PREVENT Policy

Contents

This policy applies to Navitas Careers & Industry ("C&I") and SAE Education Limited staff employed in the UK (henceforth referred to as "SAE UK") and reflects current UK legislation and will be updated in line with any legislative changes.

1. Introduction

SAE Institute has a duty to have due regard to the need to prevent people, staff and students against the risk of radicalisation and being drawn into terrorism.

It believes that individuals being drawn into terrorism is a form of harm and accepts the obligations arising from the PREVENT legislation as an important element of its general duty to protect its staff and students from all forms of harm.

The requirements of PREVENT must be balanced with the core belief that cultural religious and ethnic diversity should be celebrated. It must also meet the legal and moral obligation to allow and promote academic freedom and free speech which are vital elements of a successful academic community.

2. Policy purpose, scope and application

2.1 Purpose

The purpose of this policy is to outline the role and responsibility the Institute undertakes in light of the Government's Counter Terrorism and Security Act 2015, hereafter referred to as PREVENT, and in conjunction with the PREVENT Duty Guidance for higher education institutions in England and Wales, which came into effect on 18 September 2015, will outline the ways in which these responsibilities will be met.

2.2 Scope

The PREVENT policy and duty applies to all in the Institute's community; staff, including contractors, visitors, external speakers and those working under self-employed arrangements, and students.
- All persons (whether academic staff or otherwise) whose normal place of work is on the premises of one or more of the UK campuses.
- All registered students at the SAE Institute UK (whether full-time or part-time).
- All bodies or persons not associated with SAE who hire or otherwise use the Institute's facilities.

The activities of staff and students which take place away from the Institute's premises will also fall within the policy if they are undertaking activities which are or perceived to be associated with the Institute.

2.3 Application

Every manager and staff member has a personal responsibility to understand this policy. The Leadership Team and management have a responsibility for implementing this policy and commit to ensuring that a consistent approach is adopted at all times. Training is provided to support staff in their responsibilities.

3. Key principles

PREVENT is part of the government's counter-terrorism strategy and aims to do three things:

1) Respond to the ideological challenge of terrorism and the threat faced by the UK from those who promote it.
2) Prevent people from being drawn into terrorism and ensure they are given appropriate advice and support.
3) Work with a wide range of sectors, including education, criminal justice, faith, charities, local authorities where there are risks of radicalization which need to be addressed.

The Institute accepts its responsibility to have due regard to the need to prevent people from being drawn into terrorism. It will ensure that any changes to operational polices, guidelines, processes, systems or working practices will ensure PREVENT compliance and align with the following core PREVENT principles:

1. **Safeguarding**: The Institute aims to prevent any vulnerable individuals from being drawn into terrorism and will raise any incidents as a safeguarding issue with the Campus Director.

2. **Staff awareness:** Staff will be made aware of the general requirements of PREVENT during induction to ensure that they remain sensitive to the cultural, religious and ethnic diversity of the academic community.

3. **Senior accountability**: The Dean of the Institute will maintain a risk register and monitor the institutional risk of students/ staff being drawn into terrorism. A designated senior member of staff will be assigned lead responsibility in this policy for all PREVENT related policies and measures.

4. **Celebrating diversity:** The culturally diverse nature of the Institute will be celebrated and promoted to counter the threat of radicalisation from external influences.

5. **Information sharing:** Some internal and external information sharing will be necessary under appropriately controlled conditions and on a needs and case by case basis.

6. **Academic freedom:** The ability of students and staff to teach and debate any topic will not normally be fettered unless on a case by case basis, a specific threat is identified or a clear PREVENT requirement exists.

7. **Free speech:** Policies relating to the management of events, speakers and the display of posters and other promotional material must balance the obligation to enable free speech - with the requirements of PREVENT.

8. **Social media**: Social media, as a medium for communication, social interaction and debate, will be monitored with the lens that it may be a vehicle by which vulnerable individuals are particularly susceptible to radicalisation.

10. **Website Filtering**: The Institute will block access to specific websites, network resources and IP addresses that provide or facilitate access to extremism materials. Staff and students should remain vigilant to the signs of potential radicalisation and report any concerns to their Campus Director.

11: **Partnerships**. The Institute will work in partnership with statutory agencies, other HEIs, local authorities and other bodies to assess and respond to the risk of people being drawn into terrorism.

4. Policy guidelines

1. Leadership Governance

The UK Regional Leadership Team and Board of Directors support and practice the Institute's approach to uphold core values, shared responsibility and wellbeing for all staff, students and visitors, whilst promoting respect, equality, diversity and understanding.

This leadership is the vehicle through which ongoing reflection and enhancement of PREVENT compliance takes place. The General Manager for the region is identified as the Operational PREVENT Lead.

