

Prevent Duty Policy
UKPrevent02
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Introduction

1. The Prevent Strategy is statutory guidance issued by the UK Government under section of the Counter-Terrorism and Security Act 2015 (the Act). It is part of the overall counter-terrorism (CT) strategy, CONTEST. The aim of the Prevent Strategy is to reduce the overall threat to the UK from terrorism by stopping people becoming terrorists or supporting terrorism. In the Act, this has been expressed as having “*due regard to the need to prevent people from being drawn into terrorism*”, also known as the Prevent Duty.
2. CONTEST is split into four workstreams that are known within the CT community as the “four P’s”:
 - **Prevent:** The purpose of Prevent is to stop people from becoming drawn into or supporting terrorism. This includes countering terrorist ideologies and challenging those who promote it; supporting individuals who are especially vulnerable to becoming radicalised; and working with sectors and institutions where the risk of radicalisation is assessed to be high.
 - **Pursue:** The purpose of Pursue is to stop terrorist attacks by detecting, prosecuting and otherwise disrupting those who plot to carry out attacks against the UK.
 - **Protect:** The purpose of Protect is to strengthen protection against a terrorist attack in the UK. The work focusses on border security, the transport system, national infrastructure and public places.
 - **Prepare:** The purpose of Prepare is to mitigate the impact of a terrorist attack where that attack cannot be stopped. This includes work to bring a terrorist attack to an end and to increase the UK’s resilience so we can recover.
3. The Prevent Strategy has three specific strategic objectives:
 - respond to the ideological challenge of terrorism and the threat we face from those who promote it;
 - prevent people from being drawn into terrorism and ensure that they are given appropriate advice and support; and
 - work with sectors and institutions where there are risks of radicalisation that we need to address.
4. Terrorist groups often draw on extremist ideology, developed by extremist organisations. Some people who join terrorist groups have previously been members of such organisations and have been radicalised by them. The UK Government defines extremism in the Prevent Strategy as: “*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*”.
5. Hult has a legal and regulatory responsibility to ensure the Prevent Duty is adhered to in accordance with provisions in the Act and this Policy sets out how it assures compliance. This Policy is implemented by the following documents:
 - The Prevent Duty Procedure

- The Prevent Duty Guidance
- External Speakers and Events Procedures
- Safeguarding Policy
- Safeguarding Procedure
- Freedom of Speech and Academic Freedom Statement
- Freedom of Speech and Academic Freedom Code of Practice

Ownership

1. The Executive sponsor of this Policy is the General Counsel. The officers responsible for this Policy is the Quality Assurance Manager (Prevent Lead) and the Head of Student Wellbeing (Deputy Prevent Lead).
2. Every member of staff at Hult is an active Prevent Coordinator on campus and has a responsibility to identify concerns and raise them with the Prevent Lead.
3. Prevent Steering Committee membership includes:
 - Quality Assurance Manager (Prevent Lead, Deputy Designated Safeguarding Lead)
 - Campus Dean (as appropriate)
 - Director of Campus Life (as appropriate)
 - Student Wellbeing and Counselling Manager (Deputy Prevent Lead, Designated Safeguarding Lead)
 - General Counsel
4. Hult has established a Prevent Steering Committee to consider, in detail, how the School should best implement the Prevent Duty. Members of the Prevent Team will be selected to participate in the committee meetings as appropriate.
5. The Prevent Steering Committee's responsibilities, as set out in the terms of reference, are as follows:
 - Risk assessments
 - Implementing action plans
 - Training
 - Monitoring
 - Reviewing
 - Reporting
6. Individual Roles and Responsibilities
 - The Prevent Team is responsible for the day to day implementation of the Prevent Duty and for providing an ethos which upholds the core values of shared responsibility and wellbeing for all students, staff, faculty and visitors and promotes respect, equality and diversity, and understanding. The Prevent Lead is also responsible for ensuring that all relevant communications and training advance the principles of this policy as well as ensuring referrals are made promptly and effectively.

- Campus Dean (or designee) is responsible for organising faculty mandatory training.
- Director of Campus Life is responsible for organising staff mandatory training.
- General Counsel is responsible for overall compliance with the Prevent Duty and its monitoring mechanisms.

Freedom of Speech and Academic Freedom

1. Hult is cognisant of our obligation to promote academic freedom and freedom of speech under the Education Act 1986 and the Higher Education (Freedom of Speech) Act 2023, while carrying out our Prevent Duty to protect student and staff wellbeing.
2. Hult enshrines the principle of academic freedom and freedom of speech in its Faculty Handbook and Staff Handbook.

External Speakers and Events

1. The approval of external speakers and the use of premises will not be denied on the grounds of policy, belief or lawful speech.

The guidelines for organizing and assessing external speakers and events are set forth in the External Speakers and Events Procedures.

Prevent Duty and the Acceptable Use of IT

1. Hult is focused on preventing the online manifestation of extremism and radicalisation through the robust promotion of e-safety mechanisms such as usage monitoring, firewalls and similar security measures. The School assures this through the Information Security and Acceptable Use Policy. The following uses are defined as unacceptable use of the School's IT facilities in accordance with The Prevent Duty:
 - Accessing or creating any terrorist related or extremist material, or any data capable of being resolved into such material as per The Prevent Duty.
 - Accessing or creating any illegal, obscene or indecent images, data or other material, or any data capable of being resolved into such material.
 - Accessing or creating any material which illegally discriminates or encourages discrimination.
 - Accessing or creating material which the School deem to be advocating, inciting or encouraging illegal activity, threatening, harassing, defamatory, bullying or disparaging of others, abusive, libellous, slanderous, indecent, obscene, deliberately causing offense, annoyance, inconvenience or anxiety.
2. For further information on what is deemed acceptable and unacceptable use, please refer to the Information Security and Acceptable Use Policy.

Training and Development

1. All Hult campus staff in the UK are required to complete Prevent Duty training and familiarise themselves with the means to identify and refer people they believe are at risk of radicalisation. This training is part of the compulsory induction process for all new staff and must be completed within one month of joining Hult. The Prevent Lead actively monitors completion of the training in conjunction with the People and Culture team. Staff are also requested to complete mandatory annual refresher training on the Prevent Duty.

Referrals

1. It is the responsibility of all staff to raise a Prevent related concern with the Prevent Lead at the earliest convenient time. Making a referral is not an indicator of wrongdoing or that there is a risk, but it means that the cause for concern can be appropriately investigated and corrective measures can be implemented as necessary.
2. The Prevent Lead will investigate the matter internally to identify the risk and the outcome of this process will either result in external referral (there is a cause for concern) or the situation to be managed internally (there is not a cause for concern).
3. In the absence of the Prevent Lead, the concern must be raised with an alternative member of the Prevent Steering Committee.