Prevent Policy

Document Control:

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Amendment History:

Version Number	Effective Date	Summary of Amendments	Author
[V3.0]	[26/06/2025]	Ensured alignment with changes in law around freedom of speech and added the External Speaker Policy/ Risk Assessment Form.	Jemma Ansell, Deputy Designated Safeguarding Lead
[V3.1]	[19/11/2025]	Updated contact details.	Sophie Harris, Deputy Designated Safeguarding Lead
[V3.2]	[24/03/2026]	Updates in alignment with latest external guidance and trends aligning with our internal framework using 2023 Prevent Duty Guidance, the March 2024 extremism definition, and the 2025 Terrorism (Protection of Premises) Act (Martyn's Law). Update to contact details.	Julia Bindley, Designated Safeguarding Lead
[V4.0]	[15/10/2026]	Annual review. Aligned with updated Safeguarding, Health	Sean Thomson, Deputy Designated

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		and Safety and Online Safety Policy. Updated to reflect Key Principles of Prevent (February 2026), Notice, Check, Share (August 2026), the DfE practical guidance for designated safeguarding leads (September 2026), the Higher Education (Freedom of Speech) Act 2023, the OfS Prevent monitoring framework (from 1 January 2027), the Crime and Policing Act 2026, the Children's Wellbeing and Schools Act 2026 and the Data (Use and Access) Act 2025. Protective security arrangements now cross-referred to the Health and Safety Policy. Terminology updated from "vulnerable" to "susceptible to radicalisation".	Safeguarding Lead

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1. Introduction & Context

1.1 Prevent is a part of the Government's counter-terrorism strategy (CONTEST). Prevent sets out to stop individuals from becoming terrorists, supporting terrorism, or being drawn into radicalisation and extremism.

Under section 26 of the Counter-Terrorism and Security Act 2015, Multiverse, as a provider of further and higher education, must have due regard to the need to prevent people from being drawn into terrorism (the Prevent duty). In practice, this means recognising the risk of radicalisation as part of our safeguarding responsibilities, responding proportionately to concerns, and referring individuals to Prevent where appropriate. This policy is part of Multiverse's wider safeguarding arrangements and should be read alongside the Safeguarding Policy.

1.2 The Prevent Duty Guidance (2023) sets out three objectives for Prevent:

1.2.1 Tackling the ideological causes of terrorism, including by reducing permissive environments in which ideologies that can lead to terrorism are able to spread.

1.2.2 Intervening early to support people who are susceptible to radicalisation.

1.2.3 Enabling people who have already engaged in terrorism to disengage and rehabilitate.

1.3 Legal and Regulatory Framework:

This policy is based on the law and guidance listed in section 1.2 of the Safeguarding Policy. The following apply specifically to Prevent:

- Counter-Terrorism and Security Act 2015 (Part 5, including the Prevent duty and Channel)
- Prevent Duty Guidance: for England and Wales (Home Office, 2023)
- Key Principles of Prevent (Home Office, February 2026)
- Notice, Check, Share (Home Office, August 2026)
- The Prevent duty: practical guidance for designated safeguarding leads (Department for Education, September 2026)
- Channel Duty Guidance (Home Office)
- Higher Education (Freedom of Speech) Act 2023 and Office for Students (OfS) Regulatory advice 24
- OfS Prevent duty framework for monitoring in higher education in England
- Crime and Policing Act 2026
- Terrorism (Protection of Premises) Act 2025 (see section 11)

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2. Purpose of the Prevent Policy

2.1 This policy should be read in conjunction with the Safeguarding Policy, Online Safety Policy, Health and Safety Policy, External Speakers Policy and Risk Assessment, Safer Recruitment Policy and the Managing and Escalating Prevent Concerns SOP and has the following aims:

2.1.1 To promote and reinforce a set of shared values, founded on tolerance and respect for others.

2.1.2 To create a safe space for free and open debate, in which lawful views (including views that some may find controversial or offensive) can be expressed and challenged, while not permitting unlawful speech, such as speech that encourages terrorism or violence, or that amounts to harassment.

2.1.3 To promote a sense of community cohesion both within Multiverse and within its wider external community.

2.1.4 To ensure that learners are safe and that we reduce permissive environments, and create a space that is free from bullying, harassment, and discrimination.

2.1.5 To identify and support learners who may be susceptible to radicalisation, and to refer or signpost them to appropriate support.

