Prevent Policy

Document

Document Name	Prevent Policy
Issue Date	September 2025
Policy Code and Version	M01c, version: 25_01
Document Audience	**College Students** and **Navitas Staff Members**
Document Owner	Navitas UPE Central Team
Policy Responsibility	College Director / Principal
Brief Description of Policy	The Policy outlines how Navitas UPE and its network of Colleges seek to deliver its social, ethical and legal responsibilities to comply with the Prevent duty.

Version Control

Date	Version	Summary of changes	Approver
April 2020	2020	• Policy implementation under OfS registration	Director of Learning and Teaching / Head of Compliance Services
October 2022	2022	• Update to template and titles	Director of Operations
March 2024	24_01	• A new Prevent Lead was added to the policy	Navitas UPE Academic Board
September 2025	25_01	• Key contacts brought to page 3 of policy • Purpose, Scope and Induction - information consolidated • Alignment with University Partner section expanded • General Principles and Engagement with the Prevent Duty section expanded to incorporate additional sections to highlight how the Prevent duty is being met • Confidentiality and Data Protection added • Procedure updated to include Donesafe reporting and moved to appendix (appendix A) • Further Information and Guidance / Resource section moved to appendix B and expanded	Navitas UPE Risk and Audit Committee

Related Documents

Name	Location
Safeguarding Children and Vulnerable Adults	College website, Staff Policy Hub
IT Acceptable Use Policy (Students)	College website, Staff Policy Hub
I T Acceptable Use Policy (Staff)	Staff Policy Hub
External Speaker Policy	College website, Staff Policy Hub
Freedom of Speech Code of Practice	College website, Staff Policy Hub
Student Support Policy	College website, Staff Policy Hub
Student Engagement Policy	College website, Staff Policy Hub
Student Disciplinary Policy	College website, Staff Policy Hub
Staff Disciplinary Procedure	Staff Intranet

Contents

Purpose and Scope 3

Introduction 3

Application to the Education Context 4

Alignment with the University Partner 5

General Principles and Engagement with the Prevent Duty 6

Assessing the Risks Associated with Prevent 6

Welfare Support Systems and Concern/Incident Reporting 6

External Speakers and Events, and Freedom of Speech 7

Training 7

IT Acceptable Use Policy 8

Engagement with Students and Staff 8

Confidentiality and Data Protection 9

Communication of the Policy 9

Policy Review 9

Appendix A - Procedures for Prevent Related Concerns or Incidents 10

Appendix B - Further Information and Guidance / Resource 12

Key Contacts:

The College will have a trained staff member who is responsible for Prevent related matters arising during the academic year. This includes first response support for Prevent referrals (Prevent related concerns/incidents). The College Prevent Lead details are listed below with the individual often having responsibilities for safeguarding and as such is likely to be the College Designated Safeguarding Lead or Safeguarding Officer.

If you have a Prevent related concern or incident, please contact the following person(s):

- Dr Christian Gerstner | College Prevent Lead
  Christian.gerstner@navitas.com

- Rachel Wilkinson | Navitas UPE Executive Prevent Lead
  rachel.wilkinson@navitas.com

- The University Partner Prevent Lead/Team
  Katy Laverty student.services@keele.ac.uk

Where there has been a reported Prevent related concern or incident the College Director / Principal, the Navitas UPE Executive Prevent Lead and HR Representative (where a staff member is involved in an incident) will be informed and may be invited to support in the actions and outcomes of any formal referral to the University Partner.

If you are concerned about the safety of an individual due to acts of Prevent related activity or are concerned about a direct threat of physical harm to an individual, please call the emergency services (Police) on 999.

Purpose and Scope

This policy applies to every College employee, student, service provider, client, customer, contractor and visitor when they are engaged in Navitas UPE related activity or at a facility operated by Navitas UPE.

The policy, and procedure, set out how Navitas University Partnerships Europe (Navitas UPE) and its network of Colleges seek to deliver its social, ethical and legal responsibilities to comply with the Prevent duty.

Introduction

Navitas 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.

The Prevent duty aims to safeguard people from becoming terrorists or supporting terrorism.

The Office for Students (OfS), the independent higher education regulator for England, works on behalf of the UK government to monitor what higher education providers do to prevent people being drawn into terrorism. From

September 2018 the OfS implemented the Prevent duty framework for higher education providers in England[1], whilst much of this framework is applicable across the UK there are some alternative arrangements in Wales[2] and Scotland[3].

