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OF ESTATE MANAGEMENT

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Prevent

Procedure

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1. Introduction

1.1 Background

The following procedure relates to the overarching [UCEM Code of Practice: Safeguarding and Prevent \(opens new window\)](#), and intends to provide more detailed information on the procedures that UCEM follows in relation to Prevent.

The UK Government published the Prevent Strategy in 2011, one of four strands of the wider counter-terrorism strategy 'Contest'. The Counter-Terrorism and Security Act (2015) introduced a package of further measures aimed at countering the risk of terrorism, and as part of this it is mandatory for all Further and Higher Education Institutions "to have due regard to the need to prevent people from being drawn into terrorism". Please see the [Prevent Strategy publication on the UK Government website \(opens new window\)](#) for more information.

The Prevent Strategy deals with all forms of terrorism, including non-violent extremism, which can create an atmosphere conducive to terrorism. The Strategy makes clear that preventing people becoming terrorists or supporting terrorism requires a challenge to extremist ideas, where they are used to legitimise terrorism, and appropriate interventions to stop people moving from extremist (legal) groups into terrorist –related activity.

1.2 Prevent and UCEM

The underlying considerations adopted by UCEM in implementing the Prevent Duty are:

- A commitment to the safety and wellbeing of our staff and students, including not being victims of, or complicit with any activities linked to radicalisation or extremism;
- Preserving equality and diversity as foundations of UCEM, whilst ensuring that these values are not threatened;
- Promoting the fundamental British Values of: Democracy; The rule of law; Individual liberty; Mutual respect and tolerance;
- To continue to champion the spirit of academic freedom and freedom of speech set out in our [Freedom of Speech Policy](#);
- That the requirements described in this procedure are implemented in a proportionate and risk-based manner.

2. Definitions

The key definitions for the purposes of this policy are taken from the guidance issued from the UK Home Office related to the prevent duty:

Extremism – vocal or active opposition to fundamental British values, including democracy, the rule of law, individual liberty and mutual respect and tolerance of different faiths and beliefs.

Radicalisation – the process by which a person comes to support terrorism and extremist ideologies associated with terror groups.

Terrorism – 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.

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The use or threat must be designed to influence the government or to intimidate the public, and is made for advancing a political, religious, or ideological cause.

Investigation - where a Prevent related concern about a student or member of staff is raised, the DSL will be notified. The DSL will review the concern and will escalate this to the appropriate external agency if they consider that the concern has substance. UCEM will refer **all** cases externally where there is considered to be **any** risk of a Prevent related concern.

3. Criteria

This procedure is applicable to all UCEM staff (including temporary staff), volunteers, students, apprentices, and trustees.

4. Guide to the Procedure

4.1 Introduction to the procedure

This procedure details how to raise concerns relating to radicalisation, extremism, or terrorism (including vulnerability to these). Prevent is an extension of our Safeguarding obligations, and so concerns should be reported in the same way, via the Safeguarding team by calling 01184672400 (see [Appendix A: Staff Responsibilities](#)) and following up with an email to safeguarding@ucem.ac.uk. For more information on how the procedure works, please see [Section 5: Stages of the Procedure](#).

4.2 Timescales

<i>Issue</i>	<i>Timescale</i>
<i>Staff or student has a concern that they need to refer to the DSL via the Safeguarding team.</i>	Immediately wherever possible. Where a staff member cannot immediately notify the DSL (for example on a weekend), the staff members should make the referral as soon as possible and should notify the police by calling 999 in an emergency.
<i>Safeguarding team will acknowledge concern and begin investigation.</i>	One working day.
<i>Safeguarding team will close concern, offering ongoing support if appropriate.</i>	This will be dependent on the case, the needs of the student, and the guidance from the Local Authority/ Department for Education.

