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Key Related Documents:

Name	Location
Safeguarding Children and Vulnerable Adults	College website, policies
IT Acceptable Use Policy (Students)	College website, policies
I T Acceptable Use Policy (Staff)	College website, policies
External Speaker Policy	College website, policies
Freedom of Speech Policy	College website, policies

Background and Introduction

Navitas University Partnerships Europe (UPE) is fully committed to providing a safe and secure environment for all students. As part of the UK Government's strategy to reduce terrorism and safeguard people from being drawn into terrorism, the Counter-Terrorism and Security Act 2015 introduced the statutory **Prevent duty** for a range of public and regulated bodies. In 2015 the government appointed the Higher Education Funding Council for England (HEFCE) to monitor implementation of the duty across the higher education sector in England and this has since been formally delegated to the Office for Students (OfS). From September 2018 the OfS implemented the Prevent duty framework for higher education providers in England¹, whilst much of this framework is applicable across the UK there are some alternative arrangements in Wales² and Scotland³.

The OfS requires HE providers to comply with the Prevent duty, most notably by; assessing the risks associated with Prevent; having effective welfare support systems in place linking to local authorities; have systems for assessing and mitigating risks around external speakers and events; arrange ongoing training for relevant staff; have appropriate IT usage policies; and engage with students to ensure that there is awareness of policies concerning activities on campus.

The OfS Prevent duty framework makes reference to registered providers in a franchise arrangement, such as Navitas UPE whose network of pathway Colleges collaborate with each of its University Partners to share key responsibilities for ensuring Prevent arrangements are in place for its staff and students - outlined in section 1 of this document.

UK Policy and Application to the Education Context

Delivery of the Prevent duty is often locally led and driven by analysis of the threat in communities. DfE Further and Higher Education Regional Prevent Coordinators 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. The DfE Prevent coordinators also 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.

The objectives of the Prevent duty 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

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.

¹ <https://www.officeforstudents.org.uk/publications/prevent-duty-framework-for-monitoring-in-higher-education-in-england-2018-19-onwards/>

² <https://www.wlga.wales/counter-terrorism-and-prevent>

³ <https://www.gov.uk/government/publications/prevent-duty-guidance/revised-prevent-duty-guidance-for-scotland>

Navitas UPE Policy

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

The Policy outlines how Navitas UPE and our College network seek to deliver our social, ethical and legal responsibilities to comply with the Prevent duty.

Key Contacts:

- The College Prevent Lead is the Senior Manager Student Services – studentservices@pathway.brunel.ac.uk
- The Navitas UPE Executive Prevent Lead is **Craig McIlwain** - craig.mcilwain@navitas.com
- The University Partner Prevent Lead/Team is Head of Student Affairs & Case Work

Alignment with Partner University

Individual Navitas Colleges come under the auspices of the University Partner policy on Prevent.

Though the responsibility primarily rests with the University Partner, our Colleges take assurances and engage in two-way communication during the course of the year irrespective of whether an incident occurs.

The **University Partner** provides the following in relation to the Prevent duty including:

1. Safety measures for the physical estate of the University
2. Case handling of Prevent related incidents referred by the Navitas College
3. Liaison with external agencies and partners, and making referrals as needed for Navitas College students
4. Providing Prevent training to College staff
5. Accountability for annual Prevent accountability and data returns to the OfS

The **Navitas College** is responsible for:

1. Adhering to University Partner Prevent policy(s) and process, and any Navitas specific policies (including the Navitas Prevent policy, Safeguarding Children and Vulnerable Adults policy, IT Acceptable Use policy (Staff and Students), the External Speaker policy and the Freedom of Speech policy)
2. Liaising with the University Partner Prevent Lead: during an incident; throughout the academic year to receive information on relevant University policies and local area; and to take assurances from the University on delivery of Prevent duties for Navitas College students
3. To screen all College events as per the Navitas External Speaker Policy and Freedom of Speech policy
4. Locally reinforce Prevent in Colleges and liaise with the Navitas Executive Prevent Lead for all Prevent matters
5. Track completion of Prevent training for relevant staff including training updates for new staff and the cycle of refresher training

The **Navitas UK Governing Body** is responsible for:

1. Appointing an Executive Prevent Lead for Navitas UPE
2. Overall accountability for Navitas UPE and its regard for the Prevent duty