The main objectives of the Prevent duty are to:

- reduce the risk of radicalisation
- tackle the ideological causes of terrorism and respond to the ideological challenge of terrorism
- intervene early to support people susceptible to radicalisation
- enable people who have already engaged in terrorism to disengage and rehabilitate

The regulating framework requires higher education providers, including Navitas and its network of Colleges, to comply with the Prevent duty, most notably by:

- assessing the risks associated with Prevent and draw up a plan to mitigate these risks
- having effective welfare support systems, linking to Department for Education (DfE) Prevent Coordinators, local authorities or the police where necessary
- having systems in place for assessing and mitigating risks around external speakers and events on campus, while maintaining the existing duty to promote freedom of speech and academic freedom
- arranging ongoing Prevent training for relevant staff
- having an IT usage policy, and where appropriate a research policy, which covers the Prevent duty
- engaging with students and ensure that students' unions and societies are aware of policies concerning activities on campus.

To note: The OfS Prevent duty framework makes reference to registered providers in a franchise arrangement, such as Navitas UPE, whose network of Colleges collaborate with each of its University Partners to share key responsibilities for ensuring Prevent monitoring arrangements are in place for its staff and students.

This document will outline how Navitas UPE and its network of Colleges ensure the Prevent duty is being met to protect its staff and students.

Application to the Education Context

Delivery of the Prevent duty is often locally led and driven by analysis of the threat in communities. The DfE and Regional Prevent Coordinators are among the most vital partners in the 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 Regional 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.

[1] Prevent duty: Framework for monitoring in higher education in England 2018-19 onwards - Office for Students
[2] Prevent duty guidance: England and Wales (2023) - GOV.UK
[3] Prevent duty guidance: for Scotland (accessible) - GOV.UK

Protecting 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.

Alignment with the University Partner

To provide a unified approach to monitoring the Prevent duty individual Navitas UPE Colleges operate in collaboration with each affiliate University Partner. Both partners are responsible for observing the duty and each have committed to assuring that the requirements of the duty are met through strong partnership collaboration and cooperation.

As the Lead Provider, each University Partner will maintain primary responsibility for a range of requirements of the Prevent duty. The Navitas UPE College will act in a manner that is consistent with the University Partner polices and practices including reporting incidents, providing appropriate assistance and information, and acting upon any reasonable guidance given or reasonable requests made by the University Partner arising throughout the academic year.

An outline of the responsibilities of each party in relation to meeting the duty through collaborative partnerships are as follows:

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

1. Safety measures for the physical estate of the University including the Navitas UPE College building
2. Case handling of Prevent related incidents referred by the Navitas UPE College
3. Liaison with external agencies and partners, and making referrals as needed for concerns/incidents relating to Navitas UPE College students
4. Providing Prevent training to College student-facing staff periodically as set by the University
5. Submitting the annual Prevent Accountability and Data Return to the OfS including Navitas UPE College referrals in their submissions.

The **Navitas UPE College** is responsible for:

1. Adhering to University Partner Prevent policy and procedures
2. Following Navitas UPE policies relating to safeguarding of students such as this policy (Prevent policy), Safeguarding Children and Vulnerable Adults, IT Acceptable Use policy (Staff and Students), the Freedom of Speech Code of Practice and the External Speaker policy
3. Liaising with the University Partner Prevent Lead (or equivalent authorised staff member, team, committee or department):
    a. during an incident;
    b. to receive information/updates on relevant University policies and procedures relating to Prevent;
    c. to receive local/regional updates from Prevent partners; and
    d. to take assurances from the University Partner on the delivery of Prevent duties for Navitas UPE College staff and students
4. To screen all College events as per the Navitas External Speaker Policy and Freedom of Speech Code of Practice

5. Locally reinforce Prevent in Colleges and liaise with the Navitas Executive Prevent Lead for all Prevent matters
6. 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
3. Confirming and making declaration of the annual Prevent Accountability and Data Return for Navitas UPE

General Principles and Engagement with the Prevent Duty

Outlined below are the general principles that underpin the Navitas UPE approach to Prevent and activity that is carried out to engage and comply with the Prevent duty:

- Our Prevent policy is designed to clarify the responsibilities of our University Partners, Navitas UPE and Navitas UPE Colleges.
- Our Prevent policy is aligned to the Navitas core values (Values in Action) notably that we show 'Respect for each other' including the safety and welfare of our community.
- A Prevent lead will be identified and appointed at Executive Leadership level within Navitas UPE and a local supporting Lead within each Navitas UPE College (known as a College Prevent Lead) – see 'Key Contacts' for details (page 3).
- Overall accountability for Prevent in Navitas UPE rests with the Navitas UK Governing Body.

