



## PREVENT POLICY

### 1. Introduction

- 1.1 Section 26 (l) of The Counter-Terrorism and Security Act 2015 imposes a duty (the Prevent Duty) on universities (and other public bodies) to 'have due regard to the need to prevent people from being drawn into terrorism'.
- 1.2 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.
- 1.3 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.
- 1.4 The University's statutory obligations under the Duty are balanced with those under the Duty to uphold the public-interest principles of academic freedom and freedom of speech.

### 2. Scope of the Policy

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

### 3. Leadership and Partnership

- 3.1 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 Senate and the Council of the University.
- 3.2 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.
- 3.3 The member of senior management responsible for ensuring that the University complies with the Prevent Duty is the Pro Vice-Chancellor & Director of Student Support Services. The PVC & Director of Student Support Services, is Chair of the Prevent Working Group. Operational responsibility for Prevent is delegated through the Registrar & Director of Professional Services to the Student Conduct Manager who, in turn, acts as the Prevent operational point of contact for external partners and reports to the Registrar & Director of Professional Services on the implementation of Prevent policies and procedures by the relevant departments.
- 3.4 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 and University staff working in the Students' Union are members of the Prevent Working Group.



- 3.5 In accordance with the Prevent Duty Guidance, the University is working in partnership with the DfE Prevent Coordinators for the South East and North West, as well as other external agencies and stakeholders including Thames Valley Police and The Cheshire Police.
- 3.6 An annual report on compliance with the Prevent Duty will be submitted by the Registrar & Director of Professional Services to the Council via the Senate and Risk, Audit and Compliance Committee (RACC).

#### **4. Risk Assessment and Action Plan**

- 4.1 As required by the Prevent Duty, an assessment of the risk of students being drawn into terrorism has been undertaken. The University's Prevent Risk Register and Action Plan includes Leadership and Risk Management; Partnership; Pastoral Care and Student Welfare; External Speakers and Events; IT Policies and Use of University Computers; and SU and Sports.
- 4.2 The risk assessment and action plan shall be reviewed annually by the Senate and RACC. Any significant risk identified shall be reviewed by the Registrar & Director of Professional Services on the recommendation of the Prevent Working Group and included in the University's Prevent Action Plan.

#### **5. Staff Training**

- 5.1 All permanent staff shall be required to undergo Prevent training and made aware of mechanisms for reporting Prevent-related concerns.
- 5.2 Staff identified as key to the operation of Prevent ("Key Staff") shall be required to undergo refresher training at least every three years.
- 5.3 Staff currently identified as Key Staff include: the PVC & Director of Student Support Services; the Registrar & Director of Professional Services; the Student Conduct Manager and all staff in the Casework Team; all staff in Legal Services; all staff in the Wellbeing, Skills and Diversity team; all staff in the Faculty of Medicine & Health Science Student Support team; all staff in Security; all staff in IT Services; and all staff in the Students' Union. The training will also be made available to Estates staff on a voluntary basis.

#### **6. External Speakers**

- 6.1 The University will not provide a platform for any proscribed terrorist organisation nor allow gender segregation at any event.
- 6.2 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. Responsibility for such review lies with the hiring academic, to be escalated to the relevant Dean/Associate Dean where a Prevent-related risk is identified.
- 6.3 Where conferences and similar events taking place at the University are organised by an external provider, they must complete the University's Prevent risk assessment and, where a Prevent-related risk is identified, seek the approval of the Registrar & Director of Professional Services. ABHSC staff complete their assessment in the same manner as external providers.
- 6.4 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 Section 12: Related Policies, Procedures and Forms below).

## 7. Welfare and Pastoral Care

7.1 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 on campus. Specialist support is provided through the Wellbeing, Skills and Diversity team.

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

7.3 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 (see Section 11: Procedure for the Referral of Concerns relating to Radicalisation below).

### 7.4 *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 currently offer a chaplaincy service; however, included on the website at [www.buckingham.ac.uk/life/buck/worship](http://www.buckingham.ac.uk/life/buck/worship) is a list of bona fide places of worship for those of different religious faiths.

## 8. Information Sharing

8.1 The University maintains links with the Channel referral and reporting process and of the opportunities for informal and formal sharing of information with relevant authorities. Referral and reporting is undertaken by the Wellbeing, Skills and Diversity team in consultation with the Prevent Lead and appointed panel (see Section 11: Procedure for the Referral of Concerns relating to Radicalisation below).

8.2 Confidentiality will be respected with information only shared where it is considered necessary and appropriate to do so. In such instances, information will be shared in accordance with the Prevent Duty.

8.3 Personal Data will be shared with external law enforcement authorities in accordance with the UK General Data Protection Regulation and Data Protection Act 2018.

## 9. IT Policies

9.1 The University's IT policies are reviewed with reference to the Prevent Duty regularly and make direct reference to it (see Section 12: Related Policies, Procedures and Forms below).

