BISHOP GROSSETESTE UNIVERSITY

Document Administration

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Prevent Policy

This policy sets out the University's response to the *Prevent* statutory duty, introduced in September 2015. It outlines the University's commitment to preventing students from being radicalised and/or drawn into terrorism.

1.   Introduction

The University is committed to its duties to protecting the principle of freedom of speech, in accordance with Section 43(i) of the Education (No 2) Act 1986, and safeguarding its students from the risks of radicalisation and terrorism.

This policy describes the University's contribution to the *Prevent* agenda. It also defines the University's process for referral into the Channel process. Channel forms a key part of the *Prevent* strategy. The process is a multi-agency approach to identify and provide support to individuals who are at risk of being drawn into terrorism.

The Counter-Terrorism and Security Act 2015 places a duty on Universities to have "due regard to the need to prevent people from being drawn into terrorism". The Act also notes that Universities must seek to balance this duty with their commitment to freedom of speech and the importance of academic freedom. The University has taken a risk-based approach in discharging its duties under the Act.

2.   Scope

This policy is written in the context of the Counter-Terrorism and Security Act 2015 and applies to all staff, students and visitors of the University.

The University recognises the interpretation of the term 'terrorism' given in the Terrorism Act 2000:

> Terrorism is the use or threat of action where it:
>
> (a) involves serious violence against a person,
>
> (b) involves serious damage to property,
>
> (c) endangers a person's life, other than that of the person committing the action,
>
> (d) creates a serious risk to the health or safety of the public or a section of the public, or
>
> (e) is designed seriously to interfere with or seriously to disrupt an electronic system,
>
> and the threat is designed to influence the government, an international governmental organisation, or to intimidate the public or a section of the public, and the threat is made for the purpose of advancing a political, religious, racial, or ideological cause.
>
> The use or threat of action of the kind in (a) to (e) above which involves the use of firearms or explosives is terrorism whether or not the threat is designed to influence the government, an international governmental organisation, or to intimidate the public or a section of the public.

3. Leadership:

The University is committed to fostering an inclusive environment in which the principle of freedom of speech is upheld. The University's senior leadership team will establish mechanisms to:

- ensure risks of radicalisation and terrorism are identified and understood
- ensure staff understand associated risks and build capabilities to deal with them
- communicate and promote the importance of the Prevent Duty
- ensure staff implement the duty effectively

A *Prevent* Steering Group has been established, which includes the Chaplain, Head of Student Support, Academic Registrar, Secretary and Students' Union President. This group is the initial focus for consideration of policy developments and for consideration of case conferences where required.

The University is committed to identifying, protecting and supporting individuals who it believes may be at risk of being drawn into terrorism. The above measures seek to establish a framework in order to ensure the University makes a full response to the *Prevent* duty. The University discharges this duty in partnership with other agencies, including the Police, Local Authorities and the network of regional *Prevent* Co-ordinators.

Ultimate responsibility for discharging the statutory *Prevent* duty rests with the University Council.

4. Partnership:

In order to ensure effective compliance with the *Prevent* duty, the University's senior management team will ensure a *Prevent* lead person (the Head of Student Support) is nominated who will oversee:

- Regular participation in local multi-agency *Prevent* Steering Group meetings (including contributions to local counter-terrorism profile monitoring)
- Regular participation in regional BIS HE *Prevent* Group meetings
- Established connections with local PREVENT co-ordinators:
  - Lincolnshire Police PREVENT Co-ordinator
  - BIS PREVENT Co-ordinator for East Midlands
- Engagement and consultation with the student body
  - Student Union
  - Annual Senior Resident Training

5. Training:

The University will ensure appropriate front line staff will be provided with training to understand radicalisation, the relationship between extremism and terrorism, and what circumstances may mean persons become vulnerable to the influence of radicalisation.

- Appropriate awareness raising events
  - Workshops Raising Awareness of Prevent training events for key staff
  - Specific events for ITE Trainees
  - Senior Management Team awareness raising

6.   Risk Assessment:

The University will undertake risk assessments to identify the potential risks associated with students being radicalised and/or drawn into terrorism. The University will identify actions to mitigate these risks and develop an appropriate action plan (see Annexe B).

The *Prevent* lead person will:
- ensure relevant updates on the *Prevent* agenda and threat levels are communicated to appropriate University staff;
- ensure the Academic Registrar, Secretary and Vice Chancellor are fully aware of current *Prevent* developments.

