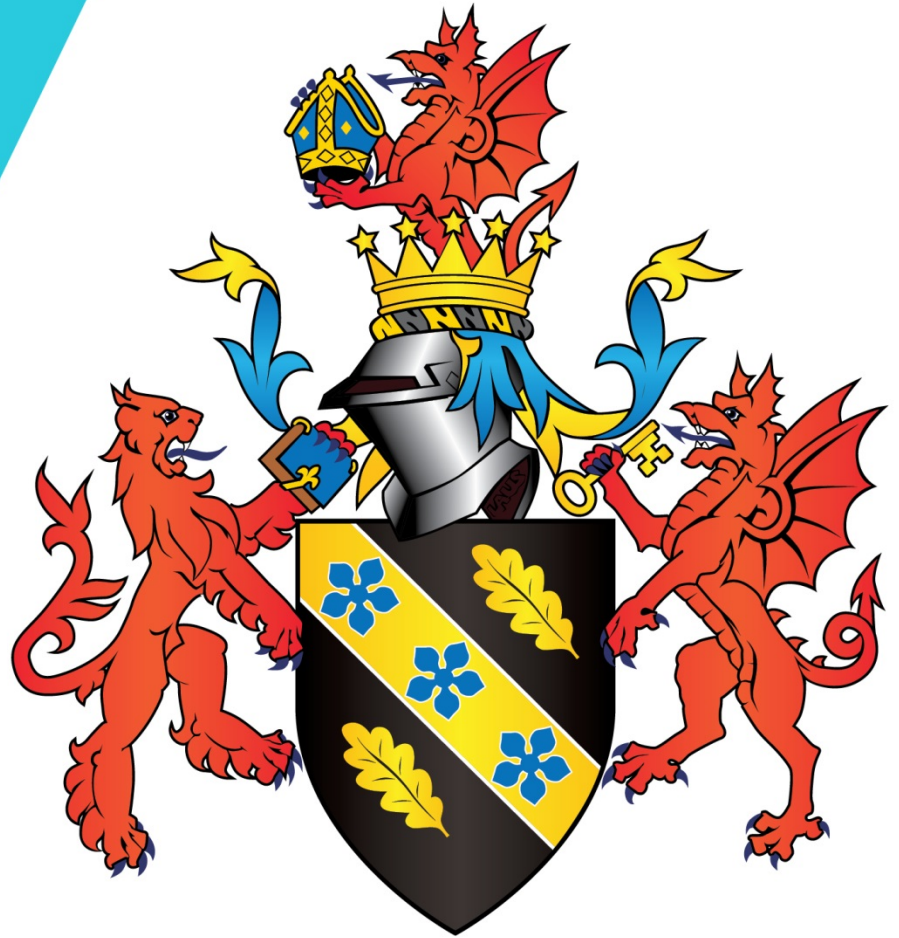




Prifysgol Cymru
Y Drindod Dewi Sant
University of Wales
Trinity Saint David



PREVENT Duty Policy

CONTENTS

CONTENTS	1
1. Introduction.....	2
2. Purpose	3
3. Scope	3
4. Definitions	4
5. Policy.....	4
5.1 Principles	4
5.2 Risk Assessment and Action Plan	5
5.3 Partnership.....	6
5.4 External Speakers and Events	6
5.5 Staff Training	6
5.6 Provision of Multi-faith Pastoral Care and Chaplaincy	7
5.7 Monitoring and use of IT equipment.....	8
5.8 Students' Union and Societies	8
5.9 Provision of a safe and secure learning environment.....	8
5.10 Communications	9
6. Monitoring and Review	9
7. Misuse of Policy	9
8. Links to other policies / procedures.....	10
<i>Approval</i>	11