9.2 The policies set out what is and is not acceptable use of the University's systems for research and non-research purposes. Factors considered include security-sensitive research (see Section 9.5 below) and filtering to limit access to harmful content.

9.3 The University operates strict controls over the management of the contents of its website to ensure that it cannot be used to promote extremist material or activities.



9.4 Social media platforms, including but not limited to Facebook and Twitter, are routinely monitored by the University's content team and where any misuse of the University's branding on social media is identified, action is taken accordingly.

#### 9.5 *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. All research projects require ethical approval prior to commencement.

#### 9.6 *Communications*

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

### 10. **Students' Union and Societies**

10.1 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.

10.2 A 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.

10.3 Prevent training shall also be made available to student representatives and will be promoted by the Students' Union President and Executive.

### 11. **Procedure for Referral of Concerns relating to Radicalisation**

11.1 Any member of the University (student or staff) may identify concerns about a student being drawn potentially into violent extremism based on information received or behaviour observed. ABHSC staff members should report concerns for staff or students based in Crewe to the University's prevent coordinators in Crewe.

11.2 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 no assumptions are made on the basis of information received and that referrals are investigated thoroughly and fairly.

11.3 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.

11.4 The procedure to be followed is as follows:



### *Behaviour*

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 Wellbeing, Skills and Diversity or Faculty of Medicine & Health Sciences Student Support Lead (in the case of Faculty of Medicine & Health Sciences students only) who will arrange a meeting with the student and investigate the matter, seeking to gather together the substantive information and evidence which would allow a full consideration of the case.

The student will be made aware of the right to be accompanied by a friend when attending such a meeting.

The findings of the Head of Wellbeing, Skills and Diversity or Faculty of Medicine & Health Sciences Student Support Lead will be communicated to the Prevent Lead.

For students studying on the professionally-regulated programmes (including the MBChB and/or other Health Sciences programmes), a notification under any applicable concerns or similar process may be made.

### *IT Monitoring*

Users of University computers or data networks will be monitored in accordance with this Policy and Use of University Computers and Data Networks Policy. The user will receive a warning message upon an attempt to gain access to a website defined as 'Weapons' or 'Questionable' (which includes Hate and Racism) informing them that continuation to the site will result in the monitoring of the activity. An automatic email is then sent to the Prevent Lead detailing the website, the individual concerned and the date of access.

### *Subsequent Investigation*

Where the Prevent Lead deems that either behaviour or IT usage warrants investigation under the University's Prevent duty, available information and substantive evidence will be gathered and this will be considered by a Panel that will comprise the Registrar & Director of Professional Services, the Student Conduct Manager, the Head of Wellbeing, Skills and Diversity or Faculty of Medicine & Health Sciences Student Support Lead (as applicable) and the student's Personal Tutor.

Following consideration, a decision will be reached as to the seriousness of the case; three potential outcomes are possible at this stage:

- I. A decision that there is no further action is required. In this case a confidential record of the case will be kept by the Head of Wellbeing, Skills and Diversity / Faculty of Medicine & Health Sciences Student Support Lead. The PVC & Director of Student Support Services will be notified that a case had been investigated but that no further action is required.
- II. A decision that there is substance to the case but at this stage only internal action is required. The exact nature of the intervention required will be determined by the Panel. Actions and a review date will be agreed. At review, the case will be reassessed and the appropriate follow-up actions taken. It is anticipated that in the majority of cases the intervention will be supportive and of a safeguarding nature. The PVC & Director of Student Support Services will be notified of the outcome.



- III. A decision that a referral to Channel and/or 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 PVC & Director of Student Support Services on the recommendation of the Registrar & Director of Professional Services. The University's Code of Conduct and Disciplinary Procedures will also apply.
- IV. For students studying on the professionally-regulated programmes (including the MBChB and/or other Health Sciences programmes), a notification under any applicable Fitness-to-Practise or similar process will be made.

## **12. Related Policies, Procedures and Forms**

12.1 The following University policies, procedures and forms are related to this Prevent Policy:

- Prevent Training Plan
- Prevent Risk Assessment & Action Plan
- Conditions of Hire of the Radcliffe Centre
- Room Booking Policy for External Clients
- Room Booking Terms and Conditions and Booking Form
- Students' Union Events Policy
- Academic External Speaker Form
- Non-Academic External Speakers Form
- Students Union External Speaker Form
- University General Regulations
- Student Contract
- Anti-Bullying and Harassment Policy
- Non-Academic Misconduct Policy
- Safeguarding Young and Vulnerable Adults Policy
- Mental Health Policy
- Use of University Computers and Data Networks Policy
- University Social Media Policy
- University Data Protection Policy
- University Privacy Notice
- Medical School Code of Practice for the Concerns Process
- Medical School Code of Practice for Fitness to Practise

## **13. Audit and Monitoring**

13.1 RACC will be responsible for monitoring the effective operation of this Policy. Academic Services will be responsible for reviewing and updating the Policy in accordance with statutory requirements and making recommendations for the approval of same to both the Senate and RACC.