1. **Introduction**

   UPIC is fully committed to providing a safe and secure environment for all students. As part of the Government's strategy to reduce terrorism and safeguard people from being drawn into terrorism in the UK, the Counter-Terrorism and Security Act 2015 introduced the statutory 'PREVENT' duty for a range of public and other bodies. As well as key expectations relevant to all sectors, the HE sector has a number of additional responsibilities to be taken into account. This Policy outlines how Navitas UPE and the College network seek to deliver our social, ethical and legal responsibilities to comply with the PREVENT Duty.

   The objectives of PREVENT are to:

   - Reduce the risk of radicalisation

   - Tackle the causes of radicalisation and respond to the ideological challenge of terrorism

   - Safeguard and support those most at risk of radicalisation through early intervention, identifying them and offering support

   - Enable those who have already engaged in terrorism to disengage and rehabilitate

   This policy relates to all staff, students, and visitors to all UPE buildings and those engaged in business on behalf of the Navitas UPE Colleges based in the UK.

2. **UK Policy Governance and Management of PREVENT duty**

   Delivery of the PREVENT duty is locally led, and driven by analysis of the threat in communities. Local authorities are among the most vital partners in our network. The PREVENT duty requires local authorities to establish or make use of existing multi-agency groups to assess the local picture, coordinate activity and to put in place arrangements to monitor the impact of safeguarding work. In priority areas where the risk of radicalisation is assessed as being highest, PREVENT coordinators employed by local authorities build partnerships in communities, oversee the delivery of local action plans to respond to the risk of radicalisation, and work with partners to embed safeguarding activity in statutory services including social care, health and education.

3. **Application to the Education Context**

   Protecting pupils and students from radicalisation is part of the wider safeguarding duties of teachers, tutors and academics. The PREVENT duty requires education providers to have clear policies in place to safeguard students and build their resilience to radicalisation underpinned by best practice pastoral care.

   In the HE sector, as a result of the introduction of the new OfS regulator, 2018-19 will be a transition

year for providers giving more time to respond to the revised monitoring arrangements.  UPE will be subject to the new arrangements should it register successfully with the OfS in 2019.

### 4. Navitas UPE Policy

#### 4.1 Alignment with Partner University

Individual Navitas Colleges may, with the agreement of their Partner University, come under the auspices of the Partner University policy on PREVENT.  In the case of the partnership between UPIC and the University of Plymouth, it has been agreed that the College will come under the University policy on PREVENT. In these cases the Colleges in question must adhere to the following:

- A copy of the PU policy must be lodged with the Chair of the Academic Registry
- The PU policy must be sufficiently aligned to the Navitas UPE policy stated within this NPR
- The College PREVENT lead must ensure and demonstrate active compliance with the Partner University PREVENT policy including an annual report on PREVENT to be submitted to Academic Registry

#### 4.2 General Principles

Outlined below are the general principles that underpin the UPE approach to PREVENT:

- Our PREVENT policy is aligned to the Navitas core values notably that we show respect by valuing and caring for people and the environment.

- A PREVENT lead will be identified and appointed at Executive Level and in each College. In UPIC the DASS has been delegated the task of PREVENT lead.  Overall accountability for PREVENT to rest at Executive Leadership Team level (COO).

- We seek to support vulnerable individuals within our College and wider UPE communities at an early stage.  This support will be in the form of a comprehensive student welfare support programme including the Students in Jeopardy programme, mentoring and actively including students and student representatives in PREVENT related conversations.

- Our approach is enacted within a safe and supportive environment. Unless there is a direct threat of physical harm to an individual, concerns should initially be directed towards the appropriate PREVENT leads either in the College or in the Executive who will then co-ordinate the response, as set out in para 4.2.

- Engagement and consultation with students on safeguarding issues including PREVENT is included as a standing item on Student Council/Forum meetings to share updates as appropriate.

- PREVENT duty is captured and reflected in relevant IT usage policy – see 4.4.