1. Introduction

- 1.1 The University is required under the Counter-Terrorism and Security Act 2015 to ‘have due regard to the need to PREVENT people from being drawn into terrorism’. Under section 29 of the Act, the University must have regard to PREVENT Duty guidance issued by the Home Secretary.
- 1.2 Terrorist groups and organisations often draw on extreme ideology developed by extremist groups. In response to this, the Government has defined extremism in the PREVENT strategy as “vocal or active opposition to fundamental British values including democracy, the rule of law, individual liberty, mutual respect and tolerance of different faiths and beliefs”. As a result, the aim of the PREVENT legislation is to reduce the threat to the UK from terrorism by stopping people becoming terrorists or supporting terrorism. It has three specific strategic objectives:
- Respond to the ideological challenge of terrorism and the threat we face from those who promote it;
 - PREVENT people from being drawn into terrorism and ensure that they are given appropriate advice and support;
 - Work with sectors and institutions where there are risks of radicalisation that we need to address.
- 1.3 In September 2015, the Home Office issued guidance on the implementation of the Act and provided HE Institutions with sector specific guidance on their responsibilities.
- The guidance, which has since been updated, covered several areas of general responsibility and created a requirement for the provision of University specific PREVENT documentation.
 - This includes an Institutional Risk Assessment and associated Action Plan, together with a range of other supporting documents.
 - These documents form the core focus of the University’s approach to its responsibilities in relation to PREVENT.
- 1.4 In relation to higher education, the aim of the Act is to ensure each Higher Education Institution, whilst carrying out its functions, places an appropriate amount of weight on the need to PREVENT staff and students being drawn into terrorism.
- 1.5 Our approach is primarily one of safeguarding the welfare our students and staff. We will also ensure that the duty is balanced against our fundamental commitment to academic freedom and freedom of speech and other key legislation such as the Equality Act and the Human Rights Act. Free and open debate of often controversial subjects is a key element of University life, and we will always seek to allow events to go ahead providing that they are within the law.
- 1.6 The University welcomes the Government’s intention that the PREVENT Duty is implemented ‘in a proportionate and risk-based way’ and that it should not create large new burdens on institutions. We therefore intend to implement our legal responsibilities as part of our existing policies and procedures, which we also consider to be the best way of ensuring a joined-up approach. In doing this we will actively involve the Students’



Union and the campus trade unions and will continue to consult them should any changes to this policy be required in the future.

- 1.7 Academic freedom and freedom of speech are fundamental to being a global University; in the pursuit of new knowledge, free and open debate is crucial. In meeting its PREVENT Duty 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.
- 1.8 Our challenge is not to infringe upon academic freedoms but to ensure the welfare of our staff and students. Our ethos in implementing our PREVENT Duty is to do so with the due consideration, consultation and care to allow both academic freedom and the protection of staff and students to sit together side by side.

2. Purpose

- 2.1 This Policy summarises the University's approach to ensuring compliance with the requirements of the Counter Terrorism and Security Act 2015 and associated guidance.
- 2.2 Home Office PREVENT guidance for Higher Education Institutions contains the following sections which are reflected in this PREVENT Policy:
 - Institutional Risk Assessment and Action-Plan
 - Partnership
 - External Speakers and Events
 - Staff Training
 - Provision of Pastoral Care and Chaplaincy (including Prayer Rooms)
 - Monitoring and use of IT equipment
 - Student engagement and the Students' Union
 - Monitoring and Review
- 2.3 Matters relating to the implementation of the Policy should be directed to the Principal Officer, Student Services who has been nominated the Lead Officer for the University's operational PREVENT response.

3. Scope

- 3.1 The Policy will apply to all students registered with the University, staff employed by the University, contractors, visitors and guests of the University.
- 3.2 The Policy will apply to all University Campuses at Carmarthen, Lampeter, Swansea, Cardiff, London and Birmingham. In addition, it includes any premises which although not owned or controlled by the University are being used for University purposes.
- 3.3 Collaborative partner institutions are required to develop and implement their own specific PREVENT policies, protocols and guidance as appropriate, with guidance from the PREVENT Lead if required.



4. Definitions

- 4.1 “PREVENT” – the anti-radicalisation agenda embedded in the Counter Terrorism Act and called PREVENT in this policy.
- 4.2 “Vulnerable individual” – an individual shown to be, on some significant level, a risk to themselves or others, if assistance is not provided.
- 4.3 “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.
- 4.4 “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.

5. Policy

5.1 Principles

5.1.1 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.

5.1.2 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:

- **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.
- **Staff Training.** 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.
- **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 member of staff will be assigned lead responsibility in this policy for all PREVENT related policies and measures.
- **Celebrating diversity.** The culturally diverse nature of the University must be actively celebrated and promoted to counter the threat of radicalisation from external influences.
- **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.
- **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



- **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
- **SU Engagement.** 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 and staff must comply with University policies when engaging in University activities, or using University premises.
- **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.
- **IT Acceptable Use.** The University Information Technology and Systems Acceptable Use Policy outlines the formal process which must be followed prior to any individual accessing sensitive or extremist-related material for academic research purposes.
- **Partnerships.** The University will 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.
- **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

5.2 Risk Assessment and Action Plan

5.2.1 The University maintains an Institutional PREVENT risk assessment and associated action plan in compliance with the published guidance for Higher Education institutions. This assessment assesses where and how our students and staff might be at risk of being drawn into terrorism and includes consideration of both violent and non-violent extremism.

5.2.2 The risk assessment includes reference to the institutional policies regarding the University's campus locations and physical management of the estate, staff and student welfare, and safety and diversity.

5.2.3 Also included in the risk assessment are policies and procedures for events held by staff, students or visitors, and relationships with external bodies and community groups who use premises, or work in partnership with the institution.

