

## **PREVENT POLICY**

### **1 INTRODUCTION**

#### **1.1 Purpose**

The University is required under the Counter-Terrorism and Security Act 2015 to 'have due regard to the need to prevent people from being drawn into terrorism'. Under section 29, it must have regard to guidance issued by the Home Secretary. The *Prevent Duty Guidance for higher education institutions in England and Wales* came into effect on 18 September 2015 following approval by Parliament. This document sets out how we are complying with the Duty.

#### **1.2 Scope**

The Prevent Policy applies to all staff and (where relevant) students of the University. In the context of this policy, the term students is intended to include apprentices.

### **2 PREVENT POLICY**

#### **2.1 Approach**

2.1.1 The University welcomes the Government's intention that the Prevent Duty is implemented 'in a proportionate and risk-based way' and that it should not create large new burdens on institutions. We therefore intend to implement our legal responsibilities as part of our existing policies and procedures, which we also consider to be the best way of ensuring a joined-up approach. In doing this we will actively involve the Students' Union and the campus trade unions and will continue to consult them should any changes to this policy be required in the future.

2.1.2 We take seriously our responsibility to ensure the safety and wellbeing of students, staff and the wider community and as part of this would wish to do all that we can to prevent any member of the university community from being drawn into terrorism. We also value the principles of academic freedom and general freedom of expression and have a statutory duty to protect them. Some of the ways in which we meet these responsibilities are set out in this document, on which we have consulted students (via the Students' Union) and staff (via the campus trade unions).

#### **2.2. Leadership**

2.2.1 The University takes seriously at the highest levels the need to prevent terrorism occurring in our community. Our policy has been approved by Council. The Director of Policy, Planning and Compliance has been identified as the member of senior management responsible for ensuring that the University complies appropriately with the Prevent Duty, in liaison with the DfE Prevent Regional HE/FE Co-ordinator (South West) and other key stakeholders within and beyond the University. An annual report will be made to the University Executive Board and Council.

#### **2.3 Risk Assessment and Action Plan**

2.3.1 As required by the Prevent Duty, we carry out assessments of the risk of our students being drawn into terrorism. This risk assessment is reviewed at least annually by the University Executive Board. Where any significant risk is identified we will consider what action might mitigate the impact/ likelihood of that risk crystallising, and if necessary include it in the University's Prevent Action Plan.

#### **2.4 External Speakers**

2.4.1 The Code of Practice on Freedom of Expression (University Regulation 18) has been updated to reflect the Prevent Duty. It sets out how we will ensure that we meet the different legal

requirements on us, not least the duty under the Education (No. 2) Act 1986 to secure freedom of speech within the law. Under the Code of Practice, where the views expressed constitute views that risk drawing people into terrorism, or are shared by terrorist groups, permission must be sought by the staff or student organiser from the Deputy Vice-Chancellor. Due diligence is carried out where required and we will share information with other institutions if appropriate about any particularly problematic event that comes within the remit of Prevent.

2.4.2 In complying with the Prevent Duty the University will not:

- Provide a platform for any proscribed terrorist organisation or encourage terrorism in any way;
- Allow gender segregation at any event.

2.4.3 In conjunction with the University's Code of Practice, the Students' Union has its own complementary procedures in place in relation to events organised by its societies where external speakers will be participating.

## **2.5. Security Sensitive Research**

2.5.1 The University recognises that the research and study of terrorism is valid and valuable, and that staff and students should be able to undertake this without risk of prejudice. It is therefore acknowledged that certain staff (and exceptionally students) will have need to access material which supports terrorism as part of their work. In such cases it is incumbent on the responsible member of academic staff to ensure via the University's normal ethical review processes that material is only accessed that is appropriate for the research or other work being carried out and that its use will not encourage terrorism in any way. This may include the use of an electronic and / or physical 'safe room' (as is already required by some funders for some security-sensitive research). For the protection of the individual and the University, we now require any individual who needs to access such material to register this in advance with the Director of Policy, Planning and Compliance

