**PREVENT POLICY**

**1. INTRODUCTION**

**1.1 Background**

*Section 26 (I) of The Counter-Terrorism and Security Act 2015* imposes a duty (the *Prevent* Duty*)* on Universities to 'have due regard to the need to prevent people from being drawn into terrorism'.

The ***Prevent* Duty Guidance for higher education institutions in England and Wales**, published in March 2015, came into effect on 18th September 2015 following approval by Parliament. It sets out the expectation that universities will put in place policies for external speakers and events, the training of staff, welfare and pastoral care and the use of IT.  It also makes clear that the approach to the Duty should be reasonable and proportionate in the context of the assessment of risk in the local environment.

**1.2  Scope of the Policy**

The Policy applies to all students and staff of the University.

**1.3  Context**

The University has taken a risk-based approach to the *Prevent* Duty, which is aimed primarily at safeguarding the safety and wellbeing of students and staff.   The Duty is being implemented in a proportionate way that takes account of the size and context of the University and does not create additional administrative burdens on it.

The University's statutory obligations under the Duty are balanced with the principles of academic freedom and general freedom of expression within the law, although the University has no written policy relating to the latter at present.

**2. Leadership and Partnership**

The University takes seriously at the highest level the need to prevent people from being drawn into terrorism.   The approach to implementing the *Prevent* Duty has been approved by the Executive Committee, chaired by the Vice-Chancellor and by the statutory bodies of the University: the Senate and the Council.

Following publication of HM Government's *Prevent* Duty Guidance in March 2015, the University established a Prevent Working Group, whose membership comprises key members of staff and representatives of the Students' Union.  The remit of the Working Group is to advise the University on its obligations arising from the *Prevent* Duty and to make recommendations in respect of changes to procedures arising from it.

The member of senior management responsible for ensuring that the University complies with the *Prevent* Duty is the Registrar and Secretary to Council.  The *Prevent* operational point of contact is the Registry Manager, who is chair of the *Prevent* Working Group and reports to the Registrar on the implementation of Prevent policies and procedures by the relevant departments.

The University has due regard to the need to ensure students are fully consulted on the actions being taken in order to fulfil its statutory obligations.  Therefore, the President of the Students' Union, Deputy President of the Students' Union and University staff working in the Students' Union are members of the *Prevent* Working Group.

In accordance with the *Prevent* Duty Guidance, the University is working in partnership with the BIS Prevent Coordinator for the South East, and other external agencies and stakeholders, including Thames Valley Police.

An annual report on compliance with the *Prevent* Duty will be submitted by the Registrar to the Senate and Council of the University.

## 3.  Risk Assessment and Action Plan

An assessment of the risk of students being drawn into terrorism at the University has been undertaken, identifying the key risks, potential indicators and risk controls that are in place. The coverage of the risk analysis and action plan includes *Leadership; Partnership; Pastoral Care and Student Welfare; External Speakers and Events, IT Security and the Students' Union and societies*. The risk assessment shall be reviewed annually by the Executive Committee. Any significant risk identified shall be considered by the Executive Committee on the recommendation of the Prevent Working Group and included in the University's Prevent Action Plan.

## 4.  Staff Training

Prevent training shall be made available electronically to all new staff at the point of induction to ensure that they are able to understand *Prevent* and how it may impact on their roles.

Electronic training shall be made available to all current staff in order to raise awareness of *Prevent*. This shall be provided through the Safe Campus Communities website and other agencies.

Training shall be made available to all current staff (and students where appropriate) by the BIS Prevent Coordinator for the South East from August 2016 onwards. This will take the form of WRAP training (Workshops for Raising Awareness of Prevent).

More targeted training from the BIS Prevent Coordinator shall be provided for staff in specific roles. The University has been advised of the importance of such training for staff in Estates, Student Welfare and the Students' Union, together with external contractors who work in Security or other areas of the University.

Personal Tutors shall be provided with specific training to assist in their role.

Staff in other student-facing roles requiring specific training will be identified in consultation with the BIS Prevent Coordinator.