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4.3 Support available

UCEM offers support services to students through the academic team (including Programme Leaders, Module Leaders, and Module Tutors), as well as Student Services, including the provision of the Safeguarding team (see [Appendix A: Staff Responsibilities](#)). Where a student shows a concerning change in behaviour, including online activity such as on the Virtual Learning Environment (VLE) or in a video conferencing session, UCEM will follow up and support the student as required, to check for welfare concerns and offer support. This may include where it has been identified there is a possibility of a student being radicalised.

4.4 Outcomes of the procedure

Both students and staff are asked to refer any concerns they have about a member of staff or student that has been radicalised or is at risk of being radicalised or drawn into extremism or terrorism. It is important that any concerns are shared in a safe and supportive manner, to enable concerns to be investigated and any appropriate intervention to be developed.

UCEM will investigate any reported issues through speaking with students or members of staff, where appropriate, to gather further information. All concerns will be considered thoroughly and fairly.

There are three potential outcomes of the investigation:

1. No further action is required. In this instance a confidential record of the case will be kept.
2. There is substance to the concern, but it is not related to Prevent. Internal action is required. The exact nature of the action taken will depend on the nature of the case, but most likely supportive intervention would be provided.
3. If there are significant issues which suggest that a criminal act may be or has been committed, or that the health, safety or welfare of a student or others is at risk, then UCEM will refer the case externally.

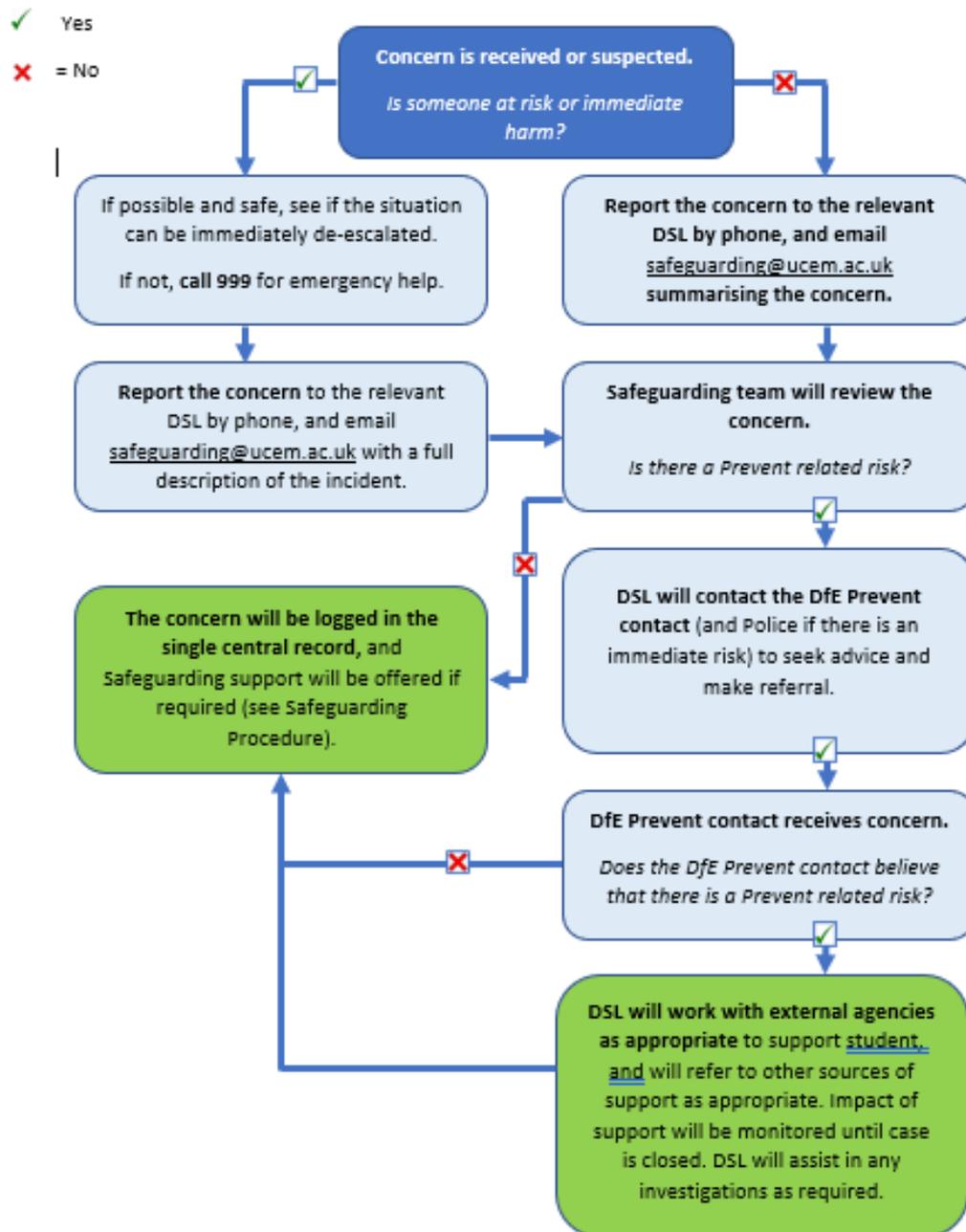
If a concern is deemed to be valid, UCEM will work closely with representatives from the Department of Education, this may include recommending that someone is referred to the Channel Programme. Channel is an early intervention, multi-agency process designed to safeguard vulnerable people from being drawn into extremism.