2.1.6 To ensure that staff are aware of their responsibilities under this policy and can recognise and respond to concerns about learners who may be susceptible to radicalisation, and report any concerns in a timely manner.

2.1.7 To provide proactive and tailored support to learners who may be at greater risk of harm (as set out in the Safeguarding Policy), including care leavers and learners with Additional Learning Needs (ALN) and/or disabilities, including neurodivergent learners and those with mental health conditions, recognising that radicalisers may seek to exploit isolation, grievance or a search for identity and belonging.

3. Definitions

3.1 Radicalisation: The process by which a person comes to support terrorism and forms of extremism leading to terrorism. It can involve the adoption of increasingly extreme beliefs and behaviours. It is important to remember that holding dissenting views, expressing political or religious opinions is not the same as being radicalised.

3.2 Extremism: "The promotion or advancement of an ideology based on violence, hatred or intolerance, that aims to: (1) negate or destroy the fundamental rights and freedoms of others; (2) undermine, overturn or replace the UK's system of liberal parliamentary democracy and democratic rights; or (3) intentionally create a permissive environment for others to achieve these results." (Revised Government definition, March 2024). This definition is non-statutory. It does not change the law

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and does not restrict lawful expression: holding or expressing views that are controversial or offensive is not, in itself, extremism. In applying this policy, Multiverse will have particular regard to its duties to secure freedom of speech and academic freedom (see section 8).

3.3 British Values (as defined by the Government):

3.3.1 democracy

3.3.2 the rule of law

3.3.3 individual liberty

3.3.4 mutual respect for and tolerance of those with different faiths and beliefs, and for those without faith

4. Multiverse's Commitment to Prevent

4.1 *Multiverse is committed to*:

4.1.1 Safeguarding all individuals from the risk of being drawn into terrorism.

4.1.2 Challenging extremist ideology and the environment in which it can flourish within our community.

4.1.3 Supporting individuals who may be susceptible to radicalisation by providing appropriate support and guidance.

4.1.4 Ensuring that our learning environment promotes fundamental British values and encourages open and respectful dialogue.

4.1.5 Reducing permissive environments, so that ideologies that can lead to terrorism are not left unchallenged and Multiverse's platforms and events are not used to promote terrorism, in a way that respects freedom of speech and academic freedom.

5. Recognising Susceptibility to Radicalisation

5.1 It is crucial to understand that there is no single profile of a person likely to become involved in extremism. However, Multiverse staff should be aware of potential indicators that an individual may be susceptible to radicalisation. These indicators should be considered within the broader context of the individual's behaviour and circumstances and do not necessarily mean someone is being radicalised. Potential indicators may include:

5.1.1 Loneliness or social isolation

5.1.2 Changes in behaviour or appearance

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5.1.3 Becoming increasingly argumentative and unwilling to listen to alternative viewpoints

5.1.4 Expressing extremist views or ideologies

5.1.5 Increased secrecy or withdrawal from usual activities

5.1.6 Online activity related to extremist content

5.1.7 Possession of extremist literature or materials

5.1.8 Showing sympathy or support for extremist groups or causes

5.1.9 Using discriminatory or hateful language

5.1.10 Advocating violence or expressing a desire for violent action

5.1.11 Association with known extremists

5.1.12 Seeking to recruit others to an extremist ideology

5.1.13 Changes in their emotional well-being

5.1.14 Experiencing personal grievances or a sense of injustice

5.1.15 Adoption of "them and us" language or an increasing interest in conspiracy narratives

5.1.16 Engagement with specific ideological drivers, including Extreme Right-Wing Terrorism (ERWT), Islamist terrorism, or Left-Wing, Anarchist and Single-Issue Terrorism (LASIT)

5.1.17 Expression of or support for "Incel" (involuntary celibate) ideologies or extreme misogyny

5.1.18 A fascination with extreme violence or mass casualty attacks, whether or not this is linked to a clear ideology.

5.2 Contextual Susceptibility: Radicalisation can be a form of exploitation. Staff should be particularly alert where a learner is in one of the groups set out in the Safeguarding Policy (Learners at Potential Greater Risk of Harm), and in particular where learners:

5.2.1 Are care leavers or currently in the care system, where the search for identity or belonging can be exploited;

5.2.2 Have recognised neurodiverse needs, Additional Learner Needs (ALN) and/or disabilities, which may affect their ability to navigate complex social cues or identify online grooming;

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5.2.3 Experience significant personal or economic grievances, which radicalisers may use to validate extremist narratives of "us vs. them";

5.2.4 Are experiencing poor mental health, social isolation or a significant life change, which may increase susceptibility to online grooming or to narratives that offer belonging or purpose. Being in one of these groups does not, in itself, indicate a risk of radicalisation. In line with section 5.5 of the Safeguarding Policy (Anti-discriminatory and anti-racist practice), staff must not make assumptions about a learner's susceptibility based on their faith, ethnicity, nationality, political views or any other protected characteristic.

5.3 Staff should follow the Home Office Notice, Check, Share approach:

- *Notice:* be alert to changes in a learner's behaviour, language or online activity, including the indicators in 5.1.
- *Check:* speak to the Safeguarding Team promptly. Where it is safe and appropriate, a sensitive conversation with the learner may help to clarify what you have seen, but staff should not question learners about their beliefs and are not expected to investigate or assess risk.
- *Share:* report the concern using the procedures in section 10.

Staff are encouraged to share observations rather than make assumptions.

5.4 In line with the Key Principles of Prevent (February 2026):

5.4.1 A clear or identifiable ideology is not needed for a concern to be raised or a referral to be made. Staff are not expected to work out a learner's ideology; that is the role of the Safeguarding Team and Prevent partners.

5.4.2 A concern must not be dismissed because a learner has a mental health condition, is neurodivergent or has ALN. These factors may sit alongside a Prevent concern; they do not explain it away.

5.4.3 A previous referral that was closed, or that did not progress, does not prevent a further referral where new or continuing concerns arise.

5.4.4 Concerns that relate only to other forms of serious violence, such as knife crime or gang involvement, should still be reported to the Safeguarding Team, who will decide on the right route. This will not usually be Prevent.

6. Roles and Responsibilities

6.1 *The Designated Safeguarding Lead (DSL)*: has overall strategic responsibility for this policy and for Multiverse's compliance with the Prevent duty. The DSL decides whether a concern should be referred to Prevent or another agency, contributes to Channel panels where required, maintains the Prevent Risk Assessment and Action Plan (see section 7.1), and is responsible for Multiverse's Prevent reporting to the Office for Students (see section 14.3). The DSL is supported by the CEO and Exec,

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who are responsible for the operational leadership of safeguarding, including Prevent.

6.2 *The Deputy Designated Safeguarding Lead (DDSL)* holds the Prevent responsibilities set out in the Safeguarding Policy, including helping to identify individuals who may be susceptible to radicalisation, contributing to support plans and Channel referrals, and helping to implement and maintain the Prevent Risk Assessment and Action Plan. When the DSL is absent, Prevent decisions are made in line with the DSL Cover and Absence SOP.

6.3 *The Safeguarding Team* is responsible for assisting the DSL in all safeguarding and Prevent matters, offering support to staff, advising on concerns raised, and ensuring that appropriate referrals are made to relevant agencies in the absence of the DSL.

6.4 *Multiverse Learner Facing Staff (including but not limited to coaches)*: are responsible for undertaking mandatory Prevent training on induction, and refresher training every 2 years. They must be aware of the procedures contained within this document and their duty to be vigilant in identifying potential indicators of radicalisation. They are responsible for promoting fundamental British values through their interactions with learners. They must report any concerns about a learner who may be susceptible to radicalisation contacting safeguarding@multiverse.io (see Section 10) or using the internal Multiverse Safeguarding Disclosure Form.

6.5 *All Multiverse Staff*: must be alert to changes in a learner's behaviour that may give cause for concern and advise the Safeguarding Team of any concerns regarding the learner. They must cooperate with Multiverse and relevant authorities in any Prevent-related enquiries. They must report any concern about a learner by emailing safeguarding@multiverse.io or by using the internal Safeguarding Disclosure Form.

6.6 *Multiverse's Governors*, through the Quality Sub-Committee, hold the Exec to account for Multiverse's compliance with the Prevent duty, including through the reporting set out in section 14.

7. Key Strands of Activities

7.1 *Prevent Risk Assessment and Action Plan:* Multiverse maintains a Prevent Risk Assessment and Action Plan. It is reviewed in full annually and updated every 6 months by the DSL, supported by the Governance Team, and reported to the Quality Sub-Committee. It draws on national and regional threat information, including advice from the Regional Prevent Education Coordinator, and considers the make-up of the learner population, including learners at greater risk of harm and those with ALN. It identifies the protective factors and inclusion strategies needed to reduce the risk of learners being drawn into terrorism, and informs the annual review of filtering and monitoring arrangements.

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7.2 *Training and Awareness:*

7.2.1 *Staff Training*: Prevent training requirements for each role, including how often training must be refreshed, are set out in section 18.1 of the Safeguarding Policy. Prevent training covers radicalisation and extremism, factors that may make people susceptible, the Prevent duty, the Notice, Check, Share approach and fundamental British values. .

7.2.2 *Learner Awareness:* Multiverse embeds the fundamental British values into the learners curriculum. Learners are made aware of the Prevent Duty, and how to stay safe from extremism and radicalisation through signposting and resources throughout their Multiverse journey. We promote critical thinking to help learners navigate online content safely. Coaches and instructors are encouraged, as good practice, to include Safeguarding and Prevent in the contracting at the start of coaching and instructor-led sessions.

8. Speakers and Events within Multiverse

8.1 Multiverse welcomes and actively encourages external speakers as a powerful mechanism to enrich the wider learning experience. In turn, Multiverse risk assesses all external speakers; safeguarding learners and staff from extremist ideologies and ensuring that our platform is not used to promote intolerance, hatred, or violence.

8.2 Further advice and procedures for the management of events and speakers are contained within the External Speakers Policy, and must be adhered to by all staff organising external speaker events.

8.3 Multiverse is committed to freedom of speech and academic freedom within the law. In line with the Higher Education (Freedom of Speech) Act 2023 and OfS Regulatory advice 24, Multiverse will have particular regard to these duties when making decisions under this policy. The Prevent duty is a duty to have due regard to the need to prevent people from being drawn into terrorism; it is not a reason to restrict lawful speech. An external speaker or event will only be refused, or made subject to conditions, on Prevent grounds where this is a reasonable and proportionate response to a risk identified.

8.4 From 1 January 2027, any decision to refuse an external speaker or event, or to impose conditions on it, for Prevent-related reasons will be recorded and reported by the DSL to the OfS with the Regulatory Affairs team alongside their agreement before a reportable event has been submitted. This applies to all Multiverse events, whatever programme the attendees are on. Staff organising events must therefore record the outcome of every external speaker risk assessment and the reasons for it, and tell the Safeguarding Team without delay of any refusal or condition made on Prevent grounds.

9. Online Safety

9.1 To support effective learning and maintain a safe environment, we encourage coaches and learners to primarily communicate through Multiverse's approved online

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systems. These interactions may be reviewed and stored to enhance our training and assessment processes, as well as to ensure compliance with safeguarding guidelines, including Multiverse's Prevent duties. Our commitment to online safety includes the use of filtering and monitoring tools across all Multiverse online systems to prevent access to harmful content and to identify any safeguarding concerns.

9.2 Multiverse aims to educate on responsible online behaviour, including (but not limited to) awareness of online grooming and the appropriate use of social media.

9.3 Multiverse's filtering and monitoring arrangements are informed by the Prevent Risk Assessment and are reviewed at least annually, in line with Keeping Children Safe in Education 2026. Any concern about a learner accessing, sharing or creating terrorist or extremist content, including AI-generated content, must be reported to the Safeguarding Team. Staff must not view, download or forward such material to check it. Further detail is set out in the Online Safety Policy.

10. Reporting

10.1 If a member of Multiverse staff becomes aware of an emergency or urgent concern involving a learner, they must **immediately contact the appropriate emergency services by dialing 999**. All staff understand that this duty takes precedence over any other responsibilities. Additionally, the incident must be reported to the Safeguarding Team using the safeguarding email inbox safeguarding@multiverse.io or internal Safeguarding Disclosure Form, ensuring that all relevant information and actions taken are documented appropriately.

10.2 Any concerns that a learner may be susceptible to radicalisation must be reported without delay via the safeguarding email inbox safeguarding@multiverse.io or the Safeguarding Disclosure Form. Staff should not delay reporting in order to gather more evidence. Where the DSL or DDSL decides an external referral is required, they will submit it using the National Prevent Referral Form, involving the member of staff who raised the concern where appropriate. The reasons for every decision, including a decision not to refer will be recorded in Multiverse's Safeguarding Case Management System.

10.3 All others, including those external to Multiverse, should report their concerns by emailing safeguarding@multiverse.io.

10.4 No member of staff can promise confidentiality to a learner. Decisions about sharing information follow Confidentiality section in the Safeguarding Policy, including the different positions for learners under 18, adults at risk and other adult learners. Consent is not required to make a Prevent referral, and the lack of consent is not a reason to delay one where there is a risk of a person being drawn into terrorism. Taking part in Channel support is voluntary, and the Channel panel will seek the consent of the individual (or, for a learner under 18, their parent or carer) before support is provided.

10.5 Where Multiverse is told that a referral has been closed or has not progressed, the Safeguarding Team will consider what internal support or monitoring is still

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needed, and will make a further referral if new or continuing concerns arise.

11. Protective Security

11.1 Multiverse's arrangements for protective security, including its approach to the Terrorism (Protection of Premises) Act 2025 (Martyn's Law), are set out in Multiverse's Health and Safety Policy, which is owned by the Director of Workplace Operations. These include the procedures for evacuation and lockdown (shelter in place), the national Run, Hide, Tell guidance, the reporting of suspicious items, emergency broadcast arrangements for each office, and access control.

11.2 Under the Health and Safety Policy, an unauthorised person gaining entry to a Multiverse office (for example, by tailgating) is treated as a safeguarding incident as well as a security matter, and must be reported to the Safeguarding Team and the Workplace Team.

11.3 The substantive duties under the Terrorism (Protection of Premises) Act 2025 have not yet come into force. Commencement is currently expected in spring 2027, with the exact date to be confirmed. Application of the Act to individual UK offices, and their classification as standard or enhanced duty premises, will be assessed against the statutory criteria, including their use, expected simultaneous attendance and any applicable education-specific provisions. Office use alone does not bring premises within scope. Multiverse's existing protective security procedures continue to apply regardless of whether a particular office falls within the Act.

12. Data Protection

12.1 Regardless of a learner's age, it is important to respect personal data and information at all times and comply with Data Protection legislation, particularly when sharing sensitive data with other Multiverse staff or external stakeholders such as the employer. For more information on how Multiverse respects personal data please refer to our Privacy Policy.

12.2 Information about a Prevent concern will be shared only where necessary and proportionate, limited to what is needed, and recorded securely. Safeguarding individuals who may be susceptible to radicalisation is a recognised legitimate interest for processing personal data under the Data (Use and Access) Act 2025. For learners under 18, Multiverse is also subject to the information-sharing duty introduced by the Children's Wellbeing and Schools Act 2026 (see section 8 of the Safeguarding Policy). Data protection laws do not prevent information being shared to keep people safe.

13. Non-Disclosure Agreements

13.1 In line with OfS condition E6, Multiverse does not use non-disclosure agreements (NDAs) in relation to any complaint of sexual misconduct, bullying or harassment involving staff, learners or visiting speakers.

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13.2 No restricting provisions will prevent or restrict any learner from disclosing information related to allegations of harassment and/or sexual misconduct, which in any way involves or affects one or more learners, to any other appropriate person.

14. Monitoring and Review of this Policy

14.1 This Prevent Policy will be reviewed at least annually, in line with the Safeguarding Policy review cycle. The Prevent Risk Assessment and Action Plan is reviewed every six months. The policy will be reviewed sooner if there are significant changes to legislation, statutory guidance, or national or regional risk, or following learning from a Prevent case.

14.2 The DSL reports on Prevent, including referrals, themes and progress against the Prevent Action Plan, to the Quality Sub-Committee as part of the quarterly safeguarding report. Learning from closed Prevent cases is reviewed in line with the Safeguarding Policy.

14.3 As a provider registered with the Office for Students, Multiverse meets the OfS Prevent monitoring requirements, and the DSL is responsible for this reporting. It includes submitting the annual accountability and data return and, from 1 January 2027, reporting any reportable event (such as a terrorism-related arrest, or a decision to refuse or place conditions on an external speaker or event on Prevent grounds) within five working days.

15. Contact Details & Named Persons

Role	Person & Contact Details
Designated Safeguarding Lead	Julia Bindley
Deputy Designated Safeguarding Lead	Sean Thomson Katie Rowlands
Safeguarding Governor	Barbara Van Der Eecken
Safeguarding Team	safeguarding@multiverse.io
Emergency Services	999: Police, Ambulance, Fire

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Senior Leadership Team Member	Libby Dangoor, Chief Performance Officer
Regional Prevent Education Coordinator (DfE)	Prevent.London@service.education.gov.uk Co-ordinator Contact Form: Click here.
Anti-Terrorist Hotline (Counter Terrorism Policing)	0800 789 321
Reporting online terrorist content	www.gov.uk/report-terrorism

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