The implementation of the PREVENT Duty and with regular review by the Leadership Team, in line with Prevent annual reporting compliance.

2. Welfare and Pastoral Care

The Institute takes its role in supporting the welfare of its students and staff seriously.

- Pastoral care is available to students in a variety of ways which are outlined in the Pastoral Support Policy.

- Line Manager responsibilities to their staff, and those in their jurisdiction are laid out in the Employee Code of Conduct.

The Institute will seek to accommodate the needs of all faiths. Any such need will be established prior to the student/ staff commences their respective studies/ duties and formalised during their induction week. The campus will make every effort to make reasonable adjustments to meet the needs of the individual. The decision ultimately will lie with the respective Campus Director. If any on-site alterations to meet an individual's need cannot be made, suitable alternatives will be provided and discussed with the individual.

All staff and students should be aware that, should they have concerns regarding the wellbeing of a student or staff member, they can raise these in confidence with the relevant staff contact and/ or Campus Director.

Channel referrals are an element of our internal escalation process and will be utilised if the following conditions are met:

- **ENGAGEMENT -** Is there any information to indicate that this individual is showing any signs of becoming involved with a group, cause or ideology that justifies the use of violence and other illegal conduct in pursuit of its objectives?

- **INTENT -** Is there any information supporting that this individual has indicated that they may be willing to use violence or other illegal means?

- **CAPABILITY -** Is there any information supporting what this individual may be capable of doing?

3. Risk Assessment and Reporting

The Regional Leadership Team will regularly review the risk of students being drawn into terrorism, and where any significant risk is identified, will consider what action might mitigate the impact/ likelihood of that risk crystallising.

4. Working in Partnership

To ensure effective compliance and overview of our monitoring procedures, each Campus will ensure ongoing and regular contact with their respective Prevent Duty Liaison within their local authority.

5. External Speakers and Events

This Policy also applies to all meetings and events within the Institute which are arranged by staff or students but outside normal academic activity and which involve external speakers not associated with the Institute.

The External Speaker and Events policy and External Speaker Code of Conduct reflect the PREVENT Duty and sets out how we will ensure that it meets different legislative requirements and commitment to protect academic freedom under the Education (No. 2) Act 1986.

The Marketing team and Campus Directors are responsible for assessing whether there are any major risks or issues in the context of PREVENT and freedom of speech. Should any concern be raised over a speaker or the speaker's affiliation or previous work, the decision can be escalated for approval to the General Manager and Dean.

In complying with the PREVENT obligations, SAE Institute will not:

- Provide a platform for any terrorist organisation or permit the encouragement of terrorism in any way.
- Allow segregation based on sex or gender, or discrimination of any kind at any event held on its premises.

6. Staff Training

All SAE staff carry out initial PREVENT training during their induction.

7. IT Network

We consider it unacceptable for our IT networks to be used in any way that supports, promotes or facilitates terrorism. Our IT Department regularly conduct web filtering across all campuses to safeguard our staff and students against questionable or illegal content that might cause distress, harm or encourage undesirable activity which contravenes either SAE policy, Government (i.e. PREVENT Duty) and UK law as outlined in the Information Technology, Network Usage and E-mail Policy.

SAE Institute UK takes the challenges presented by social media very seriously. If any misuse of the Institute's branded social media accounts is discovered, action will be taken in accordance with the terms and conditions of the relevant platform for its removal. The staff member and student will be referred to the code of conduct and appropriate action will be taken.

8. Communications

We will not permit material supporting terrorism to be displayed within our premises and will remove any material. Likewise, we will seek to ensure that our printed and electronic communications (including the SAE website and social media channels) do not contain or support terrorist material or material likely to promote radicalisation and violent extremism, and will investigate immediately if any such instances are raised.

It is acknowledged that there may be legitimate reasons to use materials relating to terrorism as part of legitimate teaching and research activities. If such an occasion should arise, staff and students must seek approval from the respective Campus Director and General Manager.

5. Approval policy

This Policy is fully supported by the ELT and SAE UK Board of Directors.

6. Related policies

Please see the following policies for more information:
- External Speaker and Events Policy
- External Speaker Code of Conduct
- Code of Conduct
- Information Technology Network Usage and E-mail Policy
- Pastoral Support Policy

7. Further assistance

If you have any questions or require further assistance, please discuss with your Campus Director.

8. Revision history
Version Control

Issue Date:	Summary of Changes	Review Date
January 2015	New policy	June 2016
December 2016	Policy review	December 2018
November 2020	Rebranding and review	November 2021

9. Document protocol

Document I.D.	PREVENT Policy
Responsibility	Dean, SAE UK
Initial Issue Date	January 2015

End