A confidential record of all internal and external referrals made under this policy will be kept. These will be kept in accordance with the Data Protection Act 2018 and the General Data Protection Regulation (GDPR).

In cases where outcomes 1 or 2 described above are necessary, or in the case of a vexatious referral, UCEM may take further actions in line with other UCEM Policies and Procedures, including disciplinary action as appropriate, or termination from programme.

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5. Stages of the Procedure



(Image: Flowchart explaining the steps to the Prevent Procedure)

6. Guidelines for Members of Staff/Students

6.1 Concerning behaviour

It can be difficult to know which behaviours should be treated as concerning. Just because an individual is displaying concerning behaviour, this does not necessarily mean that there is a Prevent concern. However, someone who is displaying concerning behaviour is likely to be vulnerable, and so the Safeguarding team should be made aware. UCEM adopts the approach that if you are unsure, then you should always refer. A list of examples of behaviours which are concerning can be found in the [UCEM Code of Practice: Safeguarding and Prevent \(opens new window\)](#). There are particular risks and concerns relating to extremism and online safety; more information about these risks and how to protect yourself can be found in Appendix C- [Extremism and Online Safety](#).

For example, a concern could include messages that you consider inappropriate on the Virtual Learning Environment (VLE); which may be due to the content of the message or language that is used. Alternatively, you may be concerned on content that is covered at a face to face, workshop or CPD event or a synchronous event such as a webinar, which you consider may be encouraging others to be drawn into extremism and/or terrorism.

Many of our students are also involved in WhatsApp groups that are linked to their programme. Whilst these are run by students not by UCEM, if a message is posted in 'What's App' that you are uncomfortable with due to its content; or you feel the messages are creating an atmosphere that is conducive to extremist and/or terrorist activity, you must raise this with UCEM by contacting the DSL by emailing safeguarding@ucem.ac.uk or calling 01184672400.

6.2 Leadership and Governance

UCEM takes its statutory responsibility seriously, with oversight by the UCEM Board of Trustees to ensure that the organisation satisfies the requirements of the Prevent duty. UCEM has delegated responsibility of leadership and implementation to the Deputy Principal and University College Secretary. A report will be presented to the Board of Trustees as part of the six-monthly compliance report.

6.3 Risk Assessment and Action Plan

UCEM has undertaken a Prevent Risk Assessment and Action Plan to establish how and where students and staff might be drawn into terrorism. The Risk Assessment and Action Plan are reviewed twice a year by the Board of Trustees. At present, the risks are considered to be low, due to the nature of UCEM's delivery. UCEM does not have a physical campus or Student Union, students are not using UCEM IT systems and UCEM does not hold many physical events. UCEM recognises and takes seriously its responsibilities and will therefore keep the level of risk under review.