The University will ensure its IT Acceptable Use Policy has due regard to the duties specified in the Counter-Terrorism and Security Act Statutory Guidance. The University will ensure it has an appropriate procedure for managing external speakers visiting the campus, which is regularly reviewed.

The University will use the following policy framework to exercise it duties under the Act:

- Fitness to Study Procedure
- Crisis Intervention Procedure
- Religion and Belief Policy
- Freedom of Speech Policy
- IT Systems Acceptable Use Policy
- IT Systems Security Policy
- Research Ethics & Guidelines

The University will ensure staff understand the risk and build the capabilities to deal with it
- PREVENT training events
- Annual Senior Resident training for on campus Accommodation

The University will communicate and promote the importance of the duty via its external and internal web resources.
- BGU website/Blackboard

The University will ensure its staff implement the duty effectively through the Corporate Leadership Team and effective use of the *Prevent* lead person (Head of Student Support).

Annexe A: Referral Procedure for Concerns of Radicalisation or Terrorism

Any member of the University (student or staff member) may identify concerns about an individual potentially being drawn into violent extremism based on information received or behaviour observed.

It is important that such concerns can be shared in a safe and supportive fashion to enable concerns to be investigated and an appropriate intervention to be developed, if required.

It is equally important that assumptions are not made on the basis of information received and that referrals are investigated thoroughly and fairly. The University will seek to approach such concerns from the perspective of safeguarding the individual about whom concerns have been expressed.

Only where there is clear and compelling evidence of a requirement to do so will information be shared with other agencies.

1. Where a student or staff member has concerns that a student is expressing violent extremist views or is at risk of being drawn into violent extremism, these concerns should be passed to the Head of Student Support (HSS).

2. The HSS (or nominee) will investigate the matter, seeking to gather together the substantive information and evidence which would allow a full consideration of the case.

3. Once any available information and substantive evidence has been gathered, this will be considered by the HSS, in discussion with other members of University staff where relevant. A decision will be made as to the seriousness of the case. Three potential outcomes are likely at this stage:

   - *No further action is required*. In this case a confidential record of the case will be kept by the HSS and the Academic Registrar would be notified that a case had been investigated but no further action is required.
   - *There is substance to the case but at this stage only internal action is required.* The exact nature of the intervention required would be determined by discussion between relevant staff members. Actions and a review date will be agreed. At the review the case would be assessed again and the appropriate actions taken (as per 6.9.1 to 6.9.3). It is anticipated that in the majority of cases the intervention would be supportive and safeguarding in nature. As above, the Academic Registrar will be notified.
   - *A referral to the police is required because there are serious and immediate issues of safety to the student or others, and/or there is evidence to suggest a criminal act may be committed or has been committed.* This decision would be taken only in the most serious of circumstances and only by the Academic Registrar (or nominee).

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Annexe B: Prevent Action Plan 2016/17

Priority list of issues to be addressed or where improvement sought.	Proposed action	Success Criteria	Individual(s) with overall responsibility	Date by which the action will be completed	Progress to Date (mid-year review)
Publication of clear and visible policies regarding the Prevent agenda	Publication of policies relevant to the Prevent agenda on the University website	Publication of all newly created and updated policies	PD	March 2016	Complete. Prevent and Freedom of Speech Policies and IT policies approved and published
Creation/update of policies relevant to the Prevent agenda	Relevant policies: • Prevent Policy • IT Policy • Acceptable Use Policy (IT) • Freedom of Speech Policy (including procedure for External Speakers)	Appropriate policy documents covering key areas of the Prevent duty with specific reference to the statutory guidance and duties under the Counter Terrorism and Security Act	PD BC BC PD	January 2016	Complete. Freedom of Speech Policy, and Prevent Policy drafted. IT Policy and Acceptable Use Policy amended
Evidence of Risk Assessment in respect of key areas of the statutory duty	Implementation of Prevent Policy and Action Plan, together with compliance with HEFCE monitoring arrangements	Compliance with statutory duty through publication of policy and action plan documentation	PD	December 2015	Complete. Draft Policy and Action Plan sent to relevant persons within BGU for comment
Completion of HEFCE monitoring procedures	Submission of Prevent Annual Report to HEFCE by 1st December 2016	Relevant deadlines and data requirements met	PD	December 2016	Complete.
Completion of HEFCE monitoring procedures	Provide Self Evaluation Document by 22nd January 2016	All relevant deadlines and data requirements met	PD	January 2016	Complete. Documentation submitted
	Ensure Corporate Leadership Team (CLT) awareness of monitoring requirements	Provision of information regarding reporting duties via CLT briefing	PD	January 2016	Complete. Briefing undertaken as part of roll out of Policy