Assessing the Risks Associated with Prevent

An assessment of the risks of Prevent within the setting for the Navitas UPE College network are recorded centrally and reviewed on a periodic basis. Together with a yearly action plan the documents are reviewed by the Navitas Central Operations team, Navitas UPE Executive Prevent Lead and the Navitas UK Governing Body (as delegated to the Risk and Audit Committee three times per year).

Navitas UPE Colleges will produce their own action plans or follow the University Partner's action plan where the local level of risk associated with Prevent raises to a level deemed significant that further interventions may be required to control and mitigate Prevent related activity.

Welfare Support Systems and Concern/Incident Reporting

Navitas seeks to support vulnerable individuals within our Navitas UPE Colleges at an early stage to maintain a safe and supportive environment. This support may vary, depending on individual circumstances, but essentially be in the form of a comprehensive student welfare support programme. This will likely include entering a student into the Student Compass Programme (see Student Support policy), mentoring/counselling and actively including students in Prevent related conversations through various student engagement activities throughout the academic year (see Student Engagement policy).

Unless there is a direct threat of physical harm to an individual, concerns should initially be directed towards the appropriate College Prevent Lead who will offer advice and support and coordinate a suitable response – see 'Key Contacts' for details (page 3).

Full procedural activity for raising or reporting a concern/incident can be found in the 'Procedures for Prevent related concerns or incidents' section of this document (Appendix A).

External Speakers and Events, and Freedom of Speech

Navitas UPE has in place an External Speakers policy allowing a clear framework to ensure external speakers and events held within the Navitas UPE College are appropriately organised, managed and adhere to specific guidelines upholding the Navitas UPE Freedom of Speech Code of Practice. The policy operates collectively with the Freedom of Speech Code of Practice identifying applicable laws, principles, expectations and requirements to uphold freedom of speech and academic freedom.

Navitas seek to expose students to a wide range of views, including those that challenge commonly accepted ideas and conventional wisdom. There should be no limit in principle to the range of views within the law to which students, staff and members might be exposed to including views that some or all students might find shocking, disturbing or offensive.

However, an event which creates an atmosphere of fear, harassment, intimidation, verbal abuse or violence particularly in connection to age, disability, gender, gender re-assignment, marriage and civil partnership, pregnancy and maternity, race, nationality, religion or belief, or sexual orientation is likely to be unlawful. Staff and students must be able to identify and 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.

Any views expressed by any external speaker that promotes any illegal organisation or purpose, including organisations listed on the UK Government's list of proscribed terrorist groups or organisations will be deemed unlawful and therefore will not receive permission to speak at an event.

The External Speaker policy and the Freedom of Speech Code of Practice can be found on the policies section of the College website and staff Policy Hub.

Training

Prevent training and periodic awareness, including policy and procedure updates, is provided to student-facing staff to enable them to fulfil their function effectively. This will include any new student-facing staff members as part of the onboarding process at the Navitas UPE College.

The training is tailored to meet the Navitas UPE specific operating context and will be facilitated by the University Partner, Local Authority or by using UK Government training resources - using a mixture of face-to-face training and on-line content. Engagement with any relevant training shall be recorded by the Navitas UPE College and refreshed every two years or in accordance with the University Partner policy on Prevent training (whichever is sooner).

College Prevent Leads will undergo additional training to enhance knowledge and provide themselves with necessary skills to carry out their duties to support the organisation in adhering to the Prevent duty.

Students will be made aware of the key principles of this policy and the subsequent procedural requirements during their orientation period with the Navitas UPE College. This may be through induction materials or through the guidance of the student handbook.

IT Acceptable Use Policy

Navitas UPE has in place an IT Acceptable Use Policy for both staff and students which applies to the use of all IT facilities and equipment. The premise of the Prevent duty is captured and reflected in the policy setting out a range of activities that would be of concern to the organisation 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, 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 is available for anyone, staff or students, when first logging into a Navitas UPE network device.

Students are made aware of the acceptable and unacceptable requirements of using IT equipment and networks whilst studying during their orientation period.

When a staff member first joins Navitas UPE they are asked to read and confirm acceptance to the IT Acceptable Use policy.

Navitas UPE does not own the physical estate of the College (College buildings, facilities), therefore the University Partner will be responsible for the various measures in place to prevent the facilities being exploited by radicalisers. This extends to any IT equipment, networks or platforms that are available for College students to access within the College building or wider University estate (library, classrooms, canteen, etc). The University Partner will monitor in a similar way to Navitas UPE by using filtering methods and restricting access to inappropriate content. The University Partner will liaise directly with the Navitas UPE College where there are concerns for the safety of a student and to provide information to the College about the behaviour of a student accessing inappropriate content.