- The issue of PREVENT to be added to the Divisional risk register together with an action plan to be  reviewed regularly and subjected to monitoring and enforcement as set out in the legislation.

- Adequate initial and ongoing training on PREVENT to be provided to key staff to enable them to fulfil their function effectively.

- Summary PREVENT principles, process and procedures to be added to new staff and new

student induction materials and incorporated in staff and student handbooks.

- Colleges and Division to produce an action plan to identify PREVENT related risk, control and mitigation on a standardised template.

- Policies and procedures actively implemented, properly followed and applied as appropriate.

- PREVENT duty to be included as a standing item on the College Senior Management Team committee agenda under the broader safeguarding and student welfare theme. SMT to receive updates on PREVENT from the College Safeguarding Lead as appropriate.

### 4.3 Procedures

The following steps and escalation routes are taken by Navitas UPE in order to comply with our PREVENT obligations, in the event that particular concerns come to light or incidents manifest:

- Each College has in place effective referral channels on the emergence of any concerns or incidents around vulnerable individuals. Any member of staff, student or other individuals may identify concerns about a member of our community who appears vulnerable to the risk of being drawn into radicalisation, based on information received or behaviour reported or directly observed.

- The specific concern should be raised initially with the PREVENT Lead or in their absence a senior member of the College or Executive depending on location. The PREVENT lead must weigh up evidence received and act in the appropriate and responsible manner.

- The PREVENT lead may refer and share information with the Partner University and/or Local Authority in the first instance. Other stakeholders to be informed may include the Police and any other relevant stakeholder including the regional PREVENT DfE Further and Higher Education co-ordinators, depending on the circumstances of any given situation or case.

- Where there is an immediate concern where a person's physical wellbeing is under threat the correct referral process is to call 999 and then inform the PREVENT Lead at the earliest opportunity.

- All referrals are kept confidential and all personal information subject to the provisions of GDPR

### 4.4 Training

Training and awareness raising to be available on a tiered basis depending upon the member of staff's relationship with the PREVENT agenda, and tailored to meet the Navitas UPE specific operating context. However, all staff are provided with a briefing sheet issued from the Academic Registry to set out the basic provisions of PREVENT with particular reference to how to report a matter of concern. Training is typically provided by the Local Authority or Partner University and augmented with in-house CPD as necessary, using a mixture of face to face training and on-line content. Engagement with any relevant training shall be recorded by Navitas UPE HR services and all training will incorporate feedback and evaluation to inform further enhancement.

### 4.4 IT Acceptable Use Policy

UPE has in place a University IT Acceptable Use Policy which applies to all use of all IT facilities. This sets out a range of activities that would be of concern to us including issues that arise from the statutory duty under the Counter Terrorism and Security Act 2015. This includes the creation, download, storage, transmission or display of material that promotes or incites racial or religious

hatred, terrorist activities or hate crime; or instructional information about any illegal activities. UPE uses filtering as a means of restricting access to inappropriate content. This can include partial filtering whereby an IT user is shown a warning before opening potentially inappropriate content.

**4.5 External Speakers and Events/Freedom of Speech**

Colleges may with agreement come under the umbrella of the Partner University policy on freedom of speech or adhere to the Navitas UPE policy. In the case of the partnership between UPIC and the University of Plymouth, it has been agreed that the College will come under the University policy on Freedom of Speech. In either case, this policy must be documented in the corresponding CPR, effectively communicated to all staff, and complied with at all times.  In addition, the content will form part of the training package.

**4.6 Resources**

- Office for students https://www.officeforstudents.org.uk/advice-and-guidance/regulation/counter-terrorism-the-prevent-duty/

- Safe Campus Communities http://www.safecampuscommunities.ac.uk/

- Let's Talk about it https://www.ltai.info/

- http://www.safecampuscommunities.ac.uk/guidance/regional-coordinators

- Leadership Foundation for Higher Education

- Local Authority PREVENT URL address