



UNIVERSITY OF SOUTH WALES PRIFYSGOL DE CYMRU

PREVENT PROTOCOL

Introduction

The Government has published '*PREVENT Duty Guidance: Guidance for specified authorities in England and Wales on the duty in the Counter-Terrorism and Security Act 2015 to have due regard to the need to prevent people from being drawn into terrorism*'. Specified authorities, which includes HEIs, are required to be legally compliant. This Protocol applies to all staff employed directly by the University of South Wales, the University of South Wales Professional and Support Services Ltd and partner institutions with responsibility for educating our students and apprentices.

1. WHAT IS PREVENT?

- 1.1 PREVENT is one of the four elements of CONTEST, the government's counter-terrorism strategy. It aims to stop people becoming terrorists or supporting terrorism. The paper, '*2010 to 2015 Government Policy: counter-terrorism*', published 7th May 2015, says:

"The PREVENT strategy:

- responds to the ideological challenge we face from terrorism and aspects of extremism, and the threat we face from those who promote these views*
- provides practical help to prevent people from being drawn into terrorism and ensure they are given appropriate advice and support*
- works with a wide range of sectors (including education, criminal justice, faith, charities, online and health) where there are risks of radicalisation that we need to deal with.*

The strategy covers all forms of terrorism, including far right extremism and some aspects of non-violent extremism.

This is often commonly referred to as the three I's: Ideology, Individuals and Institutions.

2. WHAT ARE THE RISKS?

- 2.1 The Home Office Duty Guidance makes specific reference to the following risks.
- some students and apprentices may arrive at the University already committed to terrorism
 - some may become radicalised while at University
 - students and apprentices may use the Internet to access information that can be used for terrorist activity

- visiting speakers at events on campus or at virtual/remote events and meetings may encourage extreme views, incite violence or create an atmosphere conducive to drawing individuals into harmful acts and behaviour
- students and apprentices with extreme views may influence their fellow-students and apprentices through word of mouth, social media or by creating an atmosphere conducive to drawing individuals into harmful acts and behaviour.

- 2.2 There is also the risk that in implementing the PREVENT agenda an atmosphere of suspicion may be created which could be counterproductive.
- 2.3 The Duty Guidance makes reference to the need for appropriate staff training, chaplaincy and welfare support, IT, external speaker and freedom of speech policies to counter the risk of students and apprentices being vulnerable to radicalisation.

3. WHAT ARE THE UNIVERSITY'S OBLIGATIONS?

3.1 Under Section 43 of the *Education Act (No.2) 1986*, although there is no legal obligation on the University to permit meetings, the University is legally required to 'take such steps as are reasonably practicable to ensure that freedom of speech within the law is secured for members, students, apprentices, and employees of the establishment and for visiting speakers'. This includes a duty to ensure that so far as is reasonably practicable use of any University premises is not denied to any individual or body of persons on the grounds of their beliefs, views, policies or objectives.

The Act also requires an institution to issue and keep up to date a code of practice setting out the procedures to be followed by members, students, apprentices, and employees of the establishment in connection with the organisation of meetings and other activities on its premises and the conduct required of those taking part.

This Code of Practice is designed to comply with relevant legislation, including but not limited to the Education Act (No.2) 1986, the Public Order Act 1986, the Human Rights Act 1998 and the Equality Act 2010. It has been developed in the light of the guidance and good practice published in UUK's Freedom of speech on campus: rights and responsibilities in UK universities (2011) and the Counter-Terrorism and Security Act 2015.

- 3.2 The *PREVENT Duty Guidance* states:

"In fulfilling the duty in section 26 of the Act, we expect all specified authorities to participate fully in work to prevent people from being drawn into terrorism."
(para 12)

"All specified authorities must comply with this duty and will be expected to maintain appropriate records to show compliance with their responsibilities and provide reports when requested." (para 23)

The document *PREVENT Duty Guidance for higher education institutions in England and Wales* (2015) includes the statement:

"Universities will be expected to carry out a risk assessment for their institution which assesses where and how their students and apprentices might be at risk of being drawn into terrorism. This includes not just violent

extremism but also non-violent extremism, which can create an atmosphere conducive to terrorism and can popularise views which terrorists exploit.”
(para 19)

This means that the University of South Wales's compliance is based on a specific institution wide risk assessment.