## **2.6 Staff Training**

2.6.1 We will carry out training on a regular basis for all relevant staff so that they can recognise those who are vulnerable of being drawn into terrorism and potential signs of radicalisation. This training will be carried out after consultation with our Regional Prevent HE/FE Co-ordinator (South West). It will include an explanation of how to handle appropriately and sensitively any concern that may emerge. For those with whom any specific concerns will be raised (primarily staff in Student Services), differentiating the risk of radicalisation from other issues will be covered in more detail, together with the opportunities and requirement to share information confidentially where needed. Our approach will be to support vulnerable students in whatever circumstance they find themselves, recognising that radicalisation could occasionally be occurring when certain behaviour is manifest but that other explanations will usually apply.

## **2.7. Pastoral Care**

2.7.1 Pastoral care is available to students in a variety of ways. Specialist support is provided through Student Services (accessed by a significant number of students). All students have a personal tutor. The Students' Union provides welfare support through its Advice and Representation Centre.

## **2.8 Faith Facilities**

2.8.1 The University seeks to ensure that appropriate provision is made for those of any faith (or those without faith) to access appropriate facilities for pastoral care and for religious purposes.

## **2.9 IT Networks**

2.9.1 We consider it unacceptable for our IT networks to be used in any way that supports, promotes or facilitates terrorism. We have referenced Prevent in our relevant IT policies and will keep under regular review the possible use of filters as a means of restricting access to content covered by the Prevent Duty as part of our risk assessment process and in discussion with other universities. Social media services such as Facebook, Twitter and Reddit provide new avenues for the distribution and accessing of extremist material, and the University takes the challenges presented by social media very seriously. If any misuse of the University's branding on social media accounts is discovered then action will be taken in accordance with the terms and conditions of the relevant platform.

## **2.10 Communications**

2.10.1 We will not permit material supporting terrorism to be displayed within University premises and will remove any such material if it is found. Likewise, we will seek to ensure that the University's printed and electronic communications (including its website) do not contain or support terrorist material or material likely to encourage terrorism and will investigate immediately if any such instances are raised. It is acknowledged that there will be legitimate reasons to display materials relating to terrorism as part of legitimate teaching and research activities, and this should be declared under the process described in paragraph 2.5.1 above.

## **2.11 Students' Union**

2.11.1 The University works closely with the Students' Union in ensuring that we provide excellent support to our students. This includes the various matters covered by this document. Students' Union staff [and Officers] will participate in the Prevent training being provided by the University and are very aware of their duties as charitable bodies. There is close collaboration with the Students' Union in relation to any controversial event proposed by one of its societies. Through regular contact with the Students' Union we will ensure that students are consulted on an ongoing basis on how we are implementing the Prevent duty.

## **2.12 Information Sharing**

2.12.1 The University is aware of the Channel process and of the opportunities for informal and formal sharing of information with relevant authorities. We will use these when we consider it is necessary and appropriate to do so in the interests of preventing people from being drawn into terrorism. Information sharing will only take place with external authorities when this is consistent with the provisions of the Data Protection Act.

## **3. ROLES & RESPONSIBILITIES**

3.1 The University Executive Board is responsible for providing Council with assurance of the University's compliance with the Prevent Duty. Council is responsible for approving the Prevent Policy and for approving the University's annual accountability and monitoring return to the Office for Students in compliance with the ongoing conditions of the University's registration.

3.2 All members of staff should be aware of the University's responsibilities under the Prevent Duty and of the measures set out above to comply with it. Members of the University community who are concerned about a student who might be at risk of being drawn into terrorism should report this to their line manager or the Head of Student Services. Concerns about members of staff who might be at risk of being drawn into terrorism should be reported to the Director of Human Resources or the Senior Legal Adviser.

#### 4 RELATED POLICIES AND PROCEDURES

4.1 The following policies and procedures are related to the Prevent Policy:

- Regulation 10.3, Computing Facilities
- Regulation 18, Freedom of Expression Code of Practice
- IT Acceptable Use Policy
- IT Security Policy
- Supporting Students in Crisis Guidance

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