

# Prevent Policy

<b>Originator name:</b>	Prevent Steering Group: Chair Dr David Ashton, Vice President and Registrar.
<b>Section / Dept:</b>	
<b>Implementation date:</b>	Revised policy –October 2017
<b>Date of next review:</b>	October 2018
<b>Related policies:</b>	See Action Plan
<b>Policy history:</b>	See version history below

## Version History

Version	Author	Revisions Made	Date
1	James Newby	First Draft (for Prevent Steering Group review)	December 2015
2	James Newby	Incorporating revisions from Steering Group	January 2016
3	David Ashton	Incorporating comment by Council	March 2016
4	Harri ap Rees	Incorporating revisions following Executive Board agreement to Filter websites	Oct 2017

## Approval History

### Equality Analysis

Version	Reviewed by	Comments	Date
1	Equality & Diversity	Ongoing review to assess impact of policy on protected groups via relevant equality working groups	May 2016

### Committee Sign Off

Version	Committee Name	Date of Sign Off
1	Executive Board Committee (or other)	18 Feb 2016

<b>1</b>	<b>Introduction</b>
	<p>The University acknowledges and accepts its legal duty to have due regard to the risk of people being drawn into terrorism. 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.</p> <p>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.</p>
<b>1.1</b>	<b>Purpose</b>
1.1.1	<p>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.</p> <p>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 policies arising in relevant functional areas.</p> <p>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 standards.</p> <p>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.</p>
<b>1.2</b>	<b>Scope</b>
1.2.1	<p>This policy will apply to all in the University community: staff, students, contractors and visitors.</p> <p>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 perceived to be, associated with the University.</p>
<b>1.3</b>	<b>Equality Analysis</b>
1.3.1	<p>This policy recognises the importance of providing for and celebrating the cultural, religious and ethnic diversity of its staff and students. It complies with the public sector equality duty and requires all staff, students and visitors to respect the University’s values, be sensitive to the diversity of the University community and to show respect to all sections of that community. Monitoring should take place over time to ensure the University is aware of any trends or patterns emerging involving particular groups of people and impact of this policy on those groups. The University’s Equality and Diversity Committee, Race Equality Group and Faith Forum will be an important part of this process.</p>

<b>1.4</b>	<b>Definitions</b>
1.4.1	<p>Prevent – the anti-radicalisation agenda embedded in the Counter Terrorism Act and called Prevent in this policy.</p> <p>Vulnerable individual – an individual shown to be, on some significant level, a risk to themselves or others, if assistance is not provided.</p> <p>Academic freedom – 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</p> <p>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</p>
<b>1.5</b>	<b>Legislative context</b>
1.5.1	<p>The Prevent requirements are included in section 26 of the Counter-Terrorism and Security Act 2015.</p> <p>Education Act 1994 includes obligations relating to free speech</p> <p>The Data Protection Act and Human Rights Act include relevant obligations relating to individual privacy and the security and fair processing of personal information.</p>
<b>1.6</b>	<b>Health &amp; Safety Implications</b>
1.6.1	There are no specific health and safety concerns that relate to the policy
<b>2</b>	<b>Policy</b>
<b>2.1</b>	<b>Principles</b>
2.1.1	<p>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:</p> <ol style="list-style-type: none"> <li>1. <b>Safeguarding.</b> 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.</li> <li>2. <b>Staff awareness.</b> Staff should be made aware of the general requirements of Prevent but in ways that ensure they remain sensitive to the cultural, religious and ethnic diversity of the university community.</li> <li>3. <b>Senior accountability.</b> 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.</li> <li>4. <b>Celebrating diversity.</b> The culturally diverse nature of the University must be actively celebrated and promoted to counter the threat of radicalisation from external influences</li> <li>5. <b>Multi-faith.</b> 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.</li> <li>6. <b>Information sharing.</b> 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.</li> </ol>

	<p><b>7. Academic freedom.</b> 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</p> <p><b>8. Free speech.</b> 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</p> <p><b>9. Social media.</b> 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.</p> <p><b>10. Website Filtering.</b> The University will block 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. 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.</p> <p><b>11. Partnerships.</b> The university should work in partnership with statutory agencies, other HEIs, local authorities and other bodies to assess and respond to the risk of people being drawn into terrorism.</p> <p><b>12. SU Engagement.</b> All reasonable efforts to engage and persuade the Students' Union to support this policy should be undertaken. Whilst the SU may elect to oppose the principles of the Prevent strategy, their members must comply with University policies when engaging in University activities.</p>
2.1.2	
<b>2.2</b>	<b>Procedures</b>
2.2.1	<p>As the purpose of this policy is to outline the University's agreed principles underpinning its approach to implementing the Prevent requirements, detailed procedures will not be included.</p> <p>Policies governing the behaviour of staff and students, the rules relating to the use of IT, the approach to planning and managing events and the maintenance of free speech are in place and contain detailed procedures which all staff are expected to comply with. As these policies will be reviewed and updated to advance the principles of this policy, staff and students should consult them for instruction and guidance on specific procedures.</p> <p>To help staff and students understand which departmental and functional policies should be consulted for instructions on specific procedures relating to Prevent, a summary of the full framework of policies with Prevent related requirements is appended to this policy.</p>
<b>3</b>	<b>Governance Requirements</b>
<b>3.1</b>	<b>Responsibility</b>
3.1.1	<p>Responsibility for the University's compliance with the Prevent duty rests with Council. Responsibility for this over-arching policy rests with the Director of Student Services and Administration who is the nominated lead for the University's Prevent agenda. The Director of Student Services and Administration will ensure that any changes to policies, processes and working practices will be consistent with this policy's principles. He will also ensure that all communications and training advance the principles of this policy.</p> <p>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.</p>

	<ul style="list-style-type: none"> <li>• The Chief Information Officer is responsible for policies and procedures relating to IT systems and system user behaviour</li> <li>• The Director of Student Services and Administration is responsible for policies and procedures relating to student support, welfare and faith provision.</li> <li>• The VP Marketing and Communications is responsible for policies relating to the planning and execution of events.</li> <li>• The Director of Student Services and Administration is responsible for ensuring that adequate staff and student communications, via all media, are implemented and executed consistent with the principles of this policy.</li> <li>• The VP Human Resources is responsible for policies and procedures relating to employment, staff and training.</li> <li>• The Director of Traded Services and Business Support is responsible for policies relating to the University's free speech obligations.</li> <li>• The Head of Security Services 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.</li> <li>• The Head of Security Services 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.</li> </ul> <p>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.</p>
<b>3.2</b>	<b>Implementation / Communication Plan</b>
3.2.1	<p>A detailed communication plan which aligns with the principles of this policy has been prepared and implemented.</p> <p>Specific policies arising in various functional areas will be communicated and implemented according to their own approved plans.</p>
<b>3.3</b>	<b>Exceptions to this Policy</b>
3.3.1	<p>This is an over-arching policy setting out high level principles rather than detailed procedures so scope for exemptions does exist but will be expected to be applied on a case by case basis with appropriate justification.</p> <p>Any member of staff or student seeking an exception to a requirement of a policy in the Action Plan should secure the authorisation of the responsible officer in 3.1.1. Any activity or process that might conflict with the principles of this policy should be authorised by the Vice President and Registrar.</p>