

Prevent Duty

1 Introduction

- 1.1 The Counter Terrorism and Security Act 2015 came into force for higher education providers in September 2015, placing a legal obligation on providers to have 'due regard to the need to prevent people from being drawn into terrorism' (known as the Prevent Duty). It forms one of four strands of the government's counter-terrorism strategy (CONTEST) and aims to stop people from becoming drawn into terrorism.
- 1.2 The Office for Students is responsible for monitoring the Higher Education sector's implementation of the Prevent Duty in England.
- 1.3 Due to the geographically diverse nature of the student population it is not reasonable or appropriate for us to establish partnerships with multiple agencies around the UK or internationally. Therefore, the main contact point for sharing information regarding our students will be the Regional Prevent Coordinator.

2 Approach

- 2.1 Our approach to implementing our Prevent duty is primarily one of safeguarding the welfare of our students and staff. Our response to the Prevent duty is guided by our values of integrity, inclusiveness and our commitment that everyone within our online community is treated with dignity and respect.
- 2.2 Whilst we will act within the law and ensure compliance with the Prevent duty, our approach will be proportionate to the online context in which we operate. In particular, any measures relating to Prevent will be managed with recognition of the importance of freedom of speech. We are also clear that this approach will not be directed at any particular ethnic, social, ideological or religious group.

Freedom of Speech

- 2.3 We are committed to freedom of speech and as far as is reasonably possible study or employment with us will not be denied to any registered student, member of staff, Associate Tutor on any grounds relating to their belief or views.
- 2.4 Where the expression of those beliefs or views are unlawful and where it is reasonably anticipated that the unlawful expression of such beliefs or views might occur, We reserve the right to prevent by any means those beliefs or views from being expressed within the online learning environment.

Guest Speakers

- 2.5 As an online provider we do not have a physical campus and therefore do not provide faith facilities and we do not have any events outside of the curriculum which have guest speakers.

3 Awareness and Training

- 3.1. All Associate Tutors undertake an introductory online module about the Prevent duty as part of their onboarding induction and training. Student facing staff also undertake training and development relating to safeguarding and the Prevent duty.

4 Oversight and Governance of Prevent

- 4.1. The Executive Management Board maintains oversight of our approach to the Prevent duty. The Director of Quality and Student Services is the designated Prevent Lead and reports directly into the Executive Management Board.
- 4.2. An annual report on the number of Prevent cases is submitted to the Executive Management Board and to the University of Liverpool.

5 Use of the VLE and IT Networks

- 5.1. It is strictly forbidden to use the Virtual Learning Environment (VLE) or the website, IT facilities, or other elements of the information management systems or processes for the promotion, planning or execution of violent extremism in the name of ideology or belief.
- 5.2. We reserve the right to exercise control over all activities on our IT facilities and networks, including monitoring of systems and electronic communications and access to external electronic resources. The undertaking of such monitoring is part of the support and guidance that we provide for our students. In the context of the Prevent Duty this monitoring will be used to establish the existence of facts, to prevent or detect crime, or to investigate or detect unauthorised use of telecommunication systems.
- 5.3. Any extremist material identified on social media services such as Facebook or Twitter which are reported to us will be investigated accordingly.

6 Student Welfare and Support

- 6.1. We provide support to students in the form of a dedicated Student Support Team for each academic area.
- 6.2 The student support team will:
- welcome students to their programme and provide information about the learning platform and signpost students to available resources and additional support.
 - contact students at regular intervals to establish a close rapport and ensure that they are comfortable with all aspects of the programme;
 - monitor attendance on the platform and contact students in the event that they do not meet the attendance requirements and if necessary, alert the tutor to determine an appropriate course of action;

- Provide the first point of contact for student to discuss any concerns relating to their course, and provide information on safeguarding support services both internal and external to the organisation

The Head of Student Experience and Welfare and the Deputy Director of Student Services are designated safeguarding officers.

7 Reporting Procedure

- 7.1 Any staff member, Associate Tutor or student may identify concerns about extremist beliefs or views being expressed on the learning platform; or about an individual potentially being drawn into violent extremism.
- 7.2 It is important that such concerns can be shared in a safe and supportive fashion to enable concerns to be investigated and an appropriate intervention be developed, if required. It is equally important that assumptions are not made on the basis of information received and that referrals are investigated thoroughly and fairly. We will seek to approach such concerns from the perspective of safeguarding the individual about whom concerns have been raised.
- 7.3 Only where there is clear and compelling evidence of a requirement to do so will information be shared with the Regional Prevent Coordinator.
- 7.4 Where a student has concerns that a fellow student is expressing violent extremist views of beliefs or is at risk of being drawn into violent extremism should notify this concern to the Student Support Team, who will then notify the Director of Quality and Student Services (Prevent Lead).
- 7.5 Where a permanent staff member or Associate Tutor has concerns that a student is expressing violent extremist views of beliefs or is at risk of being drawn into violent extremism should notify this concern to the Director of Quality and Student Services (Prevent Lead).

8 Responsibilities of the Prevent Lead

- 8.1. The Director of Quality and Student Services (or nominee) will investigate the matter, seeking to gather substantive information and evidence which would allow a full consideration of the case.
- 8.2. Once any available information and substantive evidence has been gathered, the case will be considered by the Prevent Lead and the Senior Management Team, with advice where appropriate from the Regional Prevent Coordinator.

9 Consideration of the Case

- 9.1. The Senior Management Team and Prevent Lead will reach a decision as to the seriousness of the case.

9.2. Potential outcomes are:

- **No further action is required:** In this case a confidential record of the case will be held.
- **There is substance to the case but at this stage only internal action is required:** The exact nature of the intervention required would be determined by discussion with relevant staff members. Actions and a review date would be agreed. At the review the case would be assessed again, and the appropriate actions taken. It is anticipated that in most cases the intervention would be supportive and safeguarding in nature.
- **A referral to the Regional Prevent Coordinator is required:** This decision would only be taken where there are serious and immediate issues of safety to the student and others and/or there is evidence to suggest a criminal act may be committed or has been committed.

10 Sharing of Information

10.1. Due to the geographically diverse nature of the student population it is not reasonable or appropriate for us to establish partnerships with multiple agencies around the UK or internationally. Therefore, the main contact point for sharing information regarding our students will be the Regional Prevent Coordinator.

10.2. We are aware of the Channel process and of the opportunities for informal and formal sharing of information. We will use these following discussions with the Regional Prevent Coordinator and where it is deemed appropriate. Information sharing will only take place with external authorities when this is consistent with the General Data Protection Regulations and with the provisions of the Data Protection Act (2018).

Responsible Manager(s)	Director of Quality and Student Services
Name	Carol Dadd
Date Approved	January 2021