

<b>Prevent Policy*</b>	
<b>Enabling Policy Statement; Executive Owner; Approval Route:</b>	Our Students - Chief Student Officer - Executive Board
<b>Is the Procedure for internal use only (Non- disclosable)?</b>	Disclosable
<b>Associated Policy Statements:</b>	Our Colleagues – Chief People Officer – Operations Committee Our Operations – Chief Operating Officer – Operations Committee Our Safety – Chief Operating Officer – Compliance Committee
<b>Authorised Owner:</b>	Director of Student Life
<b>Authorised Co-ordinator:</b>	Director of Student Life
<b>Effective date:</b>	01/12/2024
<b>Due date for full review:</b>	01/12/2027
<b>Sub documentation:</b>	
<p>*This document sits outside of the University’s POPP naming conventions. Office for Students (OfS) Requirements state that compliance with the Prevent duty is also monitored by the Office for Students (OfS), which requires universities to submit evidence that they are complying with the Prevent duty. This typically includes demonstrating that they have policies in place, including a Prevent policy, and reporting on how they manage the risks of radicalization.</p>	

### Approval History

Version	Reason for review	Approval Route	Date
1	Chief Student Officer and the Prevent Steering Group	Executive Board	20/10/20
2	Executive Board Signoff	Executive Board	09/12/20
3	Policy due for full review and migration to POPP	Executive Board	21/11/24

## 1. Purpose

- 1.1. The University acknowledges and accepts its legal duty to have due regard to the risk of people being drawn into terrorism and radicalisation. It also 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 University must balance the requirements of Prevent with its core belief that the cultural, religious and ethnic diversity of its staff and students should be celebrated. It must also meet its legal and moral obligation to allow and promote academic freedom and free speech which are vital elements of a successful community of students, scholars and the staff who support them.
- 1.2. This policy provides the management direction to ensure that the requirements of the Counter Terrorism and Security Act 2015 (hereafter referred to as "Prevent"), specifically the duty of the University to have due regard to the need to prevent people from being drawn into terrorism, is incorporated into all its relevant policies, procedures, systems, working practices and partnership arrangements.
- 1.3. The policy's key purpose is to assign the high-level responsibilities for ensuring University compliance with Prevent but will not include the detailed operational rules, processes or systems which may be necessary to meet these requirements. These are covered by other, more detailed procedures arising in relevant functional areas.
- 1.4. As the requirements of Prevent risk a conflict with the University's core obligations to facilitate and promote free speech as well as to protect individual privacy and academic freedom, the policy is presented as a series of "Prevent Principles" which aim to articulate how such conflicts should be dealt with and the scope for Prevent related changes to all other operational policies and procedures. The policy is therefore a combination of Prevent requirements coupled with core University values.
- 1.5. The policy will also assign the high-level responsibilities to senior University officers for ensuring that the requirements of Prevent are met, in ways which are consistent with this policy's principles, in the policies and documented procedures arising in their areas of responsibility.

## 2. Scope and Exceptions to the Procedure

- 2.1. This policy will apply to all in the University community: staff, students, contractors and visitors.
- 2.2. The activities of University staff and students taking place away from University sites will also fall within the policy's scope if they are undertaking activities that are, or could reasonably be perceived to be, associated with the University, this includes students on a work placement (PTY or equivalent) and international exchange.

## 3. Definitions and Terminology

- 3.1. **Prevent** – the anti-radicalisation agenda embedded in the Counter Terrorism Act and called Prevent in this policy. Vulnerable individual – an individual shown to be, on some significant level, a risk to themselves or others, if assistance is not provided.
- 3.2. **Academic freedom and freedom of speech** – the expectation that staff and students shall, have 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
- 3.3. **Radicalisation** – Process by which an individual comes to adopt extreme political, social or religious views, giving rise to a concern that they will act illegally

#### 4. Procedural Principles

4.1. The University accepts its legal responsibility to have due regard to the need to prevent people from being drawn into terrorism. In accepting this responsibility, it must also balance detailed Prevent requirements against its core mission to ensure that certain fundamental standards, vital to a thriving academic community, are preserved. This balance is achieved by ensuring that any changes to operational policies, guidelines, processes, systems or working practices, implemented to ensure Prevent compliance, align with the one or more of the following core Prevent principles:

4.1.1. Education. Critical to supporting our students and staff so that they are less susceptible to radicalisation is to educate and support them about equality, diversity and inclusion. We do this through training, communication, positive monitoring and targeted safeguarding. It is important that our approach is one of care and support.

