person concerned should be obtained before sharing any information about them.
 - *Data Protection Act and the Common Law Duty of Confidentiality*: in engaging with non-public bodies, the specified authority should ensure that they are aware of their own responsibilities under the Data Protection Act.
20. There may be some circumstances where the Institute identifies someone who may already be engaged in illegal terrorist-related activity. People suspected of being involved in such activity should always be referred to the police.
21. When a member of staff has any concerns that a student may be at risk of radicalisation or involvement in terrorism, they should speak with the designated Prevent Lead for the Institute before sharing any information. The Institute's Prevent Lead may deem it necessary for the Institute to take legal advice before sharing information.
22. The Prevent Lead for the Institute and the single point of contact for all concerns will be the Head of Quality.

Key roles in relation to Prevent

23. Key roles in relation to Prevent within the internal structures of the Institute are:
- **Governing Body**: has overall responsibility for ensuring that the Institute discharges its Prevent duty; reviews and approves Prevent risk assessment and action plan annually; presents an annual monitoring report to the OfS.
 - **The Management Team**: has management oversight of the implementation of the Institute's Prevent risk assessment and action plan; ensures that appropriate policies, procedures and networks are in place within the Institute to enable the Prevent duty to be discharged; reviews and reports to the Governing Body on the discharging of the Prevent duty.
 - **Lead contact**: liaises with the DfE and OfS Prevent coordinators and any other appropriate external agencies as and when necessary. The main lead contact for Prevent Duty is Duncan Murray, Head of Quality (D.Murray@sothebysinstitute.com); alternative Prevent contact is Sandra Surblyte, Senior Officer Quality Assurance (s.surblyte@sothebysinstitute.com).
24. Additional contacts include the following:
- To report illegal information, pictures or videos found on the internet log on to www.gov.uk/report-terrorism.
 - To report concerns call the national Police Anti-Terrorist Hotline number: 0800 789 321

- If a crime is being committed or there is a threat to someone's life, call 999 immediately.

Other Institute policies relating to the Prevent duty

The following Institute policies and documents relate to the implementation of the Prevent duty:

- IT usage policy
- Statement of Principles of Academic Freedom
- Freedom of Speech Code of Practice

Title	Prevent Strategy and Policy
Date first implemented	April 2024
Approving body	Governing Body
Effective	From April 2024
Version	April 2024
Supersedes	N/A
Next review date	Spring 2027
Frequency of review	Every 3 years
Policy owner	Quality Team