5.2.4 Identified risks are captured in the University's PREVENT action Plan, which details the University's approach to managing and reducing these risks.

5.2.5 The PREVENT action plan is reviewed periodically by the University Council and presented annually by the University to HEFCW for review.



5.3 Partnership

- 5.3.1 The University is a participant in regional PREVENT networks and initiatives and is committed to working in partnership with relevant organisations within Higher and Further Education and within communities local to our campuses on stated PREVENT aims.
- 5.3.2 Appointed UWTSD Staff participate in the South Wales HE PREVENT Forum, the All Wales PREVENT Forum, the West Midlands HE PREVENT Forum and the London HE PREVENT Forum. Additionally, there is University representation at the Ceredigion, Carmarthenshire and Western Bay CONTEST Boards, and at the relevant CHANNEL Panel meetings for each County area relevant to our campuses.
- 5.3.3 As required in the PREVENT guidance, there is a single point of contact established internally within the University to enable a partnership approach to PREVENT within the organisation and between departments. The University appoints a Lead Officer for PREVENT to fulfil this purpose.

5.4 External Speakers and Events

- 5.4.1 The University has prepared a Code of Practice which covers all speakers and events hosted by the University, held on University premises, or hosted online, and any such event to which the University is affiliated, has funded or carries University branding but which takes place off campus.
- 5.4.2 The Code of Practice outlines the steps that will be taken if a risk is identified or should views be expressed which constitute views that risk drawing people into terrorism or are shared by terrorist groups. Due diligence is carried out where required and the University will share information with other institutions if appropriate about any particularly problematic event that comes within the remit of PREVENT.
- 5.4.3 In complying with the PREVENT Duty, the University will not provide a platform for any proscribed terrorist organisation or encourage terrorism in any way and will not allow gender segregation at any event.
- 5.4.4 The University is mindful of its legal responsibilities to secure freedom of speech within the law as documented in the Education Act (1986). The published Code of Practice provides guidance on meeting the requirements of both the PREVENT Duty and the Education Act.
- 5.4.5 Trinity Saint David Students' Union has its own complementary procedures in place in relation to events organised by its clubs, societies, groups and networks where external speakers will be participating.

5.5 Staff Training

- 5.5.1 The University has developed PREVENT training in line with the published sector guidance, ensuring that the training covers:
- An understanding of the factors that make people support terrorist ideologies or engage in terrorist-related activity.



- Recognising vulnerability to being drawn into terrorism, awareness of what action to take in response.
- Communicating robust procedures both internally and externally for sharing information about vulnerable individuals (where appropriate to do so).

The University expects all its staff to have an awareness of the PREVENT legislation and understand the organisational and personal responsibilities in terms of preventing people being drawn into terrorism. The University has an active Staff Training Plan which includes PREVENT training at Induction, and periodical refresher training.

5.5.2 Training is conducted either by appropriately trained UWTSD Staff or accredited external trainers dealing with areas of specialist concern.

5.5.3 The University's digital PREVENT module is available to UWTSD staff via the Staff Development Hub (intranet). In addition, all new staff are required to complete the PREVENT Module as part of the University's Initial Induction Programme and Staff Development programme.

5.5.4 UWTSD has the facility to offer PREVENT training through the medium of Welsh.

5.5.5 Staff with specific duties in relation to vulnerable students, frontline staff and those with certain other student facing roles, have received role specific training in addition to the University-wide content, and also receive regular updates on all new developments relevant to the support they offer.

5.6 Provision of Multi-faith Pastoral Care and Chaplaincy

5.6.1 The University recognises the responsibilities outlined by the PREVENT Duty in relation to faith-related activities and has outlined its approach to the use and management of faith-related spaces in the Chaplaincy and Prayer Rooms Code of Practice.

5.6.2 The University is committed to providing pastoral care, including chaplaincy, in support of the welfare and well-being of all of our students.

5.6.3 Each of the South Wales based Campuses has a Church in Wales Pastor, who takes the lead in the Provision of Chaplaincy support.

5.6.4 Links have developed links with the Muslim Council of Wales to provide connectivity, support and guidance for our Islamic students across all Welsh campuses.

5.6.5 Students at the Birmingham Learning Centres, which is non-residential, have access to faith related support at mosques local to the learning centres, in addition to accessing faith related support at their local places of worship.

5.6.6 Students at UWTSD's London Learning Centres are non-residential and have access to faith related support at their local places of worship.



5.7 Monitoring and use of IT equipment

5.7.1 The University Information Technology and Systems Acceptable Use Policy includes specific reference to the PREVENT statutory duty. The policy clearly outlines permissible general usage as well as the formal process which must be followed prior to any individual accessing sensitive or extremist-related material for academic research purposes.

5.7.2 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.

