

## **PREVENT DUTY GUIDANCE**

This document sets out guidance on Falmouth University's and FX Plus's Policy in relation to the Prevent Duty. It should be read in conjunction with the Prevent Duty Policy.

**ORGANISATION: Falmouth University (Falmouth) and Falmouth Exeter Plus (FX Plus)**

**APPLIES TO: All staff and students**

**POLICY OWNED BY: David Dickinson, Director of Student & Academic Support**

**REQUIRED CONSULTEES:**

**Prevent Partnership Group**

**University Management Committee (Falmouth)**

**Senior Leadership Team (FX Plus)**

**People & Culture**

**Student Wellbeing Support**

**Executive Director of Estates, Operations and Planning (Falmouth)**

**Executive Director of FX Plus**

**APPROVED BY:**

**University Management Committee (Falmouth)**

**Senior Leadership Team (FX Plus)**

**DATE APPROVED: UMC: 26 July 2024; SLT: 17 October 2024**

**REVIEW DATE: July 2028**

## PREVENT DUTY GUIDANCE

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### PURPOSE

- 1 The Counter Terrorism and Security Act 2015, updated in the Prevent duty guidance for England and Wales (2023), places a duty on all universities to have a due regard to the need to prevent people from being drawn into terrorism. This is known as the Prevent Duty. This document combines Policy and Procedure to provide an overview of Falmouth's and FX Plus's Policy in relation to the Prevent Duty.

### SCOPE

- 2 The Policy applies to all students (including on short, and non-credit bearing courses) and to all individuals undertaking the work of Falmouth and FX Plus, including directly employed staff, contractors, volunteers, and those engaged through a third-party employer such as agency staff.
- 3 The University values freedom of speech and academic freedom as essential components of higher education and take reasonably practical steps to secure these freedoms for their members and visitors. The Prevent Duty does not constrain the entitlement of relevant staff to academic freedom within the law to question and test received wisdom, and to put forward new ideas and controversial or unpopular opinions, without placing themselves in jeopardy of losing their jobs or privileges. However, these freedoms are not absolute and come with responsibilities. The University will not permit activities or expressions on their premises or under their auspices that constitute a criminal offence or are otherwise unlawful, and specifically in relation to the Prevent Statutory Duty that risk drawing people into terrorism (whether in a physical or virtual environment). Such activities or expressions will be considered a serious disciplinary offence and may also be considered unlawful.
- 4 The University of Exeter shares a campus and services with Falmouth University, and its Prevent Duty arrangements are governed via a separate Policy.

### KEY DEFINITIONS

- 5 The Government's Prevent Duty guidance includes the following definitions:
  - 5.1 **Terrorism** – is the use or threat of serious violence against a person or serious damage to property or systems where that action is designed to influence the government or an international

governmental organisation or to intimidate the public or a section of the public; and for the purpose of advancing a political, religious, racial or ideological cause.

- 5.2 **Extremism** - is 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.
- 5.3 **Ideology** - a terrorist 'ideology' is a set of beliefs, principles, and objectives to which an individual or group purports to adhere and attempts to instill in others to radicalise them towards becoming terrorists or supporting terrorism. There are several concepts or 'tools' that often feature in terrorist and extremist ideologies, including: narrative, propaganda, grievances, and conspiracy theory.
- 5.4 **Permissive environment** - A permissive environment is characterised as being tolerant of behaviour or practices strongly disapproved of by others, such as an environment where radicalising ideologies are permitted to flourish. Radicalisers create and take advantage of permissive environments to promote or condone violence and to spread harmful ideologies that undermine our values and society. Permissive environments can exist both online and offline.
- 5.5 **Radicalisation** - is the process of a person legitimising support for, or use of, terrorist violence.

## RELATED DOCUMENTS

- 6 This document should be read in conjunction with the following Falmouth / FX Plus Policies:
  - 6.1 **Cause for Concern [Procedure](#)** – this sets out the procedures and key contacts that staff should be aware of should they have concerns about students (see section 7 and Appendix 1).
  - 6.2 **Freedom of Speech and Lawful Assembly [Policy](#)** – Freedom of Speech and Lawful Assembly Policy – This sets out the policy for ensuring and actively promoting freedom of speech and academic freedom within the law for University students, staff and visiting speakers. It aims to foster an environment where open discussion and the free exchange of ideas can flourish, balanced with the need to prevent unlawful speech, radicalisation, hostility, harassment, and intimidation, and to ensure public safety and lawful conduct on University premises and in relation to University activities (on campus, off campus and online).
  - 6.3 **Code of Conduct for Falmouth and [FX Plus](#)** – this sets out the standards of conduct that are expected of staff, including appropriate

conduct in relation to the expression of personal views.

- 6.4 **Disciplinary Procedures for Falmouth, [FX Plus](#) and [Students](#)** – this sets out the policy and procedures where there has been a failure to meet or maintain the required standards of conduct.
- 6.5 **Safeguarding [Policy](#) and [Guidance](#)** – this sets out Falmouth’s approach to protecting children and vulnerable adults who may be present in the University environment.
- 6.6 **Prevent Statutory Duty and Events Involving External Speakers [Procedure](#)** – which sets out the requirements for arranging events involving external speakers (in-person, or online).
- 6.7 **[Staff](#), [Student](#) and [Guest](#) IT Acceptable Use Policies** – which detail arrangements regarding computer use and monitoring.

## THE APPROACH TO THE PREVENT DUTY

- 7 It is the Policy of Falmouth and FX Plus to comply fully with the requirements of the Prevent Duty, specifically to take suitable, sufficient, and proportionate steps to:
  - 7.1 prevent any member of the University community from being drawn into terrorism as part of identifying and helping vulnerable students and staff and ensuring the safety and wellbeing of students, staff and the wider community; and to achieve this while
  - 7.2 protecting academic freedom and general freedom of expression within the law; and
  - 7.3 ensuring that the principles of equality and diversity are preserved in all aspects of University life.
- 8 The overall approach to meeting the Prevent Duty is to ensure the requirements of the Prevent Statutory Duty are sufficiently and effectively delivered in a way which is proportionate, sustainable, suitable, and forms part of the ways in which Falmouth and FX Plus may identify and help vulnerable students and staff. This is overseen for the Falmouth Exeter partnership by a Prevent Partnership Group which includes representatives from both universities and the SU, as well as FX Plus staff. It is chaired by the Director of Student & Academic Support.
- 9 The legislation holds the university partners, as Relevant Higher Education Bodies, accountable for fulfilling the obligations of the Statutory Duty. The remit of the Partnership Group is to support and

facilitate the universities in fulfilling these responsibilities, and in complying with the monitoring regime.

- 10 The Duty requires each specified authority to have a designated person in a leadership position who is responsible for overseeing Prevent delivery, including ensuring that relevant staff have appropriate training and induction. At Falmouth and FX Plus this is the Director of Student & Academic Support.
- 11 The Duty also recognises effective partnership as a key component of delivering Prevent. Falmouth and FX Plus work closely with local Prevent leads, the Police, and local authorities, through multi-agency forums, such as Safer Cornwall, and regular liaison with the Police Prevent/CT team. DfE and Police representatives are invited to attend meetings of the Prevent Partnership Group.
- 12 The Duty requires specified authorities to have proportionate and appropriate capabilities to manage risk. A Risk Assessment is maintained and updated three times per year by the Prevent Partnership Group, which monitors the implementation of actions arising. This Risk Assessment is informed by information provided by DfE and Police representative, including the Counter Terrorism Local Profile.
- 13 The role of the Students' Union (SU) is recognised. The SU is represented on the Prevent Partnership Group, and relevant policies and procedures are aligned between the University/FX Plus and the SU (e.g., in relation to External Speakers, and Staff Training).
- 14 Falmouth and FX Plus have implemented policies relating to the appropriate use of IT equipment and networks, which contain specific reference to the Prevent duty and internet monitoring (via Fortigate) is implemented as a means of restricting access to harmful content. The Director of Infrastructure is responsible for ensuring these are in place.
- 15 A key element of the Duty is the measures in place to prevent University physical or digital facilities being exploited for unlawful purposes, Falmouth and FX Plus manage this through a Prevent Statutory Duty and Events Involving External Speakers Policy, which also pays due regard to the need to preserve freedom of speech and academic freedom.
- 16 Falmouth and Exeter are required to report annually to the OfS in relation to Prevent duty compliance. FX Plus provides assistance with this through provision of data, reporting, and (where agreed) submission on behalf of the institution. The Director of Student & Academic Support is responsible for supporting this.

## STAFF RESPONSIBILITIES

- 17 Staff are required to understand the types of behaviours that may result in cause for concern about a student's general welfare, including the factors that lead people to support terrorist ideologies or engage in terrorist activity, the specific behaviours that may indicate a cause for concern, and the action to take in response (including internal referral arrangements). Mandatory training is provided to support staff in meeting this responsibility (see section 27-28).
- 18 Staff are responsible to report any concerns in relation to colleagues, students, or others in line with sections 23-25.
- 19 The Prevent Statutory Duty should in no way stop ideology, terrorism or extreme views being discussed or debated within the University environment. The Prevent Duty does not constrain the entitlement of relevant staff to academic freedom within the law to question and test received wisdom, and to put forward new ideas and controversial or unpopular opinions, without placing themselves in jeopardy of losing their jobs or privileges. However, these freedoms are not absolute and come with responsibilities. The Universities will not permit activities or expressions on their premises or under their auspices that constitute a criminal offence or are otherwise unlawful, and specifically in relation to the Prevent Statutory Duty that risk drawing people into terrorism (whether in a physical or virtual environment). Such activities or expressions will be considered a serious disciplinary offence and may also be considered unlawful.

## REPORTING CONCERNS

- 20 Staff are required to report any concerns that they may have that someone in the University community is potentially being drawn into a terrorist ideology or is vulnerable and susceptible to radicalisation. Staff are also required to report concerns in relation to the creation or exploitation of a permissive environment (see 5.4 above).
- 21 Some of the behaviours which may appear as signs of a potential radicalisation may also be signs of a wide range of other support needs on the part of that individual. Falmouth and FX Plus aim always to respond to concerns in a robust and timely way, whilst also being sensitive and proportionate to the context and individuals' needs.
- 22 **Emergency Situations**  
In the rare event that an individual's behaviour may present an immediate and imminent risk of harm to themselves or others, the emergency services should be contacted by dialling 999. Whenever the emergency services are contacted from University premises, where it is safe to do so, this call should be followed up by alerting Campus

Safety & Support (via the SafeZone app) to alert them that the emergency services have been contacted so that they can direct them to the necessary building.

**23 Concerns about Students**

Where the concern is not in relation to an immediate risk and relates to a student at Falmouth, the FX Plus Student Wellbeing Support Team should be contacted via [StudentSupportAdmin@fxplus.ac.uk](mailto:StudentSupportAdmin@fxplus.ac.uk) or by calling 01326 255341. Student Wellbeing Support will respond to the concern in line with the Cause for Concern process (see Appendix 1) and arrange a Prevent Risk Assessment Panel where necessary to determine the level of risk and appropriate action to address any risk or misconduct. Student Wellbeing Support may seek advice as appropriate from relevant external agencies.

Note: the same general process is also applied to responding to concerns regarding University of Exeter students.

**24 Concerns about Staff Members**

The process for reporting and managing concerns about staff members relating to Prevent is set out in the flowchart at Appendix 2. Concerns should be reported to the Executive Director of People & Culture via [hrrservices@falmouth.ac.uk](mailto:hrrservices@falmouth.ac.uk) (or nominated deputy) who will liaise with Student Wellbeing Support to determine what risk assessment, mitigation and referral actions may be necessary. Additionally, the Executive Director of Estates, Operations and Planning (Falmouth) or the Executive Director (FX Plus) will determine with the staff member's line manager what action, if any, may be necessary under Falmouth's or FX Plus's Disciplinary Policy. The relevant Executive Director (or nominated deputy) will be responsible for overseeing the case, accessing advice from Student Wellbeing Support as necessary.

**25 Concerns about other people (not current staff or students)**

Where the concern is not in relation to an immediate risk, the FX Plus Student Wellbeing Support Team should be contacted via [StudentSupportAdmin@fxplus.ac.uk](mailto:StudentSupportAdmin@fxplus.ac.uk) or by calling 01326 255341. Student Wellbeing Support will respond to the concern in line with the Cause for Concern process (see Appendix 1) and seek advice as appropriate from relevant external agencies.

## **CONFIDENTIALITY**

- 26 All information relating to reported concerns will be treated confidentially. In some instances, it may be necessary and proportionate to share some personal information with partner agencies as part of the risk assessment and referral processes. Such information sharing will be assessed on a case-by-case basis, taking into consideration -the necessity and proportionality of sharing the

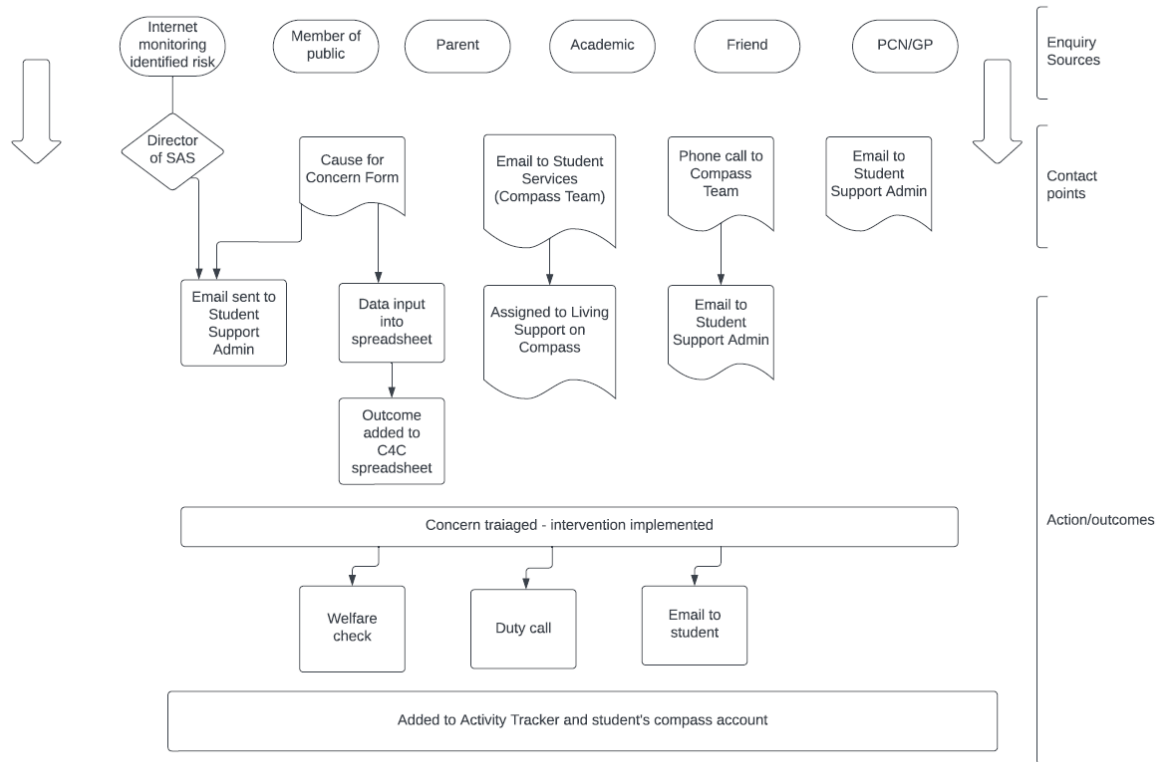
information, whether it is possible to obtain consent for the information to be shared, and relevant legislation such as the Data Protection Act and the Human Rights Act.

## **TRAINING**

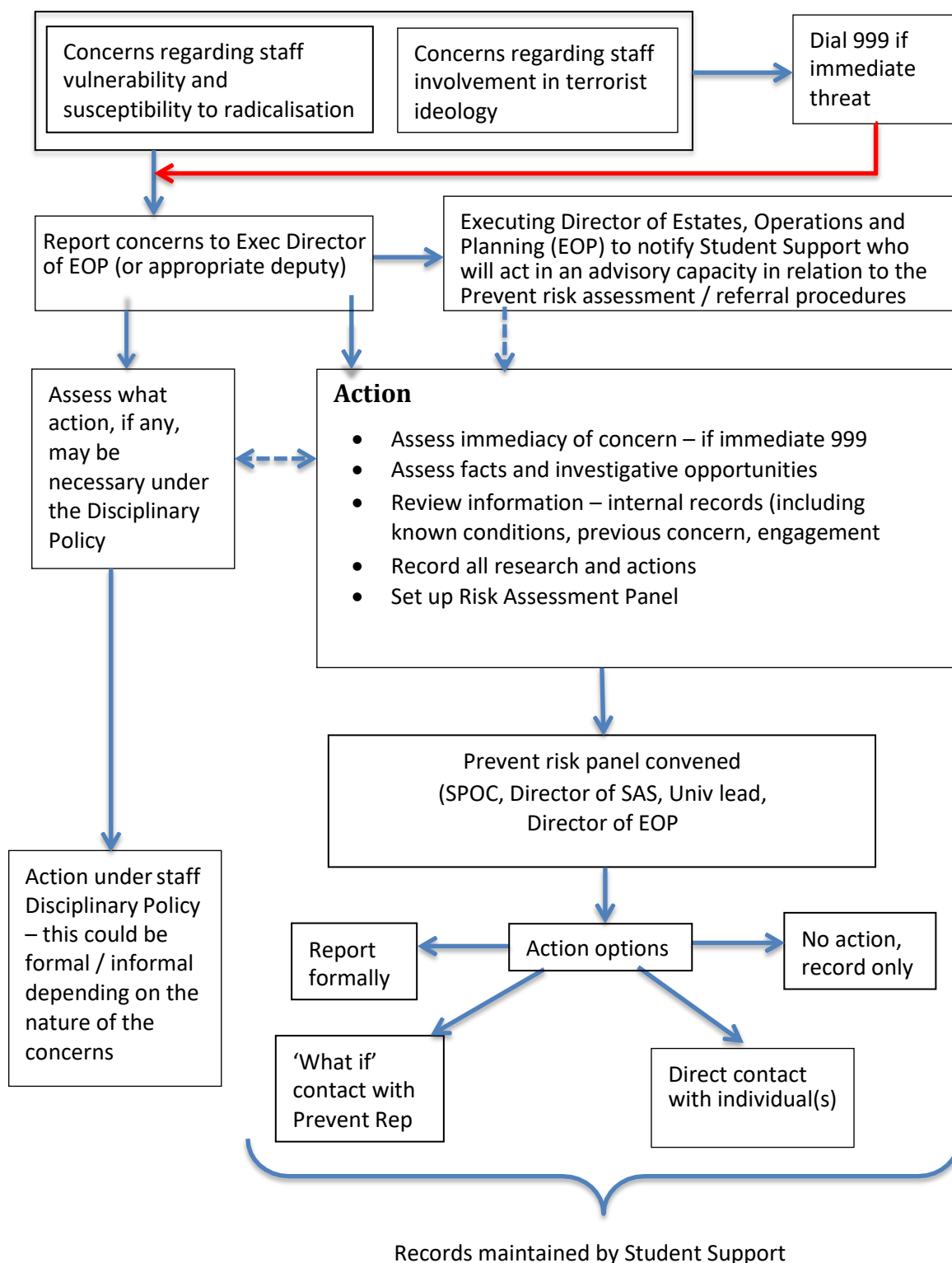
- 27 The Director of People & Culture is responsible for ensuring that suitable and sufficient Prevent Duty training is made available on a mandatory basis to all staff, and that appropriate additional training is also provided to staff in certain key roles (e.g., student facing staff in Student Support, Chaplaincy or Campus Safety & Support).
- 28 The training plan aims to encourage a consistent and proportionate level of awareness of the Prevent Duty as part of the wider safeguarding agenda. The Prevent Training and Competencies Framework provides clarity on the level of training required for staff at Falmouth University and FX Plus. It provides for level 1 (mandatory) online e-learning training for all staff, and more detailed training for those with more significant student facing responsibilities (e.g., Campus Safety & Support, Student Wellbeing Support, etc). For more information on training available see the Staff Development page of the HR SharePoint site – [Falmouth](#), [FX Plus](#).



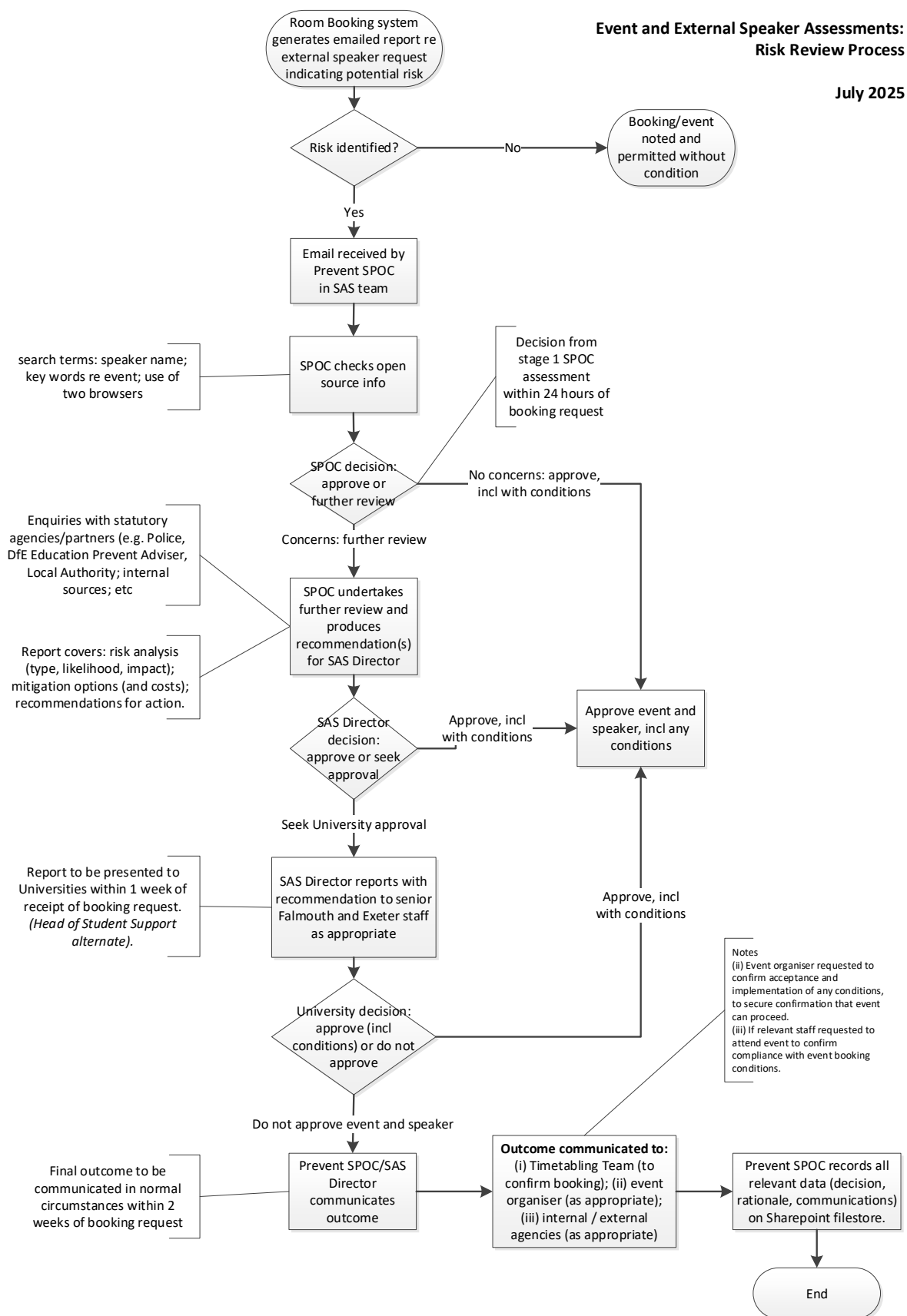
## **Appendix 1: Flowchart regarding Reporting and Managing Concerns in Relation to Students**



## **Appendix 2: Procedure for Reporting and Managing Concerns in Relation to Staff**



## Appendix 3: Procedure for Reviewing External Speaker Requests



## Appendix 4: Procedure for Reviewing Web Access Trigger Requests

