Prevent Strategy 2023-2025

1.   Prevent Strategy

1.1   Section 26 of the Counter-Terrorism and Security Act 2015 places a duty on NMITE to have a due regard to the need to prevent people from being drawn into terrorism. To ensure we carry out this duty, we need to:

- Self- assess and identify the level of risk

- Ensure all staff have access to relevant training

- Ensure welfare support for students is in place

- Have effective IT policies in place

   (Source: Prevent Duty Guidance for England & Wales, HM Government)

1.2   The Prevent Strategy is part of the overarching Safeguarding provision at NMITE.

HR_V6_AY23_25

2. Single Point of Contact:

2.1 The Director of People & Operations for operational delivery of Prevent- related duty is the Single Point of Contact for Prevent and is a member of the Herefordshire Prevent Steering Committee (consisting of representatives from health, police, council and education). Termly meetings take place to develop the Herefordshire Prevent Protocol and links are made with neighbouring Prevent panels, the regional Channel Panel and the West Midlands Regional Prevent Lead for FE and HE.

3. Risk Assessment

3.1 Herefordshire is currently considered a 'low risk' area, with the potential to become 'high risk'. Risk will be assessed in accordance with West Mercia local policing plan and an information sharing protocol with West Mercia Police has been established.

3.2 Where members of staff are concerned about changes in a student's behaviour, or, where the threat from an individual student is known, the Director of People & Operations, with the Registrar, will carry out a risk assessment, and necessary support will be put in place and Channel referrals will be carried out where appropriate.

3.3 The table below shows the risks NMITE face relating to extremist and terrorist activity and are included in the Risk Assessment

Main Objectives	Indicative Risks	Significance	Probability	Action	Comments
NMITE has appropriate procedures and plans in place to manage its exposure to unexpected events	Student/s develop extremist views	High	Low	Accept Risk	NMITE 'Prevent' strategy reduces tendency for students to develop extreme views
NMITE has appropriate procedures and plans in place to manage its exposure to unexpected events	Terrorist incident arising from extremism	High	Low	Accept Risk	NMITE lock down policy will reduce potential impact of such an event

HR_V6_AY23_25

A detailed Prevent Risk Assessment is found in Appendix 1.

4. Staff Development

4.1   All new members of staff take an online Prevent awareness training programme as part of their initial training. This will be followed up with a formal training session by an external provider.

4.2   All staff take part in annual training to raise awareness of Prevent. The basis of this training includes WRAP – based training on the factors that lead to extremist ideas and how certain changes in student behaviour should be reported to the Director of People & Operations. Relevant staff will be briefed about individual cases on a need to know basis.

5. Pastoral Care, Support and Guidance

5.1   Each student is allocated to a Personal Tutor who is responsible for the oversight of the student's work, conduct and general progress. The Personal Tutor will encourage students to talk openly about their protected characteristics, including their beliefs and practices. Personal tutors will raise concerns with the Registrar/Student Services. The Single Point of Contact will make a Channel referral if necessary.

6. Equality

6.1   NMITE's Equality, Diversity and Dignity in the Workplace Policy 23-25 outlines how due regard to the Equality Act 2010 is given to all policies, including this strategy.

6.2   All students are made aware of equality and diversity and how these relate to the Prevent agenda via the Student Equality Diversity and Inclusion Policy 23-25 and during their induction.

7. Student Engagement

7.1   Students are consulted regularly about different aspects of life within higher education, including those relating to Prevent. The views of students will continue to inform NMITE policies.

8. Freedom of Speech and Prevent

8.1   NMITE believes that honest, thoughtful and respectful debate forms a vital part of education, and we provide a safe and welcoming environment where students and staff have the freedom to express and discuss varying views.

NMITE is committed to freedom of speech and academic freedom within the law. As well as forming part of our legal obligations, the ability to test ideas, to engage in reasoned debate, and to challenge constructively are central to our values as a diverse

3

community of students and staff. We seek actively to encourage this in a number of different ways: through the debates and speaker events that we hold, through our staff engaging publicly on topical subjects where they hold academic expertise, and through our education and research.

Our approach to Prevent is consistent with our commitment to freedom of speech within the law. In this context we may invite speakers onto our campuses who hold controversial views provided that we offer opportunities for them to be challenged and for alternative standpoints to be presented. The step of banning speakers or events is only taken exceptionally where extremist views are being promoted and risk members of our community from being drawn into terrorism. Debating political, cultural and religious subjects where differing views may be held does not engage the Prevent agenda and are an expected part of our discourse as a diverse community with students of many nationalities and cultural backgrounds

8.2   All speakers or visitors should be made aware by the person or group 'hosting' them that they have a responsibility to abide by the law and NMITE's policies, including they:

i.   Must not advocate or incite hatred, violence or call for the breaking of the law.

ii.   Are not permitted to encourage, glorify or promote any acts of terrorism including individuals, groups or organisations that support such acts.

iii.   Must not spread hatred and intolerance in the community and thus aid in disrupting social and community harmony.

iv.   Must be mindful of the risk of causing offence to or seek to avoid insulting other faiths or groups, within a framework of positive debate and challenge.

v.   Are not permitted to raise of gather funds for any external organisations or cause without express permission of NMITE.

9. IT Policies

9.1   NMITE's IT Acceptable Usage Policy 23-25 outlines our expectations for appropriate usage and how filtering restricts access to harmful internet content. In the event of a serious breach, NMITE will take any action necessary, including working with outside agencies including, but not limited to, the Police, Security Services etc.

10. Further Information

10.1   If further information is required, please contact the HR Department: HR@nmite.ac.uk

11. Appendix 1 – Risk Assessment

NMITE- Herefordshire is currently considered a 'low risk' area, with the potential to become a 'high risk'. Risk will be assessed in accordance with West Mercia local policing plan and an information sharing protocol with West Mercia Police has been established. Where members of staff are concerned about changes in a student's behaviour, or where the threat from an individual student is known, the Director of People & Operations and the Registrar will carry out a risk assessment and necessary support will be put in place and Channel referrals will be carried out where appropriate.	**Single Point of Contact:** Samantha Lewis – Director of People & Operations **Designated Safeguarding Lead:** Samantha Lewis – Director of People & Operations **Date of Assessment:** August 2023 **Date of Review:** August 2024

Risk Area	Hazard	Prob	Impact	Overall	Existing Measures	Proposed Actions	Risk Owner	Planned Completion Date
Welfare & Safeguarding	Staff or contracted providers are not aware of the NMITE procedure for handling concerns and/or do not feel comfortable sharing issues internally	3	2	6	Staff have received appropriate initial awareness training and are updated with changes to Policies on annual basis.	Annualy F2F Prevent training to be provided by. Updates provided to Trustees Liaise with DfE Prevent Lead for supporting training and information	SL	Complete Complete Complete

	Learners are radicalised by factors internal or external to NMITE	3	5	15		Students will receive training in Equality and Diversity, Safe Internet and Prevent as part of their induction Awareness campaign through bulletins	MKJ	Effective September 2022 and Ongoing
	NMITE is not linked in with statutory partners and/or does not feel comfortable sharing extremism related concerns externally	2	1	2	NMITE is a member of Herefordshire Channel Panel and CTLP Executive where Prevent agenda is discussed and practice shared.	Continued Liaison	SL	Ongoing
Curriculum & Learning	Learners are exposed by NMITE Staff or contracted providers to messaging supportive of terrorism	2	1	2	Appropriate whistleblowing and safeguarding policies for assessing concerns		BG	Complete

HR_V6_AY23_25

					raised by staff or learners.			
	Behaviours which harm the ability of different groups and individuals to learn and work together are left unchallenged.	2	4	8	NMITE expectations are clearly communicated	Staff to receive annual safeguarding updates and are trained in challenging discriminatory behaviour Raising awareness of Code of Practice in respect of updates to incorporate Prevent Agenda	BG SL	Ongoing
Organisational Culture	Staff are not aware of/do not subscribe to the values of NMITE.	2	2	4	Effective talent acquisition and onboarding.	Ongoing staff development	SL	Ongoing
	Staff are unable to raise extremism related organisational concerns due to the lack of an appropriate	2	1	2	Appropriate whistleblowing policy accessible to all staff	Review staff handbook	SL	Complete

	whistleblowing mechanism.							
Management of Space	Learners/Staff are exposed by visiting speakers to messaging supportive of terrorism or which contradicts mutual respect and tolerance for those of different faiths & beliefs	2	4	8	Speakers are signed in and collected by a member of staff and are not left alone with learners Clear guidelines are in place in Prevent Strategy	Training for staff involved in the bookings process if needed	SL	Complete
	Extremist or terrorist related material is displayed within NMITE premises	2	4	8	All materials checked before display. Staff alert		All Staff	

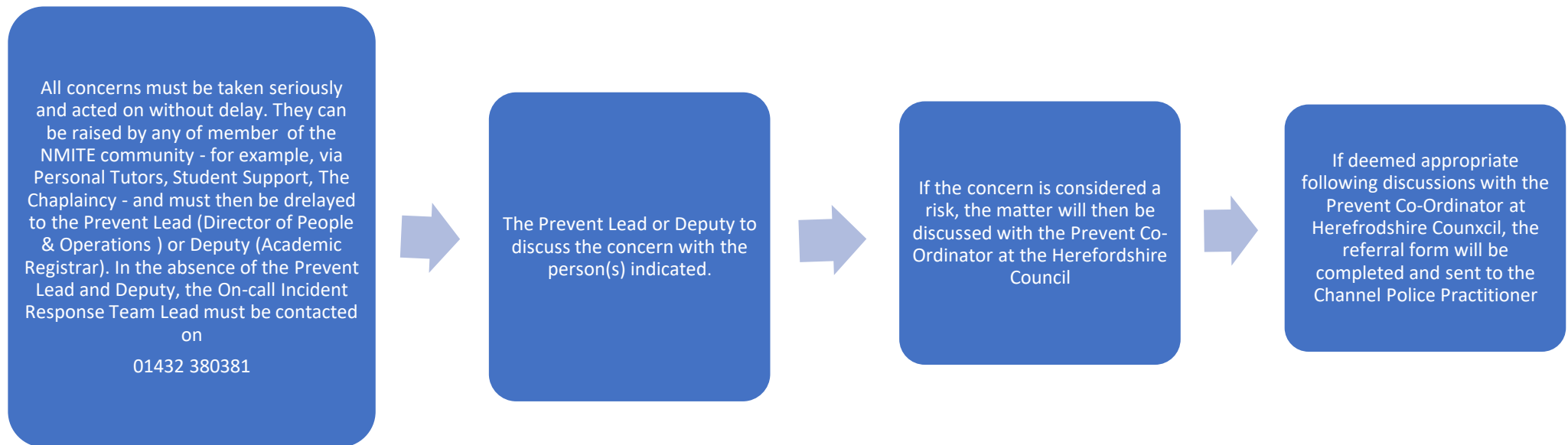|								
	NMITE premises are used to host events supportive of extremist activity, or which popularise hatred or intolerance of those with particular protected interests.	2	4	8		NMITE will have a policy for hiring premises and the responsibilities are binding on all parties.	All staff	Complete
ICT & Online Activity	Learners access extremist or terrorist material whilst using NMITE facilities	3	3	9	NMITE IT Acceptable Use Policy outlines our expectations for appropriate usage.	Initial workshop provided to all learners.	PG	Effective: September 2021 and Ongoing
	Online/social media communications relating to extremist or terrorist material feature NMITE's branding or use NMITE's Social Media Platforms	2	2	4	Marketing Team administers the Corporate pages. Any issues of concern will be blocked and reported to Marketing and HR.	Continue monitoring Social Media	Marketing Team	On-going

HR_V6_AY23_25

12. Appendix 2 -Prevent – Referral Internal Flowchart

All concerns must be taken seriously and acted on without delay. They can be raised by any of member of the NMITE community - for example, via Personal Tutors, Student Support, The Chaplaincy - and must then be drelayed to the Prevent Lead (Director of People & Operations) or Deputy (Academic Registrar). In the absence of the Prevent Lead and Deputy, the On-call Incident Response Team Lead must be contacted on

01432 380381

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The Prevent Lead or Deputy to discuss the concern with the person(s) indicated.

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If the concern is considered a risk, the matter will then be discussed with the Prevent Co-Ordinator at the Herefordshire Council

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If deemed appropriate following discussions with the Prevent Co-Ordinator at Herefrodshire Counxcil, the referral form will be completed and sent to the Channel Police Practitioner

HR_V6_AY23_25

13. Appendix 3 - External Speakers – Statement of Expression

Welcome to NMITE

We are very grateful to you for agreeing to visit NMITE and we are looking forward to working with you.

In order for us to fulfil the Prevent Duty, as with all guest speakers, we would like you to consider the following before you deliver to our students.

- Please ensure that the diversity of the community is respected and equality and good relations between different groups are promoted.

- Within a framework of positive debate and challenge, please do be mindful of the risk of offending or insulting other faiths or groups.

- Please do not gather funds for any external organisations or cause without express permission of NMITE.

- Please do not advocate or incite hatred, violence or illegal activity.

I can confirm that I have read the above and agree to follow these guidelines:

Name:……………………………………………………………..

Signature:……………………………………………

Date:…………………………

14. Appendix 4 - External Speakers - Risk Assessment

In order to fulfil our Prevent Duty, please complete and return to Director of People & Operations before visiting speakers arrive.

About the event

Date & Time		Organiser	
Location		Audience – Staff/Students	
Speaker(s)		Topic	
Organisation		Address of Organisation	

Checklist

Considerations	Yes/No	Details (Email Trail Y/N) Proposed actions to mitigate risks :
I have researched the speaker/organisation and/or know them previously		
I have seen the presentation materials in advance		
I have considered the benefits that the speaker/organisation will bring to students and NMITE		
I have thought about potential risks (e.g. controversial views)		
I have discussed the event with my line manager.		

Name:………………………..…………………

Signature:……………………………..……………….

HR_V6_AY23_25

Author of Policy	Samantha Lewis, Director of People & Operations
Equality Impact Assessment (Equality Analysis) completed	02/06/2020 HR Associate
Date Policy (Re)Approved	08/2023
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Approval Authority	Executive Committee
Date of Commencement	With immediate effect
Amendment Dates	V.6: 05/07/2022
Reason for update	Updated following OfS feedback to provide additional clarity in flowcharts and detail re student processes.
Date for Next Review	01/08/2025
Related Policies, Procedures, Guidance, Forms or Templates	Safeguarding Policy Freedom of Speech Policy
Policies/Rules Superseded by this Policy	V1.0: June 2019 V2.0: Feb2020 V3.0: Oct 2020 V4.0: Oct 2020 V5.0: Feb 2021 V6.0: Juy 2023
Summary of changes made to this version	Detail added to flowchart and student-related processes. Dated amended due to C-19 Restrictions. Amend to policy year Amend to font – Manrope Amend to role/title Amend to grammar Amend to other policy reference dates Blank page moved up