Engagement with Students and Staff

A Navitas UPE College will not have a Student Union but may have student electives or representatives that form a student committee/forum (sometimes referred to as the Student Voice). Engagement and consultation with students on safeguarding issues, including Prevent, will be included at least annually as a standing item on student committee/forum meetings to share updates as appropriate.

The Prevent duty is included as a standing item on the College Senior Management Team (C/SMT) agenda under the broader safeguarding and student welfare theme. C/SMT will receive updates on Prevent activities, including case management, from the College Prevent Lead as frequently as required.

The College Prevent Lead will liaise with the University Partner Prevent Lead (or equivalent authorised staff member, team, committee or department) where a concern/incident has been referred. Furthermore, the Navitas

UPE College will engage in partnership committees/working groups to receive information and updates on relevant University Partner policies and procedures relating to Prevent (and general safeguarding), to receive local/regional updates from Prevent partners and to take assurances from the University Partner on the delivery of Prevent duties for Navitas UPE College. The College will provide a report to the University partner on Prevent related matters as often as the partner requests.

Confidentiality and Data Protection

The Prevent duty guidance includes an expectation that higher education providers will share concerns about individuals that may be vulnerable (children or vulnerable adults) to being radicalised, where appropriate, and engage with local partners such as police and the Regional Prevent Coordinators. Information sharing is also vital to help Navitas UPE to understand the various localities in which each Colleges operate in, the wider context a multi-site organisation and the assessment of risk. Information sharing is vital in promoting the safety, welfare and educational outcomes of students and staff.

The GDPR and Data Protection Act 2018 do not prevent, or limit, the sharing of information for the purposes of keeping children and vulnerable adults safe. Where there are concerns about the safety of a child or vulnerable adult, the sharing of information in a timely and effective manner between organisations can improve decision-making so that actions taken are in the best interests of the child or vulnerable adult. The GDPR and Data Protection Act 2018 place duties on organisations and individuals to process personal information fairly and lawfully; they are not a barrier to sharing information, where the failure to do so would cause the safety or wellbeing of a child or vulnerable adult to be compromised. Similarly, human rights concerns, such as respecting the right to a private and family life would not prevent sharing where there are real safeguarding concerns. The most important consideration is whether sharing information is likely to support the safeguarding and protection of a child or vulnerable adult.

As far as possible, the confidentiality of all individuals involved in any allegation, investigation or resulting disciplinary proceedings will be respected by Navitas UPE. However, there may be circumstances in which it is necessary or a legal requirement for Navitas UPE to share information with third parties as prescribed above. Information may also need to be disclosed if there is a public interest imperative. Navitas UPE cannot therefore guarantee that the confidentiality of any disclosures can be maintained in all circumstances.

If a staff member or student is uncertain about sharing sensitive information or in an instance where the local authority or emergency services are involved (Police) the Navitas UPE Data Privacy team must be informed to ensure the necessary laws and regulations regarding processing data are met.

Communication of the Policy

This policy will be communicated to staff and students once per academic year. It will be published on the College website and on Policy Hub (staff access) to ensure that it is available to all those within the Navitas UPE community.

Policy Review

This policy will be reviewed every two years unless there are internal or legislative changes that necessitate an earlier review.

Appendix A - Procedures for Prevent Related Concerns or Incidents

The following steps and escalation routes will be taken by Navitas UPE and its network of Colleges to comply with the Prevent obligations, in the event that a particular concern is raised or an incident manifests.

Each Navitas UPE College will have in place a referral channel where the emergence of any concerns or incidents around vulnerable individuals is highlighted.

- Any member of staff, student or other individual engaged in Navitas UPE related activity or at a facility operated by Navitas UPE may identify concerns about a member of our community who appears vulnerable to the risk of being drawn into radicalisation, based on:

    - information received
    - behaviour reported to them, or
    - directly observed.

Staff members, students and individuals raising a concern or incident should follow the procedure below:

Step 1: Disclosing or reporting a concern or incident

In the first instance **a specific concern should be raised with the College Prevent Lead** or in their absence the Navitas UPE Executive Prevent Lead. If this cannot be achieved in person or by using the 'Key Contact' details on page 3 of this document a concern or incident can be reported through the Navitas UPE incident reporting tool - Donesafe.

There are three different levels of disclosure, and the decision about whether to do one, two or all three rests with the person raising the concern/incident. They may choose to:

- make an anonymous disclosure
- make a named disclosure
- make a formal report

The Donesafe incident reporting software is the primary reporting tool for students or staff members to lodge anonymous disclosures, named disclosures, or a formal report.

Anonymous disclosures, named disclosures or formal reports can be made using the publicly available Donesafe reporting portal.