5.8 Students' Union and Societies

5.8.1 The University and the Students' Union work together in partnership on the Safeguarding agenda. A relationship agreement between the University and Students' Union is published on an annual basis, and the University maintains a Code of Practice in respect of the Students' Union in order to comply with the requirements of the 1994 Education Act.

5.8.2 University PREVENT training is made available to the Students' Union, and as an independent charity, the Students' Union maintains its own complementary PREVENT policy framework, including processes and guidance relating to student-led activity via societies, clubs, groups and networks.

5.8.3 Notwithstanding the Students' Union's own internal PREVENT policies and mechanisms, the content of this University policy applies to all students, student groups, Students' Union staff working on University premises, SU appointed contractors and visitors to the Students' Union.

5.8.4 The University recognises the Students' Union as the representative voice of students at UWTSD and works with the SU on a range of student engagement initiatives, including PREVENT where appropriate.

5.9 Provision of a safe and secure learning environment

5.9.1 The University has undertaken an assessment on the security of all of its estate and buildings to ensure they are fit for purpose. Part of this has included the need to ensure that access is only gained to authorised staff and students for purposes approved by the University.

5.9.2 The responsibility for the security is delegated to the Estates and Operations Management, and the University has demonstrated it has the ability to lock down each of its buildings and facilities.



5.10 Communications

- 5.10.1 The University will not permit material supporting terrorism to be displayed within University premises and will remove any such material if it is found.
- 5.10.2 Likewise, the University will seek to ensure that the University's printed and electronic communications (including its website) do not contain or support terrorist material or material likely to encourage terrorism and will investigate immediately if any such instances are raised.
- 5.10.3 It is acknowledged that there will be legitimate reasons to display materials relating to terrorism as part of legitimate teaching and research activities, and this process is managed via the University's established learning and teaching framework and associated processes, as overseen by Academic Standards Committee.

6. Monitoring and Review

- 6.1 The external monitoring of the University's response to the implementation of the PREVENT Guidance is carried out by HEFCW on behalf of the Welsh Government.
- 6.2 The safety and security of the University's staff, students and visitors is overseen by the University Council, which provides strategic leadership and oversight of the effectiveness of the Policy. The Council periodically review progress against the Policy and maintain oversight of the associated risk assessment and action plan. The Council is responsible for ensuring that the University participates in the annual HEFCW monitoring activity in relation to PREVENT and the Chair of Council is responsible for confirming the University's compliance on an annual basis.
- 6.3 The University's Safeguarding Forum has responsibility for the operationalisation of the Policy and escalates relevant information and detail to the University's Operational Leadership Board as required.
- 6.4 Day-to-Day operational activity in relation to the PREVENT duty will be co-ordinated by the University's nominated PREVENT Lead Officer. The Lead Officer will work under the direction of the Safeguarding Forum.
- 6.5 All staff and students of the University are required to comply with this Policy. Where appropriate compliance with relevant aspects of the Policy will be required of contractors and visitors.

7. Misuse of Policy

- 7.1 The University of Wales Trinity Saint David is required to comply with the requirements of the Counter Terrorism and Security Act 2015, in relation to ensuring that our students are not exposed to extremist ideology and that the University has procedures in place to monitor and respond to any concerns that come to light.
- 7.2 Failure to respond effectively could result in additional 'Special Measures' being imposed on the University by our Monitoring Body.



7.3 Any student or staff member in deliberate non-compliance with the procedures set out in this Policy may be subject to disciplinary action.

8. Links to other policies / procedures

8.1 The University has taken a holistic approach to its PREVENT responsibilities and there are a number of institutional policies which are inter-related; these include:

- Student Disciplinary Policy (Non-academic Misconduct)
- Safeguarding Policy
- Support for Study Policy
- Fitness to Practice Policy
- Information Technology and Systems Acceptable Use Policy
- Strategic Equality Plan
- Code of Practice External Speaker and Events

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** insert when available

Approval

The policy will be formally considered and approved in accordance with Committee Terms of Reference outlined in the Academic Quality Handbook.

If the policy affects staff, advice should be sought from HR at the outset to ascertain if consultation is required at JCC. HR will also provide advice on the most appropriate stage to consult with JCC and on whether approval by Council is required

ALL policies submitted for approval must be accompanied by a completed:

- *Equality Impact Assessment*
- *Institutional Impact Assessment*
- *Privacy Impact Assessment*

Prior to submission to committee, authors are asked to consult the Policy and Planning Team who will check that the document complies with University requirements. The Policy and Planning Team will complete the section below.

For completion by the Policy and Planning Team

Please tick to confirm the following:

An institutional Impact Assessment has been completed

An EIA has been completed

A PIA has been completed

Matters requiring consideration by the approving committee:

