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Prevent Policy

Location	Oxford Campus, C/o Activate Learning, Jericho Building, Oxford OX1 1SA
Monitoring	The Principal and/or DSL and Assistant DSL(s)
Designated Safeguarding Lead (DSL) Deputy DSLs	Dr. Miriam Schmidkonz Birgit Muller and Emmanuelle Tameze Aoutsa
Overall responsibility	Board of Directors
Created	August 2021
Last review date	December 2025 – under review by OfS
Next review date	August 2026 or as necessary

The 'Prevent' strategy, published by the Government in 2011, is part of an overall counter-terrorism strategy, CONTEST.

The Counterterrorism and Security Act (2015) imposes a duty on Education providers to "have due regard to the need to prevent people being drawn into terrorism." This is now commonly known as the 'Prevent' duty.

The aim of the Government's 'Prevent' strategy is to reduce the threat to the UK from terrorism by stopping people becoming terrorists or supporting terrorism.

In this context, the following definitions have been applied:

- **Extremism** is the vocal or active opposition to our fundamental values, including democracy, the rule of law, individual liberty and the mutual respect and tolerance of different faiths and beliefs. This also includes calling for the death of members of the armed forces.
- **Radicalisation** refers to the process by which a person comes to support terrorism and extremist ideologies associated with terrorist groups.

1. What we must do to comply with our duty

- assess the risks associated with people being drawn into terrorism and assess the context of their local situation and draw up a proportionate action plan to mitigate those identified risks
- tackle the ideological causes of terrorism
- have responsive, effective welfare support systems, ensuring concerns about students' wellbeing can be acted on in a joined-up way, drawing on links to local Prevent structures (such as local authorities or the police) if necessary
- have systems in place for assessing and mitigating risks around external speakers and events on campus, while maintaining the existing duty to promote freedom of speech
- ensure all members of staff and in particular senior management are engaged with the Prevent duty and arrange ongoing Prevent training for relevant staff
- implement an IT usage policy which covers the Prevent duty
- ensure that students' associations are aware of and are consulted on, policies concerning activities on campus.



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2. Scope

EM Normandie UK Limited (hereafter 'EMN', 'EMN UK', 'the school', 'we', 'us'), understands its primary responsibility under the 'Prevent' strategy to be the safeguarding and welfare of its students and staff. Our Prevent policy and duty therefore applies to all members of the EMN community: students, staff, including those working under service contracts, visitors and external speakers, that is to say

- all persons (whether academic staff or otherwise) whose normal place of work is the EM Normandie UK campus in Oxford, including those who work from home
- all students studying at EM Normandie Oxford, whether directly enrolled or not, at all times including in the context of their involvement with Student Associations
- any other person who uses the school's facilities even if they are not directly associated with EMN

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

3. Application

- Every member of the EMN community has a personal responsibility to understand and engage with this policy.
- We believe that students have an important role to play in the application of 'Prevent'. We encourage all students to contact their Head of Programme, the Student Life Officer or the Principal immediately to raise concerns regarding any other member of the EMN Community who may be at risk of radicalisation.
- The school's permanent employees will be asked to complete a 'Prevent' training module accessible via www.elearning.prevent.homeoffice.gov.uk, to help them identify and, if necessary, refer students who may be at risk of radicalisation. All teaching contractors will be encouraged to complete the same training.
- Prevent training is mandatory for all members of staff and all persons in senior management who are not members of staff of EM Normandie UK Limited (e.g., members of the Board of Directors). Prevent training certificates must be renewed every 3 years.
- The DSL and any assistants are required to undertake also the 'Prevent referral training' every 3 years
- The Board of Directors and the EMN UK Management Team have a responsibility for implementing this policy and for ensuring that in doing so, EMN will not discriminate on the grounds of race, colour, nationality, ethnic or national origin, religion or religious belief, sex or sexual orientation, marital or civil partner status, disability or age or any other legally protected characteristic.
- Prevent awareness training will be part of student inductions and 'Prevent' will be a permanent agenda point during Student Life Committee meetings.

In fulfilling its 'Prevent' duties, EMN will defend and up-hold academic freedom and free speech in line with the principles and provisions expressed in its corresponding policies and statements.



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4. Process of Radicalisation

The Institute of Strategic Dialogue defines radicalisation as

‘the process through which an individual changes from passivity or activism, to become more revolutionary, militant or extremist, especially where there is intent towards, or support for, violence.’

Driving factors behind radicalisation can include

- a lack of integration and/or polarisation
- an identity crisis and/or isolation

- the political and/or democratic disenfranchisement of an individual
- the experience of discrimination
- foreign policy and/or international crises or disputes
- political movements
- ideologies or faiths

Contributing factors

Vulnerability, isolation and personal grievances added to strong political, religious social views, can result in a person searching for a cause. People can become vulnerable for many reasons, including

- low self-esteem
- a feeling of guilt
- loss
- isolation
- family breakdowns
- fears and anxieties
- a lack of purpose
- anger
- peer pressure

Vulnerabilities or susceptibilities may make it easier for extremists to target the individual in an attempt to radicalise them. Persons who are being targeted may show signs of changes in their behaviour.

Signs that may cause concern

- Students talking about exposure to extremist materials or views outside the school
- Changes in behaviour, e.g. becoming isolated
- Fall in standard of work, poor attendance, disengagement
- Changes in attitude, e.g. intolerance of differences/ having closed mind
- Offering opinions that appear to have come from extremist ideologies
- Attempts to impose own views/ beliefs and intolerance toward, those of others
- Use of extremist vocabulary attempts to exclude others or incite violence
- Accessing extremist material online or via social network sites
- Overt new religious practices
- Display of drawings or posters showing extremist ideology/ views/ symbols
- Students voicing concerns about anyone



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5. What we can do to counteract the risk of radicalisation

- Promote a safe and supportive international environment via clear expectations of accepted behaviours and those, including radicalisation and extremism, that will not be tolerated
- Promote core British values
- Encourage and develop critical awareness and thought to counter accepting extremism without question, especially of online material
- Challenge radical or extremist views in any context (formal or informal)
- Be ready to react when world or local events (e.g. Paris attacks) cause upset and the likelihood of conflicting feelings being expressed. Prevent lead to take initiative in these situations.
- Have strong filters on IT equipment and clear rules on accessing extremist/ terrorist websites/uses of social networks to exchange extremist/ terrorist views
- Ensure that extremist speakers do not use premises to distribute material or expound views; have system for vetting any visiting speakers/ presenters where appropriate
- Encourage contact with students in the school, getting to know them will make it easier to spot changes in their behaviour
- Staff to be observant and vigilant in noticing any signs of radical or extremist behaviour

6. What to do if you believe someone to be at risk of radicalisation

There is no single profile or indication of a person who is likely to become involved in terrorist-related activity. The factors surrounding exploitation are many and they are unique for each person.

'Notice – Check – Share' is a simple 3-step procedure which should be followed if you have concerns about someone being radicalised:

(i) Notice - articulate your concerns , consider

- engagement - Is there any information to indicate that the 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 the individual has indicated that they may be willing to use violence or other illegal means?
- capability - Is there any information supporting what the individual may be capable of doing?

(ii) Check – Who can help you to put your concerns into context?

If your concerns are about a student, in the first instance, you may want to discuss the issue with another colleague who knows the student well. This could be the Link Officer, the Head of Programme or the Principal. It may then be decided to share the concerns with the student's parents and the student her or himself. However, this should always be discussed with and agreed to by the Principal and/or DSL (Designated Safeguarding/Prevent Lead) before any action is taken.

If your concerns are about a colleague, contractor or visitor: please approach the Principal (DSL) or one of the assistant DSLs directly.



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(iii) **Share** – Who is qualified to take this forward?

Any concerns raised must be brought to the attention of the Principal (DSL) or, in their absence, the assistant DSLs, as soon as possible and they will take the matter forward.

7. Visitors and visiting speakers

This applies to all visitors and visiting speakers, whether invited by EMN or students

- visitors and visiting speakers must sign in at the main office of EMN
- they will be given a visitors' pass and asked to wear this at all times
- visiting speakers and other visitors who can provide an original, clean enhanced DBS check (incl. Section 142, CH & A Barring and 'Other') which is not older than 12 months, prior to or upon arrival, may circulate in the school and address student groups on their own
- visiting speakers and other visitors without this DBS information must be accompanied during their time in the school by a fully vetted member of staff and are only allowed on their own to address groups where all students are 18 or older

If addressing groups of students where under 18-year-olds are present, the session must be attended by a fully vetted member of staff.

The school will obtain such formal or informal background information about a visiting speaker or other visitors as is reasonable in the circumstances, to decide whether to invite or allow a speaker to attend the school.

Raising concerns

Any student, member of staff or any other member of the EMN community should raise concerns they may have immediately with

- their Line Manager
- the Student Life Officer
- the Head of Programme
- the Principal
- any other member of the EM Normandie UK management team in Oxford
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or call 999 if you believe there may be an imminent threat.