General Principles

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

- Our Prevent policy is designed to clarify the responsibilities of our University Partners and Navitas UPE and its Colleges.
- 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 Leadership Level within Navitas and a local supporting Lead within each College (College Prevent Lead) – see [Key Contacts](#) for details.
- Overall accountability for Prevent in Navitas UPE rests with the Navitas UK Governing Body.
- We seek to support vulnerable individuals within our Colleges and wider Navitas UPE communities at an early stage. This support will be in the form of a comprehensive student welfare support programme including the Student Compass 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 College Prevent Lead, University Partner Prevent Lead or Navitas UPE Executive Prevent Lead who will offer advice and support and coordinate an appropriate response.
- Engagement and consultation with students on safeguarding issues including Prevent is included at least annually as a standing item on Student Council/Forum meetings to share updates as appropriate.
- Prevent duty is captured and reflected in relevant IT acceptable usage policies – see section 5.
- The issue of Prevent together with an action plan are to be reviewed by the Navitas UPE Executive Prevent Lead and the Navitas UK Governing Body. Colleges will produce their own action plans or follow the University Partner's risk assessments and action plans to help identify Prevent related risk, control and mitigation locally.
- Adequate initial and ongoing training on Prevent is to be provided to key staff to enable them to fulfil their function effectively. Training is provided to all College student facing staff members facilitated by the University Partner or Local Authority.
- A summary of the Prevent principles, processes and procedures are added to new staff and new student induction materials and incorporated in staff and student handbooks.
- Policies and procedures are actively implemented, properly followed and applied as appropriate.
- The Prevent duty is to be included as a standing item on the College Senior Management Team (SMT) committee agenda under the broader safeguarding and student welfare theme. SMT will receive updates on Prevent from the College Prevent Lead as frequently as required.
- The College will liaise with the University Partner Prevent Lead/team during an incident; throughout the academic year to receive information on relevant University policies and local area; and to take assurances from the University on delivery of Prevent duties for Navitas College students. Furthermore, the College will provide a report to the University as often as the provider requests.
- Navitas UPE will have in place an External Speakers policy allowing a clear framework to ensure

external speakers and events held within the College are appropriately organised, managed and adhere to specific guidelines upholding the Navitas UPE code of conduct. The policy should operate collectively with the Freedom of Speech policy identifying applicable laws and Navitas expectations and requirements to Freedom of Speech.

Procedures

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

- 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. Each College has in place effective referral channels on the emergence of any concerns or incidents around vulnerable individuals.
- In the first instance a specific concern should be raised initially with the College Prevent Lead or in their absence the Navitas UPE Executive Prevent Lead. The College Prevent Lead/Navitas UPE Executive Prevent Lead must weigh up evidence received and act in the appropriate and responsible manner. The College Prevent Lead should consult the Navitas UPE Executive Prevent Lead as and when required. Conversely the Navitas UPE Executive Prevent Lead can take supporting guidance from the University Partner Prevent Lead/team.
- The College Prevent Lead/Navitas Executive Prevent Lead will refer and share information with the University Partner Prevent Lead/team who will then provide case handling of the incident thereafter. The College Prevent Lead should remain in close contact with the University Partner Prevent Lead/team to offer support as and when required. Other stakeholders to be informed by the University Partner may include the Police and any other relevant stakeholder including the regional DfE Prevent coordinators, depending on the circumstances of any given situation or case but this would be done in collaboration with the University Partner.
- 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 relevant Prevent Lead immediately thereafter.
- All referrals are kept confidential and all personal information subject to the provisions of the GDPR.

Training

Training and awareness raising is 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. Training is typically provided by the University Partner or Local Authority 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 the College and refreshed in accordance with the University Partner policy on Prevent training.

IT Acceptable Use Policy

Navitas UPE has in place an IT Acceptable Use Policy which applies to the use of all IT facilities and equipment. The policy applies to both staff and students and 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. Navitas 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.

The policy IT Acceptable Use policy can be found on the policies section of the College website.

External Speakers and Events/Freedom of Speech

Navitas UPE has in place an External Speaker policy and Freedom of Speech policy designed to guide students and staff and external speakers on the applicable laws and the principles that guide the application of each policy.

Navitas UPE encourage the use of open and honest discussion at the same time as ensuring that staff feel able to raise any concerns about issues that may lead to extremist views and those that give rise to the fundamentals of the Prevent duty.

The External Speaker policy and the Freedom of Speech policy can be found on the policies section of the College website.

Resources

Office for Students (OfS):

www.officeforstudents.org.uk/advice-and-guidance/regulation/counter-terrorism-the-prevent-duty/

The Prevent Duty in higher education (HE): training and guidance for practitioners:

www.safecampuscommunities.ac.uk/

Let's Talk About It

www.ltai.info/

Prevent duty toolkit for local authorities and partner agencies:

<https://www.gov.uk/government/publications/prevent-duty-toolkit-for-local-authorities-and-partner-agencies>

Channel Duty Guidance: Protecting people vulnerable to being drawn into terrorism

https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/964567/6.6271_HO_HMG_Channel_Duty_Guidance_v14_Web.pdf

Policy Review

This policy will be every two years by the Navitas UK Holdings Governing Body unless there are internal or legislative changes that necessitate an earlier review.

The Policy was last reviewed in October 2022 by the Governing Body.