## 5. External Speakers

The University shall not provide a platform for any proscribed terrorist organisation nor allow gender segregation at any event.  Policies and procedures for booking events and rooms have been reviewed in accordance with *Prevent* Duty guidance.  The procedures require such bookings to be approved and provide a mechanism for institutional oversight of events, the use of room and external speakers. (*See Related Policies and Procedures under paragraph 11 below*)

Arrangements for visiting lecturers and speakers visiting as part of the academic curriculum, or by invitation, shall be reviewed in the light of the *Prevent* Duty to ensure they are consistent with it.  At present, responsibility for such arrangements lie with the academic staff member organising the event and/or the Dean of the relevant School of Study.

This Policy applies to conferences and similar events taking place at the University, whether they be organised by the University or by an external provider.

The Students' Union has complementary procedures in place in relation to the booking of events organised by its societies and where external speakers will be participating. (*See Related Policies and Procedures under paragraph 11 below*).

## 6. Welfare and Pastoral Care

Pastoral care is available to all full-time and part-time students studying on undergraduate and postgraduate programmes at the University, including those who are not based at the Buckingham campus.  Specialist support is provided through Student Welfare.

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

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. The procedure to be followed in such instances is the Procedure for the Referral of Concerns relating to Radicalisation. *(See Related Policies and Procedures under Paragraph 11 below)*

### 6.1 Faith and Chaplaincy Support

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. This provision is monitored by the Students' Union Office.  The University does not offer a chaplaincy service. However included on the web site www.buckingham.ac.uk/life/buck/worship are a list of *bona fide* places of worship for different religious faiths.

## 7. Information Sharing

The University is familiar with the Channel referral and reporting process and of the opportunities for informal and formal sharing of information with relevant authorities. This falls within the remit of the Student Welfare department, in consultation with the Prevent Lead and the appointed panel who would determine the outcome of potential referral cases.

Information will be shared only when it is considered necessary and appropriate to do so and in order to comply with the *Prevent* Duty. Information shared with external authorities will be consistent with the provisions of the Data Protection Act.

## 8. IT Policies

The University's IT policies have been reviewed with reference to the *Prevent* Duty and make direct reference to it. (*See Related Policies and Procedures, para 11 below*)

The policies set out what is and is not acceptable use of the University's systems for research and non-research purposes. Factors taken into account include security-sensitive research (see para 8.1 below) and filtering to limit access to harmful content.

The University operates controls over the management of the contents of its website through its Webcontent team to ensure that it cannot be used to promote extremist material or activities. Social media services, including Facebook and Twitter, are monitored by the Webcontent team and if any misuse of the University's branding on social media is identified, it is reported to the senior management of the University.

### 8.1 Security Sensitive Research

The University acknowledges that some staff and students have valid reasons for researching in the areas of security, intelligence, and terrorist-related activity associated with such academic disciplines and has taken steps to ensure that they are able to do so. Full consultations have taken place to identify which areas of research should be permitted access to websites that might otherwise be forbidden. University policies now make clear the procedures to be followed in such cases. (*See Related Policies and Procedures at paragraph 11 below*)

## 9. Communications

No communications supporting terrorism are permitted to be displayed on University premises. All such material will be removed if found.

## 10. Students' Union and Societies

The University and the Students' Union work collaboratively in the provision of support for students and this applies also to the implementation of the *Prevent* Duty. Students are members of the *Prevent* Working Group to ensure they are consulted fully in advance of changes in policies and procedures and are in a position to disseminate information to the student body.

*Prevent Policy, V1*

The senior member of staff, with responsibility for the Students' Union is a member of the *Prevent* Working Group. This staff member provides oversight of the speakers and events being organised by the Students' Union and for all other activities.

Prevent training shall also be made available to students and will be promoted through student representatives on the *Prevent* Working Group.


## 11. RELATED POLICIES AND PROCEDURES

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

Room Booking Policy for External Clients
Room Booking Terms and Conditions and Booking Form
Students' Union Events Policy
Students' Union External Speakers Form
Safeguarding Young and Vulnerable People Policy
Mental Health Policy
Use of University Computers and Data Networks
Procedure for Referral of Concerns relating to Radicalisation and Flowchart

May 2016