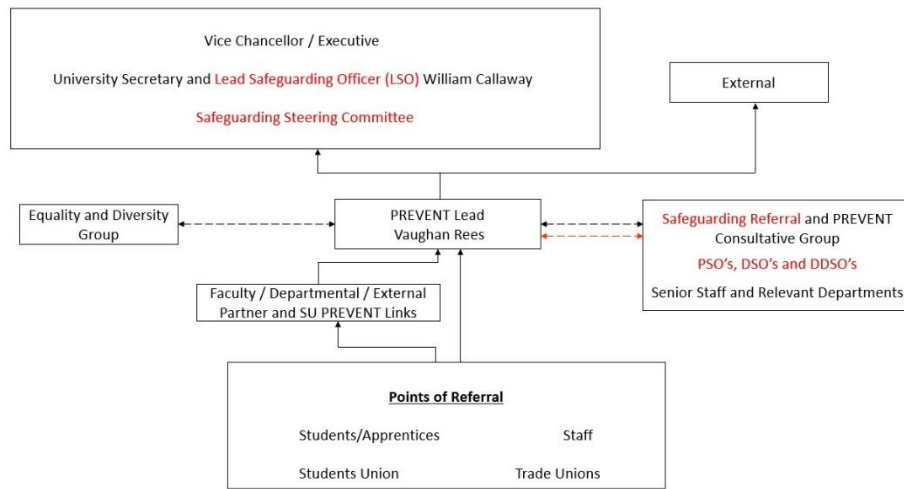
4. STATEMENT OF POLICY

- 4.1 The University of South Wales is an inclusive institution which aims to provide an environment where individuals are enabled to meet their full potential and to express themselves freely within the law.
- 4.2 The University is a diverse academic community and values the richness that diversity and difference bring to the academic life of the institution and our ability to engage globally. Diversity adds value to the student experience and to the University. Central to this concept is the ability of all its members freely to challenge prevailing orthodoxies, query the positions and views of others and put forward radical ideas that may sometimes be controversial. An environment of free and open discussion is essential to the development of lively, enquiring minds and the ability to question argue and listen that is a central element in University education.
- 4.3 At the same time, the University is committed to creating a context in which staff, students, and apprentices can work and study unhindered by hostility, offensive conduct or intimidation. Staff, students, and apprentices are expected to respect this in the manner and tone with which they express their views. This principle extends to conduct on line and on social media.
- 4.4 Universities do not exist in a vacuum, they embrace and form part of wider cultures which inform their community. Wider conflicts and disputes, often involving ethnicity or religious faith, may sometimes find expression on campus amongst the University community. The challenge for universities is to identify when the pursuit of freedom of ideas and expression crosses a threshold and becomes harmful.
- 4.5 Staff are required to do all they can to mitigate grievance at the earliest possible stage and to avoid taking any action or making any statement that may exacerbate a grievance. Appropriate referral should be made through the PREVENT processes at an early stage.
- 4.6 The University recognises that people with radical views have things to say. In the context of the University community it is important that such views are expressed in a way which makes clear that they are not conducive to, or supportive of, causing harm or violence or promoting or inciting hate.
- 4.7 Concerns expressed about vulnerabilities, which could put someone at risk of being drawn into extremism, will be treated as a pastoral concern. This is until and unless there is a real concern of that person being drawn into extremism, then it will be treated as a PREVENT concern.
- 4.8 The PREVENT Duty Guidance is an ever developing area of responsibility placed on the University by Government. The University will be guided in its compliance procedures by government, its PREVENT compliance monitors, wider HE partnerships and other statutory bodies.

- 4.9 General legal principles, and in specific areas legislation, provide that the proportionate and reasonable limitation of expression is permissible in order to maintain public order and safety or to ensure that there is no breach of the law. Whilst the University recognises the right of staff, students and apprentices to express opinions contrary to the corporate view, the right to freedom of speech is not absolute. The University will, on occasion, have to weigh conflicting demands for free public expression of ideas against concerns on its part regarding public order and safety or the potential for breaches of the law to occur.
- 4.10 Furthermore, the University has a duty under the Counter-Terrorism and Security Act 2015 to prevent staff and students and apprentices from being drawn into terrorism and ensure they are being given appropriate advice and support.
- 4.11 The University acknowledges that it has both a legal and a moral responsibility to act in a proactive manner in order to minimise the possibility that harmful extremism or intolerance will arise on campus whilst at the same time ensuring the general continuance of freedom of speech.

5. GOVERNANCE AND REPORTING STRUCTURE

The following diagram is an outline of the structure for implementing the PREVENT compliance agenda.



6. ROLES AND RESPONSIBILITIES

6.1 PREVENT links will be appointed from among the Academic Managers within each Faculty, nominated managers within each Department, a nominated person in the Students' Union, nominated persons by our apprenticeship partners, and from other partner institutions who have responsibility for USW students or staff. In addition PREVENT Links may be appointed for specific areas of responsibility from time to time. Each PREVENT Link will:

- attend University PREVENT training
- be familiar with the University's Freedom of Speech Code of Practice, PREVENT Protocol and the University External Speaker Policy.
- be trained in PREVENT issues and the University's PREVENT procedures and protocols
- be available to give initial and informal advice to staff
- receive queries or expressions of concern from staff, students, and apprentices
- inform the University PREVENT Lead of any issues or concerns relating to the PREVENT Agenda which they become aware of.
- receive applications for inviting external speakers for extra-curricular events from members of their Faculty or Department, and decide on applications they deem to be non-controversial
- refer as appropriate any potentially controversial speaker applications to the PREVENT Lead (SPOC)
- be a link between their area of responsibility and the University PREVENT Lead (SPOC)
- keep a record of all relevant conversations, applications and their outcomes.

6.2 The **University PREVENT Lead (SPOC)** will:

- be the Single Point of Contact (SPOC) directly accessible to all staff
- be available to give initial and informal advice to staff
- receive expressions of concern from PREVENT Links. These may be resolved by informal conversation, but if there seems to be a real matter for concern, the PREVENT Lead (SPOC) will gather information in order to build as full a picture as possible of the situation, consult with key staff and decide what action if any needs to be taken
- be forwarded any external speaker applications that may be considered controversial that cannot be resolved by the PREVENT Links.
- consult when necessary with the Regional PREVENT Coordinator and others
- as appropriate, consult the Executive Director/University Secretary (Compliance Officer), and as necessary with the Vice Chancellor and Executive
- Lead and oversee delivery of training within the University and, by arrangement, with external partners and assessors.
- The Strategic Implementation Manager. Degree Apprenticeships will be responsible for gaining assurance that partner staff and agents have completed appropriate Prevent training, including familiarity with USW ethos, policy and procedure through the annual performance assurance process.
- be the point of reference for all PREVENT issues internally and externally
- keep a record of all relevant conversations, applications and outcomes.

6.3 A **key group of staff** will support the PREVENT Coordinator on an issue by issue basis. The Group may include:

- the PREVENT Link within each Faculty, Department or Partnership concerned.
- the Director of Student Support Services
- the Director of Chaplaincy Services
- the Academic Registrar
- The Strategic Implementation Manager, Degree Apprenticeships.
- Other members of staff who may have a direct link to the matter at hand.

6.4 The **University Secretary (Compliance)** will have overall responsibility for the implementation of the University's PREVENT strategy and will ensure that the Vice Chancellor and Executive are properly informed.

7. **APPRENTICESHIPS**

The University recognises that first and foremost apprentices are employees of external partners. However, it will expect its external partners to:

- Where in use submit their PREVENT Policy to the University and to ensure it references the University PREVENT protocol appropriately.
- Adopt the principles and process set out in the University PREVENT Protocol
- Require external partners to appoint a PREVENT Link to liaise with the University Prevent Lead over issues of concern.
- Ensure all staff engaging with apprentices are trained in their PREVENT process and are familiar with the University's Prevent ethos, approach and processes.
- That the partner PREVENT Links are aware of the University PREVENT Process and is invited to attend University PREVENT training.
- Support the Strategic Implementation Manager, Degree Apprenticeships in ensuring that partners are compliant. (see 6.2 above)
- Will notify the University PREVENT Lead of any significant changes to PREVENT policies or process within their company.
- Assessors, appropriate apprenticeship staff and those delivering teaching will be required to attend University PREVENT Training.
- Apprentices will be provided with a handbook outlining the PREVENT protocol and points of contacts.
- Online course materials will include information on PREVENT and current PREVENT discussion topics.
- Ensure that Partners have current PREVENT, Health and Safety, and Safeguarding Policies in place and where this is not the case that the University's policies and protocols are adopted.
- Assessors and appropriate apprenticeship staff will periodically include PREVENT themes, safeguarding and Health and Safety information and scenarios in their student interactions to ensure resilience and increase awareness/knowledge.
- Give early notification to the University PREVENT Lead of any PREVENT issues or concerns relating to any of its apprentices, learners, or staff.

