

Title:	Prevent Policy
Code:	WBPP-01
Published:	April 2023
Last review date:	August 2026
Next review date	August 2027
Approved by:	Senior Management Team
Policy owner:	College Manager

You should familiarise yourself with the entirety of this Policy, and we would particularly draw your attention to the following elements that have been amended or updated since the last version of this policy:

Appendix 1	Prevent Review Panel Membership • Chief Operating Officer – Steve Cobain • Group Head of Estates – Charley Weissenhorn • Head of Estates Sheffield – Glenn Thompson • Head of Undergraduate Studies Brighton – Tom Stevens • Head of Education Sheffield – Jason Rungapadiachy • Head of Education Online – Kaya Herstad Carney • Student Services Manager and DSL Brighton – Hannah Reed • Student Services Manager and DSL Sheffield – Carmel Carey
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1. Introduction

1.1. Purpose. The College is required under the [Counter-terrorism and Security Act 2015](#) to ‘have due regard to the need to prevent people from being drawn into terrorism’. Under section 29, it must have regard to guidance issued by the Home Secretary. [The Prevent Duty Guidance for higher education institutions in England and Wales](#) came into effect on 18th September 2015 following approval by parliament. This document sets out how we are complying with the Duty.

1.2. Scope. The Prevent Policy applies to all staff and (where relevant) students of the College. In the context of this policy, the term ‘students’ is intended to include anyone studying at the College.

1.3. Definitions

1.3.1 **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. The use or threat must be designed to

influence the government or to intimidate the public and is made for the purpose of advancing a political, religious or ideological cause.

1.3.2 **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.

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

2. Prevent Policy

2.1. Approach

2.1.1 The College welcomes the Government's intention that the Prevent Duty is implemented 'in a proportionate and risk-based way' and that it should not create large new burdens on institutions. We therefore intend to implement our legal responsibilities as part of existing policies and procedures, which will also ensure a joined-up approach. In doing this, we will actively involve key stakeholders in the WaterBear organisation and consult where necessary, should any changes to this policy be required in the future.

2.1.2 A College-wide risk assessment has been completed and will be reviewed 3 times per year and updated where necessary.

2.1.3 We take seriously our responsibility to ensure the safety and wellbeing of students, staff and the wider community and as part of this would wish to do all that we can to prevent any member of the College community from being drawn into extremism, radicalisation, and ultimately terrorism. We also value the principles of academic freedom and general freedom of expression. Some of the ways in which we meet these responsibilities are set out in this document.

2.2. Leadership

2.2.1 The College takes seriously at the highest levels the need to prevent extremism from developing and/or terrorism from occurring in our community.

2.2.2 Our policy has been approved by the College Senior Management Team and will be reviewed periodically to ensure it is fit for purpose.

2.2.3 The Chief Operations Officer (COO) has been identified as the member of the senior team responsible for ensuring that the colleges comply appropriately with the Prevent Duty, in liaison with the relevant regional Prevent Education Coordinator and other key stakeholders within and beyond the College.

2.2.4 An annual report will be made to the Chief Executive Officer (CEO) who reports to the WaterBear Board of Directors.

2.3. Risk Assessment and Action Plan

2.3.1 As required by the Prevent Duty, we carry out assessments of the risk of our students being drawn into terrorism. This risk assessment is reviewed three times per year by the WaterBear Prevent Review Panel. Where any significant risk is identified, we will consider what action might mitigate the impact/likelihood of that risk materialising, and if necessary, include it in the College Prevent Action Plan.

2.4. External Speakers, Guests and Masterclasses

2.4.1 The College takes seriously its duty to comply with legal requirements to secure freedom of speech within the law, not least the duty under the [Education \(No.2\) Act 1996](#). Where views are expressed that risk drawing people into terrorism or are shared by terrorist groups, permission must be sought by the staff from the COO, and where necessary the CEO. Due diligence is carried out where required, and we will share information with other institutions if appropriate about any particularly problematic event that comes within the remit of Prevent.

2.4.2 In complying with the Prevent Duty, the College will not provide a platform for any proscribed terrorist organisation or encourage terrorism in any way or allow gender segregation at any event.

