

## NFTS Prevent Policy

### Purpose

1. The [Counter Terrorism and Security Act 2015](#) places an obligation on all higher education institutions to consider the need to prevent individuals from being drawn into terrorism. This legislation is reinforced through the Prevent duty guidance for higher education institutions in England and Wales, known as the 'Prevent Duty.'
2. The purpose of this Policy is to provide a comprehensive overview of the requirements of the Prevent Duty and the School's strategies for compliance.
3. The NFTS is committed to maintaining a safe, welcoming and inclusive environment for all members of our community, whilst seeking to safeguard those that are vulnerable. It is within this context that we seek to balance the legal obligations placed upon us in the implementation of the Prevent Duty. The School must balance the requirements of Prevent with its core belief that the cultural, religious and ethnic diversity of its staff and students should be celebrated. We must also meet its legal and moral obligation to allow and promote academic freedom and free speech.
4. Further details on specific arrangements in place at the School can be found in the following policies and codes of practice:
  - [Safeguarding Policy](#)
  - [Freedom of Speech Code of Practice](#)
  - [IT Acceptable use Policy](#)
  - [Health and Safety Policy](#)
  - [Equality Diversity and Inclusion Strategy](#)
  - [Fitness to Study Policy](#)

### Scope

5. This Policy sets out the School's approach to the Prevent Duty and applies to all staff, students, apprentices, contractors, freelancers and visitors.
6. The activities of NFTS staff, students and apprentices taking place away from the School site will also fall within the Policy's scope if they are undertaking activities that are authorised by the School. This also includes all activities organised by the NFTS Students' Union.
7. The policy's scope intends to capture all interactions and activities associated with the NFTS community. This enables the School to proactively respond to potential risks, safeguard vulnerable individuals, and foster an environment that is safe, inclusive, and respectful of diverse viewpoints and backgrounds.

## Approach

8. Section 21 of the Counter-Terrorism and Security Act 2015 states that the authorities (including Higher Education institutions) subject to the provisions must have regard to this guidance when carrying out the duty. Prevent work is intended to deal with all kinds of terrorist threats to the UK.

The Prevent Duty has three specific strategic objectives:

- i. Tackle the ideological causes of terrorism;
- ii. Intervene early to support people susceptible to radicalisation;
- iii. Enable people who have already engaged in terrorism to disengage and rehabilitate.

9. The School aims to deliver the Prevent Duty through the following measures:

- **Working in Partnership**

The School actively works with partners including the Department for Education Regional Coordinator, and through this is involved in the sharing of good practice in approaches, and information where this is a necessity.

- **Leadership and Governance**

The Board of Governors has a statutory responsibility to ensure the School satisfies the requirements of the Prevent Duty, and this is fulfilled through oversight of Prevent matters by the Audit Committee.

On behalf of the Management team, the School has appointed the Registrar to be the Prevent Lead and the Quality Assurance Manager acts as the Prevent Coordinator.

- **Risk Assessment and Action Plan**

The School has developed a Prevent Risk Assessment of how and where students and staff might be drawn into terrorism, including violent and nonviolent extremism, and an associated action plan to mitigate risks. The Risk Assessment addresses the adequacy of institutional policies and arrangements regarding the School site and student welfare. The Risk Assessment and Action Plan is developed and reviewed by the Prevent Lead and shared with Management, Audit Committee and the Academic Standards Committee.

- **External and Visiting Speakers and Events**

A [Freedom of Speech Code of Practice](#) is in place relating to the management of School activities and events. The Code of Practice relates to all staff, students, apprentices, governors, freelancers and visitors to the School and clearly sets out the steps the School will take if it is assessed that an event or activity may not

comply with the School's Freedom of Speech Policy; balancing our legal duties in terms of both ensuring freedom of speech and academic freedom and protecting

student and staff welfare. More information can be found in the [Freedom of Speech Code of Practice](#).

- **Student Welfare and Wellbeing Support**

The School has in place a range of services for welfare and pastoral care through students' Heads of Department and through the Student Support and Wellbeing team. This includes counselling, mental health mentoring, financial and housing advice and help with addiction.

- **Staff Wellbeing Support**

All staff have access to the Employee Assistance Programme (EAP) which offers mental and emotional wellbeing support.

- **Training**

All staff in student facing roles receive Prevent training appropriate to their role, which is refreshed bi-annually. This raises awareness of the Prevent duty and its requirements, the arrangements that the School has in place to seek to prevent staff or students from being drawn into terrorism or victims of it and to understand the factors that make people support terrorist ideologies or engage in terrorist-related activity, and recognise vulnerability to being drawn into terrorism, and be aware of what action to take in response.

- **Students' Union**

Although the statutory Prevent duty does not directly apply to the Students' Union, as it operates as an independent entity, the School greatly values its cooperation in ensuring a safe and secure environment. All requests for external speakers made by the Students' Union are reviewed following the School's Freedom of Speech Policy and Code of Practice. All SU elected representatives are asked to complete Prevent awareness training, and are encouraged to report all concerns about a student potentially being at risk of being drawn into terrorism using the procedure outlined below.

- **IT Networks**

The School has in place an [IT Acceptable Use Policy](#), which applies to all use of School IT facilities. We set out in that policy a range of activities that would be of concern to us including issues that rise from the University's 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 or hate crime; to instructional information about any illegal activities.

### **Identification of Vulnerability and Risk**

10. This policy emphasises the importance of the ability to identify individuals who might be susceptible to radicalisation. However, it is crucial to understand that the presence of certain behavioural changes does not automatically denote radicalisation. All staff and students are expected to contribute to the security of the School community by being vigilant to behavioural changes such as:
  - Support for violent activities
  - Expressing sympathy towards extremist acts
  - Expressing extreme political or radical views
  - Making significant changes in their appearance or who they hang out with
  - Spending a lot of time alone
  - Having violent extremist literature or material about weapons, explosives, or military training.
  
11. Observing these behaviours does not necessarily mean an individual is being radicalised; they could also be signs of other personal issues or challenges. Therefore, the initial response should be to discuss the concerns about the individual with a focus on support and safeguarding with the School's Prevent Lead (see below for more detail on how to escalate a Prevent concern).
  
12. Individuals identified as potentially at risk within the School community will be considered for referral by the Prevent Lead either to the appropriate local authority (in the case of an under 18 or adult at risk) or to the Regional Prevent Coordinator or Police.

### **Procedures for dealing with Prevent concerns**

13. Any member of the School community who identifies behaviour, activity, or material that may be indicative of radicalisation or extremism is responsible for reporting it. This can be done through the "Support and Report" [form](#) available on the School's website and should be completed with as much detail as possible. Confidentiality will be respected to the greatest extent possible throughout this process. Alternatively, reports can be made direct to the Prevent Lead.
  
14. Upon receipt of a report, the Prevent Lead will conduct an initial review for referral consideration. The Prevent Lead may consult with other staff members as appropriate during this process. This review is to assess the potential risk and determine the appropriate next steps.
  
15. If the Prevent Lead determines the report to be credible and representing potential extremism or radicalisation, a more in-depth investigation will be conducted. This might involve interviewing the individual(s) involved, consulting with other staff or students, or liaising with external partners such as law enforcement or mental health professionals.

16. If the investigation indicates that an individual is at risk of being drawn into terrorism, the Prevent Lead will refer the case to the Regional Prevent Coordinator or to the Police.

**This Policy was approved in May 2024.**

**Date of next review: May 2026**