8. **(QAHE) Partnership**

8.1 USW is in partnership with QA Higher Education (QAHE) to deliver an International Pathway College at the University.

8.2 QAHE staff will undertake USW PREVENT training and induction on USW safeguarding processes.

8.3 QAHE students will be subject to USW PREVENT ethos, Policy and procedure.

9. INTERNAL REFERRAL PROCESS

- 9.1 Anyone who is concerned that a student or a member of staff is vulnerable to being drawn into non-violent/violent extremism and/or terrorism or if there is a concern that they may be subject to an atmosphere conducive to drawing them into harmful acts or behaviour. They can contact their designated Faculty/department PREVENT Link or the University's PREVENT Lead (SPOC) for an informal conversation. If a concern persists, they should formally refer the matter to their PREVENT Link or directly to the University's PREVENT Lead (SPOC).
- 9.2 In addition to 9.1, if an apprentice or a member of staff engaged with apprentices is vulnerable to being drawn into non-violent/violent extremism and/or terrorism or if there is a concern that they may be subject to an atmosphere conducive to drawing them into harmful acts or behaviour, then the University PREVENT Lead should be informed immediately.
- 9.3 If a concern is referred to a PREVENT Link of an external partner the following process will be followed.
- PREVENT Link of an external partner will undertake a brief risk assessment and may consult relevant colleagues discreetly.
 - If the PREVENT Link of an external partner believes that a concern has been reasonably substantiated s/he will refer the matter to the University PREVENT Lead. The PREVENT Link or of an external partner will keep a record of any concerns expressed and any action or decision not to take action.
 - The University PREVENT Lead may consult with senior colleagues in order to build a clear picture and context for the concern and will decide whether a referral to the PREVENT Channel Project is appropriate or whether alternative supportive action is necessary.
 - The University PREVENT Lead may also consult external partners for initial advice. (Other University PREVENT Leads via the South Wales HE PREVENT Forum, the DofE FE/HE Prevent Coordinator, Police PREVENT Officers and WECTU)
 - The PREVENT Lead will keep the University Secretary (**Compliance**) informed.

10. EXTERNAL REFERRAL PROCESS

- 10.1 If a concern cannot be satisfactorily resolved internally, a PREVENT referral will be made as the initial step in ascertaining suitability for admittance onto the Channel Project.

A PREVENT referral is made initially to the Channel Coordinator. This referral is assessed for suitability to be forwarded to the Channel project.

The Channel Project operates across England and Wales as a key part of the Government's PREVENT strategy. It is a multi-agency approach to provide support to individuals who are at risk of being drawn into terrorist related activity.

- 10.1.1 The PREVENT Lead (SPOC) will be the sole point of referral for the institution. In his absence the Executive Director/ University Secretary will authorise an alternative.
- 10.1.2 Where this would not constitute a danger to individuals or groups, the person being referred will be informed of the referral at the time transfer to the Channel project is made.
- 10.1.3 The Chaplaincy will offer support to the individual through the referral process and the Channel programme and liaise with other support services to coordinate a holistic support network for the student.
- 10.1.4 The Chaplaincy will offer a comfortable and safe environment within which students and apprentices going through the Channel programme may be supported.

11. REFERRAL FOR CONSIDERATION UNDER OTHER UNIVERSITY REGULATIONS

- 11.1 Following consideration of all the facts, it may be considered appropriate for a student to be referred to other University regulations, such as the Student Conduct Regulations, Fitness to Study Regulations or Fitness to Practise Regulations. In this case, the PREVENT Lead will liaise as appropriate with the Head of Student Casework and/or the Director of Student Services.
- 11.2 Following consideration of all the facts, it may be considered appropriate for a staff member to be referred to the University's disciplinary procedures. In this case the University Secretary will liaise with the Director of Human Resources.



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December 2021	Second Issue – updated reporting structures	Director of Chaplaincy Services	Governors November 2021	December 2024

Related Policies and Protocols

PREVENT Risk Assessment
Freedom of Speech Code of Practice
Speaker Policy
IT policy
Missing Student Policy
Student Conduct Regulations
Fitness to Study Regulations
Fitness to Practise Regulations
Strategic Equality Plan