Students: Click here to access the portal Donesafe External

Staff: Click here to access the portal anonymously Donesafe External
Click here to access the portal through your Navitas user account Donesafe Staff

Where there is an immediate concern or a person's physical wellbeing is under threat the correct referral process is to call 999 and then inform the College Prevent Lead / report through the reporting tool.

Please note:

- Disclosers also have the option of making a formal report as a first step. They may also wish to make a report to the Police.
- Making a report to the Police will not stop Navitas UPE from acting on reports or issuing a referral of a report unless Navitas UPE is advised by the Police that an internal investigation may impact a Police process.
- Disclosers may choose to report a concern/incident directly to the University Partner through the separate reporting procedures and tools of the Partner.
- Navitas UPE may formally report or investigate anonymous or named disclosures where warranted by the circumstances of the concern/incident.

Step 2: Receiving a concern or incident

A concern or incident will be presented to the College Prevent Lead either:

- in person, by any member of staff, student or other individual engaged in Navitas UPE related activity or at a facility operated by Navitas UPE, or
- by receiving the disclosure through the reporting system.

Where the concern or incident is raised in person the College Prevent Lead will add the concern or incident to the Donesafe reporting tool entering the relevant details of the case.
Where the concern/incident is raised directly through the reporting tool the College Prevent Lead will receive notification and details of the concern or incident within 24 hours.

The College Prevent Lead must then weigh up all the evidence received and determine on the balance of information to:

- Make a referral to the University Partner Prevent Lead (or equivalent authorised staff member, team, committee or department), or
- Request further or supporting information from the staff member, student or individual reporting a concern or incident to determine whether a referral to the University Partner is to be made.

At this stage the College Prevent Lead may consult with the College Director / Principal, Navitas UPE Executive Prevent, Navitas UPE HR Representative (where a concern/incident has been made about a Navitas UPE staff member) and/or the University Partner Prevent Lead (or equivalent) to seek further advice on making a referral.

Step 2: Referring to the University Partner

The College Prevent Lead will refer and share information of the concern or incident with the University Partner Prevent Lead (or equivalent) who will then provide case handling and management of the concern/incident thereafter. The College Prevent Lead should remain in close contact with the University Partner Prevent Lead (or equivalent) to offer support as and when required. The University Partner will determine whether a referral is required to the Police and any other relevant stakeholders, including the Regional Prevent Coordinators, depending on the circumstances of the concern/incident. The University Partner will also determine, in collaboration with the Navitas UPE College, the most appropriate support required to an individual as the concern/incident is being managed. This will include decisions on disciplinary matters where a concern/incident warrants the enactment of the policy (see Student Disciplinary Policy or Staff Disciplinary Procedure).

Appendix B - Further Information and Guidance / Resource

Further information, guidance and interpretation of this policy should be sought from the College Prevent Lead in the first instance.

There are a number of resources available to gain further knowledge and support about the UK Government's Counter-Terrorism and Security legislation. This includes the regulation for higher educational institutes, practical information, advice, guidance and support services and further training opportunities.

Office for Students (OfS):
The Office for Students (OfS) monitors what higher education providers do to prevent people from being drawn into terrorism.
https://www.officeforstudents.org.uk/for-providers/student-protection-and-support/counter-terrorism-the-prevent-duty/

Prevent duty guidance: England and Wales (2023):
This is the statutory guidance for England and Wales, issued under Section 29 of the Counter-Terrorism and Security Act 2015.
https://www.gov.uk/government/publications/prevent-duty-guidance

The Prevent duty in higher education (HE): training and guidance for practitioners:
Training materials and guidance on the Prevent duty for those working in higher education (HE).
https://www.gov.uk/government/collections/the-prevent-duty-in-higher-education-he-training-and-guidance-for-practitioners

Prevent duty toolkit for local authorities and partner agencies:
The Prevent duty toolkit supports the delivery of the Prevent duty by local authorities in England and Wales by providing practical information and suggestions to prevent people from becoming a terrorist or supporting terrorism. It includes examples of good and best practice in putting the Prevent duty guidance into action.
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:
Guidance on protecting people susceptible to radicalisation.
https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/964567/6.6271_HO_HMG_Channel_Duty_Guidance_v14_Web.pdf

Educate Against Hate:
A website dedicated to resources based on UK Government advice and trusted resources to help safeguard students from radicalisation, build resilience to all types of extremism and to promote shared values.
https://www.educateagainsthate.com/

ACT:
Action Counters Terrorism (ACT) is an online toolkit for spotting the signs of radicalisation and extremism by acting early.
https://actearly.uk/