2.5. Staff Training

2.5.1 We will carry out training on a regular basis for all relevant staff so that they can recognise those who are vulnerable of being drawn into terrorism and potential signs of radicalisation. It will include an explanation of how to handle appropriately and sensitively any concern that may emerge.

2.5.2 For those with whom any specific concerns will be raised (primarily staff in Student Services teams), differentiating the risk of radicalisation from other issues will be covered in more detail, together with the opportunities and requirement to share information confidentially where needed.

2.5.3 We are committed to supporting all vulnerable students and responding to concerns in a balanced way. We recognise that while some behaviours may suggest radicalisation, they are often linked to other issues. We will assess concerns proportionately and ensure that any support provided is appropriate to individual needs.

2.6. Pastoral Care. Pastoral care is available to support students in a variety of ways. Specialist support is provided through the Student Services Team, where referral to external agencies can be made where necessary and appropriate.

2.7. IT Networks

2.7.1 We consider it unacceptable for our IT networks to be used in any way that supports, promotes or facilitates terrorism.

2.7.2 We have referenced Prevent on our relevant IT policies and will keep under regular review our internet security protocols and systems as a means of restricting access to content covered by the Prevent Duty as part of our risk assessment process and in discussion with other institutions and agencies.

2.7.3 Social media services provide new avenues for the distribution and accessing of extremist material, and the College takes the challenges presented by social media very seriously. If any misuse of the College's branding on social media accounts is discovered, action will be taken in accordance with the terms and conditions of the relevant platform.

2.8. Communications

2.8.1 We will not permit material supporting extremist views or terrorism to be displayed within College premises and will remove any such material if it is found.

2.8.2 Likewise, we will seek to ensure that the College's printed and electronic communications (including its website) do not contain or support terrorist material or material likely to encourage terrorism and will investigate immediately if any such instances are raised.

2.9. Student Clubs/Societies

2.9.1 The College will work closely with any students organising student clubs.

2.9.2 There will be monitoring of events put on by students, particularly in relation to any controversial event proposed by any student.

2.9.3 Students leading on clubs/societies will be consulted on an ongoing basis on how we are implementing the Prevent Duty.

2.10. Information Sharing

2.10.1 The College is aware of the CHANNEL process and of the opportunities for informal and formal sharing of information with relevant authorities. We will use these when we consider it is necessary and appropriate to do so in the interests of preventing people being drawn into terrorism.

2.10.2 Information sharing will only take place with external authorities when this is consistent with the provisions of the [Data Protection Act](#).

3. Roles and Responsibilities

3.1. The CEO is responsible for providing the Board of Directors with assurance of the College's compliance with the Prevent Duty.

3.2. The Senior Management Team, led by the CEO, are responsible for approving the Prevent Policy and for approving the College's annual accountability and monitoring return to Falmouth University, in compliance with university requirements.

3.3. All members of staff should be aware of the College's responsibilities under the Prevent Duty and of the measures set out above to comply with it. Members of the College community who are concerned about a student who might be at risk of being drawn into terrorism should report this to their line manager or the relevant Student Services Manager. Concerns about members of staff who might be at risk of being drawn into terrorism should be reported to the COO, who may then escalate to the Senior Management Team and CEO. The Prevent Review Panel will determine if any concern needs to be referred to the local Prevent Lead.

3.4. Brighton and Hove:

Brighton and Hove City Council Prevent Lead/Co-ordinator:
Channel.Prevent@brighton-hove.gov.uk or call on 01273 291115.

To contact the Prevent team at the Counter Terrorism Police South East (CTPSE) send an email to SussexPrevent@thamesvalley.police.uk

3.5. Sheffield:

South Yorkshire Police Prevent Team using the quick and confidential [online tool to report possible terrorist activity](#) or ringing 101 (999 in emergencies). You can also call the Anti-Terrorist Hotline on 0800 789321.

You can call the national police Prevent advice line 0800 011 3764, in confidence, to share your concerns with specially trained officers.

Or
[Act Early website](#) (signposted by Sheffield City Council)



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