Ownership of Prevent Action Plan	Action Plan to be owned by members of CLT to ensure awareness of statutory duty throughout the organisation.	Successful dissemination/awareness raising via CLT	PD	January 2016	Complete. Action Plan sent to named colleagues. Dissemination to CLT and annual standing item established.
Staff Development	To deliver training to relevant persons which provides awareness of: • What makes people support terrorist ideologies • How to recognise vulnerability • What action to take (referral procedure)	Evidence of key staff across academic and professional support roles having undertaken training (e.g. Heads of Schools and Academic and Professional Support Departments)	CLT members Campus Security teams	September 2016	Prioritisation of frontline academic staff for staff development events Autumn 2016. Training also delivered to University Council during summer 2016
		Consider introduction of compulsory training as component of staff induction	AS	July 2016	Complete. Blend of Police-led F2F training and online seminars available
	Explore JISC online WRAP3 training (and other options)	Staff engagement with online training resource	AS	July 2016	Ongoing. JISC resources available to staff
	Register of trained staff to be established	Clear records of staff engagement with training	AS/PD	July 2016	Ongoing. HR team has established monitoring of attendance at Prevent training events, information used in annual reporting
	Prevent awareness to be covered in SU Exec and Senior Resident induction sessions	Awareness of Prevent Duty and referral procedures at BGU	PD	Annually	Complete (September 2016 and September 2017)
	Dissemination of news relevant to Prevent agenda to Prevent Steering Group	Information from Local and Regional Prevent groups to be disseminated	PD	September 2016 onwards	Ongoing - messages shared as required
Develop external speakers policy which demonstrates a clear	Room booking procedures and events procedures to	Development, publication and implementation of policy	PD	March 2016	Complete. Freedom of Speech Policy includes details of responses to events using

decision making process	include reference to external speaker policy				external speakers. Conferencing and Events team has updated booking forms in order to capture details relevant to Prevent agenda
	Develop policy which includes appropriate provisions for events allowing: • Challenge (appropriate Q & A sessions at events) • Effective Chairing • Means of closing event • Managing off-campus events Policy should include liaison with local Prevent Leads if required.	Awareness via CLT	CLT members	September 2016	CLT reminded of necessity of using central procedures to ensure events are screened for potential issues
Measures to safeguard students researching sensitive or extremist-related subjects	Relevant IT policies to be amended, including acceptable use policy Research Policies to be amended as applicable		BC DR		Complete. Policies updated. New firewall installed for 2016/17 which incorporates Prevent specific safeguarding measures Head of Student Support attended Research Ethics Committee, giving overview of Prevent agenda and institutional procedures. Revised ethics policy includes reference to Prevent. Draft text shared with the Head of Student Support

	Explore JISC support materials				Complete – materials are available to staff
	Explore UUK Guidance		BC AJ,NG,GB,DR,RS		Safe Campus Communities website circulated to CLT members, and University Council
Ensure no ungoverned spaces where extremism/radicalisation might occur	Develop Guidance to govern Chaplaincy spaces and other potential areas on campus (Room bookings and events)	Development and implementation of guidance	PG,PD	Spring 2017	Chaplain reports Chaplaincy bookings are vetted before confirmation/acceptance
	Ensure arrangements are in place for exchange of relevant information regarding external speakers with other HEIs	Membership of AUCSO	SD, SE	Spring 2017	Membership of AUCSO confirmed September 2017
	Ensure partnership arrangements in place with partners/franchises	Establish specific contact with Grantham, Stamford, Boston and Lincoln, and North Lindsey Colleges	PD	March 2016	Complete. Contacts at partner colleges identified and recorded
		Include reporting on issues relating to partner institutions in Student Advice AMR, so that they can be referred to relevant leadership meetings for monitoring	PD	Annually	Complete – no substantive issues during 16/17 (reporting due at Joint Board of Studies meeting Autumn 2017)
		Include partners in communications for Prevent CPD events taking place on campus	AS	November 2016	Recommendation from Joint Board of Studies – Enacted January 2017 training event onwards (limited take up from FE partners served by in-house Ofsted related training)

| Provision of Pastoral Care appropriate to student population | Ensure existing services aware of Prevent duties and referral procedures | Chaplaincy and Student Advice services available to provide effective response to students | PG, PD | December 2015 | Complete – teams aware of Prevent agenda/training requirements |