4.1.2. Safeguarding. Preventing vulnerable individuals from being drawn into terrorism is a safeguarding issue and University policies and procedures in place to help safeguard staff and students should take into account the Prevent requirements. By joining up the support services under the Department of Wellbeing and Welfare, awareness and escalation is more transparent, has a smaller number of leads and there is less ability for a case to fall through the gaps, in conjunction with increased opportunity to support and care for vulnerable students.

4.1.3. Staff awareness. All staff are expected to complete online Prevent training. Relevant staff as determined by the Prevent Lead, should receive more detailed face-to-face Prevent training, including in ways that ensure they remain sensitive to the diversity of the University community.

4.1.4. Senior accountability. Senior University officers will maintain a risk register and will monitor the institutional risk of university members 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.

4.1.5. Celebrating diversity. The culturally diverse nature of the University must be actively celebrated and promoted to counter the threat of radicalisation from internal and external influences

4.1.6. Multi-faith. The provision of adequate facilities to allow groups to observe their faith, coupled with effective chaplaincy arrangements, are essential to harmonious community relations and inter-faith dialogue so are an important element of the University's Prevent approach.

4.1.7. Information sharing. Some internal and external information sharing will be necessary but only under appropriately controlled conditions. This does not amount to an agreement to share personal data on anything other than a needs based and case by case basis.

4.1.8. Academic freedom. The ability of students and staff to research, 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

4.1.9. Free speech. Policies and procedures 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

- 4.1.10. **Social media.** Social media, whilst ostensibly just another medium for communication, social interaction and debate, requires specific guidance and monitoring consistent with the University's free speech obligations. Social media is a vehicle by which vulnerable individuals are particularly susceptible to radicalisation.
- 4.1.11. **IT Usage.** The University will take steps to deny access to specific websites, network resources and IP addresses that provide or facilitate access to extremism materials in relation to the University's Prevent duty, this is through externally governed firewalls provided at the core of the network. Staff and students wishing to view material on external websites whose access has been disabled by targeted filtering should refer to the policy for Security Sensitive Research which outlines how access can be granted.
- 4.1.12. **Partnerships.** The University will work in partnership with statutory agencies, including the Department for Education Prevent Coordinators, other HEIs, local authorities, the Police and other bodies to assess and respond to the risk of people being drawn into terrorism.
- 4.1.13. **Students' Union Engagement.** All reasonable efforts to engage and persuade the University of Surrey Students' Union (USSU) to support this policy should be undertaken. Whilst the USSU may elect to oppose the principles of the Prevent strategy, their members must comply with University policies when engaging in University activities e.g. booking of University rooms.
- 4.2. **Responsibility for the University's compliance with the Prevent duty rests with Council.** Responsibility for this over-arching policy rests with the Chief Student Officer who is the nominated lead for the University's Prevent agenda. The Chief Student Officer will ensure that any changes to policies, processes and working practices will be consistent with this policy's principles. They will also ensure that all communications and training advance the principles of this policy. Most of the operational measures necessary to ensure compliance with Prevent will be covered by specific policies originating in the various functional departments of the University. The following officers are assigned responsibility for ensuring that policies in the following functional areas are reviewed to ensure they comply with both Prevent and the principles of this over-arching policy.
- 4.2.1. The **Chief Operating Officer** is responsible for policies and procedures relating to: IT systems and system user behaviour; student support, welfare and faith provision; and relating to the University's free speech obligations.
- 4.2.2. The **Data Protection Officer** is responsible for policies and procedures relating to Data Privacy
- 4.2.3. The **Vice-President Global** is responsible for: policies relating to the planning and execution of events; ensuring that adequate staff and student communications, via all media, are implemented and executed consistent with the principles of this policy.
- 4.2.4. The **Director of Human Resources** is responsible for policies and procedures relating to employment, staff, equality and training.
- 4.2.5. The **Provost** is responsible for policies relating to the University's free speech obligations.
- 4.2.6. The **Head of Campus Safety** is responsible for the development and maintenance of