Concerns raised must be reported to the DSL or assistant DSLs at the earliest opportunity .



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Dealing with concerns raised and/or making a Prevent referral

The DSL or assistant DSLs should contact the national police Prevent telephone line and/or MASH as soon as practical in the first instance, to seek advice on how to deal with a specific situation and whether to make a Prevent referral. (Please see contact details at the bottom of this document). They may want to speak with the individual and/or a parent or guardian where appropriate. They may also want to consult with other relevant persons such as teachers, student services, colleagues HR etc.

If it is decided that a referral should be made, this must be done by the DSL or, in her absence, an assistant DSL, using the specific 'National Prevent Referral Form'.

<https://assets.publishing.service.gov.uk/media/68385d2428c5943237ae6528/PREVENT+National+Referral+Form+STATIC+VERSION2.pdf>

Once a referral has been made, with the individual's or, where applicable, their parents' consent, the individual may be offered a confidential, voluntary programme which will seek to provide support and counselling and help to put in place strategies to assist.

If concerns have been raised in relation to a student

When concerns have been raised about a student and/or a Prevent referral has been made, the school will support the student through close collaboration between the Principal, the Student Life Officer and, where appropriate, the parents and/or the campus Psychologist, in line with and whilst implementing any recommendations received from the Channel panel.

Nevertheless, in some instances, the Principal will also have to consider any breach of the Student Code of Conduct and whether it is appropriate to action should be taken under this policy.

If concerns have been raised in relation to a member of staff

If concerns have been raised in relation to a member of staff, in addition to the action outlined above and a possible Prevent referral, the Principal will consider whether disciplinary action is appropriate in line with the Staff Code of Conduct and the company's Disciplinary Policy. A suspension or restriction of duties may be necessary for safeguarding reasons during an investigation and possible disciplinary procedure.

Where appropriate, other organisations may have to be notified, such as the Safeguarding and Barring Service.

If concerns have been raised in relation to an adjunct lecturer or other persons on a service contract

In these cases, in addition to the action outlined above and a possible Prevent referral, the Principal will consider whether the individual is in breach of their contractual duties, which may lead to termination of the contract. A suspension or restriction of duties during any investigation.

Where appropriate, other organisations may have to be notified, such as the Safeguarding and Barring Service.

REMEMBER: in all such proceedings, matters must be dealt with sensibly. Any action taken must aim to protect and support the individual and must be kept confidential.

IMPORTANT: Any details in relation to concerns raised and Prevent referrals made must be recorded and records must be kept securely. Detailed information, records and outcomes must be kept securely and shared only on a need-to-know basis.



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Contact details

EM Normandie – Oxford

- Principal and DSL: Dr. Miriam Schmidkonz
mschmidkonz@em-normandie.co.uk Tel: 01865 681 407/412
- Assistant DSL:
Emmanuelle Tameze Aoutsa (Student Life Officer)
etamezeaoutsa@em-normandie.co.uk Tel: 01865 681 406/407
- Assistant DSL:
Birgit Muller (Office Manager)
bmuller@em-normandie.co.uk Tel: 01865 681 412

DSLs: please use the national Prevent referral form accessible in 'Safeguarding/Prevent' folder in Teams or on <https://assets.publishing.service.gov.uk/media/68385d2428c5943237ae6528/PREVENT+National+Referral+Form-+STATIC+VERSION2.pdf>

- **Thames Valley Police (Oxfordshire Prevent Co-ordinator) for advice on a referral or urgent assistance**
E-Mail: preventreferrals@thamesvalley.pnn.police.uk
Tel: 0800 011 3764 (national police Prevent advice line)
- **MASH (Multi Agency Safeguarding Hub)**
E-Mail: socialandhealthcare@oxfordshire.gov.uk
Tel: 0345 050 766



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Annex 1 - control table

Version		Name	Role	Date
Created by :	v1	Birgit Muller	Office Manager	Aug 2021
Approved by :		Miriam Schmidkonz, Principal		
Reviewed by :	v2	Birgit Muller	Office Manager	Feb 2023
Changes approved by :				
Reviewed by :	v3	Birgit Muller	Office Manager	Aug 2024
Changes approved by :		Miriam Schmidkonz, Principal		
Reviewed by :	v4	Birgit Muller	Office Manager	Aug 2025
Changes:		add. info training and visitors on campus <i>Miriam Schmidkonz</i> <small>✓ Certified by /j/ yousign</small>		
Approved by :		Miriam Schmidkonz, Principal		
Reviewed by :	v4.1	Birgit Muller	Office Manager	Dec 2025
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