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6.4 Staff Training

UCEM ensures that all of its academic and professional services staff have received training on how to identify staff and students that are at risk of radicalisation and may be drawn into terrorism. New members of staff should complete their Prevent training before the end of their probationary period. A log of this training, including timeframes for updates, is maintained internally. Staff training will be formally refreshed every 3 years, with updates at least annually.

Temporary staff and/or volunteers working for UCEM must participate in Safeguarding and Prevent training and/or awareness raising. Where a temporary staff member/volunteer is working for UCEM for a period of more than a month, the staff member should complete the full Safeguarding and Prevent training available on the VLE. Where a temporary staff member and/or volunteer is expected to work for UCEM for a period of less than a month, they should meet with the DSL to go through expectations relating to Safeguarding and Prevent and should be supervised closely by their line manager.

6.5 External Speakers

UCEM has an [External Speakers Policy \(opens new window\)](#) which sets out the approval process for booking external speakers, and a code of conduct for all speakers. A proportionate risk-based approach is used to assess external speakers, to ensure that UCEM does not use speakers where there is any risk that they will encourage or promote terrorism or seek to incite hatred or violence against others.

6.6 Awareness Raising

Staff and students are made aware of the process for referring concerns regarding students and staff that may be vulnerable to radicalisation (see [Section 8: Benchmarked Policies and Guidance](#)).

7. Monitoring and review

This procedure and its related documents will be fully reviewed on a 4-year basis, as is UCEM procedure. The Safeguarding team will review the procedure at least annually, to check that it is still up to date and compliant with relevant legislation and requirements.

8. Benchmarked Policies and Guidance

This policy should be read in conjunction with the following policies, procedures, and guidance documents, which set out details that relate to key aspects of UCEM's approach to safeguarding:

8.1 Students

- [UCEM Code of Practice: Safeguarding and Prevent \(opens new window\)](#)
- [Staff Safeguarding Code of Conduct - Part 1 \(opens new window\)](#);
- [Staff Safeguarding Code of Conduct - Part 2 \(opens new window\)](#);
- [Student Anti-Bullying and Harassment Procedure \(opens new window\)](#);

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- [Online Safety Guidance \(opens new window\);](#)
- [Safeguarding Procedure \(opens new window\);](#)
- [Online Protocol – A Student’s Guide for the VLE \(opens new window\);](#)
- [UCEM Code of Practice Chapter: Admissions and Recognition of Prior Learning \(relating to the recruitment of students with criminal convictions\) - Higher Education Programmes \(opens new window\);](#)
- [UCEM Code of Practice Chapter: Admissions and Recognition of Prior Learning \(relating to the recruitment of students with criminal convictions\) - Further Education Programmes \(opens new window\);](#)
- [UCEM Code of Practice: Student Appeals and Complaints \(opens new window\)](#)
- [UCEM Code of Practice Chapter: Neurodiversity Disability and Wellbeing \(opens new window\);](#)
- [Privacy Policy \(opens new window\)](#)
- [Data Protection Policy \(opens new window\)](#)
- [Freedom of Speech Policy \(opens new window\);](#)
- [External Speakers Policy \(opens new window\);](#)
- [Code of Practice: Equality and Diversity \(opens new window\);](#)

8.2 Staff

- [IT Acceptable Use Policy - Staff \(opens new window\);](#)
- [Recruitment Policy - Part 1 \(opens new window\);](#)
- [Recruitment Policy – Part 2 \(opens new window\).](#)

Relevant for face-to-face sessions (on or off-site)

- [Health and Safety Policy and Procedures \(opens new window\);](#)

This policy is also benchmarked against relevant statutory frameworks, which are listed in [Appendix B: Safeguarding and Prevent – Statutory Frameworks](#).

Appendices

Appendix A - [Staff Responsibilities \(opens new window\)](#)

Appendix B - [Safeguarding and Prevent - Statutory Frameworks \(opens new window\)](#)

Appendix C - [Extremism and Online Safety \(opens new window\)](#)