partnerships with other agencies and for managing any information sharing with external bodies consistent with the principles of this policy. The Head of Campus Safety is assigned responsibility for managing the first line response to any terrorism or radicalisation threat and for any decision to escalate via established incident response protocols.

4.2.7. **All University staff and students** are responsible for conducting their day-to-day University activities consistent with the principles outlined in this policy and in compliance with all other University policies

## 5. Governance Requirements

### 5.1. Implementation: Communication Plan

#### 5.1.1. Communication

A detailed communication plan reviewed along with this Policy update which aligns with the principles of this policy has been prepared and implemented. Specific policies arising in various functional areas will be communicated and implemented according to their own approved plans.

### 5.2. Implementation: Training Plan

#### 5.2.1. Training

Staff training has been developed for Prevent. This includes mandatory training for all staff when joining the university and refresher training annually for staff in student facing roles. Additional training is also considered on an adhoc basis as required.

### 5.3. Review

5.3.1. This Policy shall be reviewed every three years.

5.3.2. Any interim minor changes will be made by the Operational Owner.

5.3.3. Any interim substantial changes or full reviews will be approved by the Executive Board.

### 5.4. Legislative Context and Higher Education Sector Guidance or Requirements

5.4.1. The Prevent requirements are included in section 26 of the Counter-Terrorism and Security Act 2015 202(2)(a) of the Education Reform Act 1988 sets out the obligation to have regard to the need to ensure academic freedom. Note the relevant section of the University statutes: S 202(2) refers to University commissioners: "Staff. 8.1 Staff shall have freedom within the law to question and test received wisdom and to put forward new ideas and controversial or unpopular opinions, 6 without placing themselves in jeopardy of losing their jobs or privileges. 8.2 Provision shall be made in the Ordinances in respect of discipline, dismissal, redundancy, and grievances". Sections 43 of the Education (No. 2) Act 1986, 22(4) of the Education Act 1994 and Higher Education (Freedom of Speech) Act 2023 include obligations relating to free speech. The Data Protection Act and Human Rights Act include relevant obligations relating to individual privacy and the security and fair processing of personal information. Public Interest Governance Principles section 14(7) HERA. The list (as originally determined and as revised) must include the principle that academic staff at an English higher education provider have freedom within the law, (a) to question and test received wisdom, and (b) to put forward new ideas and controversial or unpopular opinions, without placing themselves in jeopardy of losing their jobs or privileges they may have at the provider. <https://www.legislation.gov.uk/ukpga/2017/29/section/14/enacted>

## 5.5. Sustainability

5.5.1. This procedure does not have an environmental impact.

## 6. Stakeholder Engagement and Equality Impact Assessment

6.1. An Equality Impact Assessment was completed on 07/11/2024 and is held by the Authorised Co-ordinator.

6.2. Stakeholder Consultation was completed, as follows:

Stakeholder	Nature of Engagement	Request EB Approval (Y/N)	Date	Name of Contact
Governance	Copy of Policy shared and comments provided		11/11/24	Kelley Padley
H&S	Copy of Policy shared and comments provided		11/11/24	Matthew Purcell
Sustainability	Copy of Policy shared and comments provided		11/11/24	Martin Wiles
Academic Freedom of Speech	Review of Policy		13/11/24	Abi Bradbeer – Project Manager for AFFE