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# Prevent Policy

<b>Board of Governors Approval</b>	November 28, 2019
<b>Lead:</b>	Pro Vice Chancellor Student Engagement; passing to University Secretary from 1 January 2020
<b>Date of next review:</b>	July 2020

## 1 INTRODUCTION

### 1.1 Purpose

1.1.1 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, it must have regard to guidance issued by the Home Secretary. The *Prevent Duty Guidance for higher education institutions in England and Wales*<sup>1</sup> came into effect on 18 September 2015 following approval by Parliament. This document sets out how we are complying with the Duty, taking account of changes in practice introduced by the Prevent duty: Framework for monitoring higher education in Wales - 2019/20 onwards

### 1.2 Scope

1.2.1 The Prevent Policy applies to all staff and students of the University and is designed to help individuals understand their responsibilities and what to do if they suspect that someone is at risk of being drawn into extremism or terrorism.

### 1.3 Key Definitions

- 1.3.1 The following definitions of key terms are taken from the Prevent Duty Guidance:
- **Extremism:** vocal or active opposition to fundamental British values, including democracy, the rule of law, individual liberty and mutual respect and tolerance of different faiths and beliefs. As well as call for the death of members of UK armed forces, whether in this country or overseas.
  - **Radicalisation:** the process by which a person comes to support terrorism and extremist ideologies associated with terrorist groups.
  - **Terrorism:** an action that endangers or causes serious violence to a person/people; causes serious damage to property; or seriously interferes or disrupts an electronic system. The use or threat must be designed to influence the government or to intimidate the public and is made for the purpose of advancing a political, religious or ideological cause.

## 2.1 Approach

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

2.1.2 We take seriously our responsibility to ensure the safety and wellbeing of students, staff, stakeholders, partners, contractors, and the wider community and as part of this, would wish to do all that we can to prevent any member of the university community from being drawn into extremism and/or terrorism. We also value the principles of academic

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<sup>1</sup> <https://www.gov.uk/government/publications/prevent-duty-guidance/prevent-duty-guidance-for-higher-education-institutions-in-england-and-wales>

freedom and general freedom of expression and have a statutory duty to protect them. Some of the ways in which we meet these responsibilities are set out in this document, on which we have consulted students and staff.

## **2.2 Leadership**

2.2.1 The University takes seriously at the highest levels the need to prevent extremism or terrorism occurring in our community. Our approach has been approved by the Vice Chancellor, and by the Board of Governors. The PVC Student Engagement has been identified as the member of senior management responsible for ensuring that the University complies appropriately with the Prevent Duty, in liaison with the University's Prevent Coordination Group (PCG) together with other key stakeholders within and beyond the University. This responsibility will pass to the University Secretary from 1 January 2020.

As required by the 2015 Act, the University's response to Prevent is managed by the University's Prevent Coordinator. An annual report is provided to Management Board and the Board of Governors.

## **2.3 Risk Assessment and Action Plan**

2.3.1 As required by the Prevent Duty, the University has carried out an assessment of the risk of our students being drawn into extremism or terrorism. This risk assessment is reviewed at least termly by the University's Management Board. Where any significant risk is identified consideration is given as to what action might mitigate the impact/ likelihood of that risk crystallising, and, if necessary, this is included in the University's Prevent Action Plan attached to the specific risk.

## **2.4 External Speakers**

2.4.1 The University's Code of Practice on Freedom of Speech has been updated to reflect the Prevent Duty. It sets out how we will ensure that we meet the different legal requirements on us, not least the duty under the Education (No. 2) Act 1986 to secure freedom of speech within the law.

2.4.2 In complying with the Prevent Duty the University will not:

- Provide a platform for any proscribed extremist organisation or encourage terrorism or extremism in any way;
- Allow gender segregation at any event it organises<sup>2</sup>.

2.4.3 The Prevent Coordinator will undertake a consistent assessment of all proposed events and speakers through reference to the Home Office 'Inform' process and Security Services Red Amber Green/Single Point of Entry (RAG/SPOE) Speaker Reference Protocol to provide a security narrative and risk assessment.

2.4.4 Staff, who may be deemed vulnerable to being drawn into terrorism will be reported to the Prevent Coordinator who will make an assessment and liaise with the Director of HR who together with the Pro-vice Chancellor Student Engagement, the Deputy Vice Chancellor and/or other members of the PCG will determine what action is to be taken.

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<sup>2</sup> There is a specific exception in the use of single-sex prayer rooms.

## 2.5 Security Sensitive Research

2.5.1 The University recognises that the research and study of terrorism is valid and valuable, and that staff and students should be able to undertake this without risk of prejudice. It is therefore acknowledged that certain staff (and exceptionally students) will have need to access material which supports terrorism as part of their work. In such cases it is incumbent on the responsible member of academic staff to ensure via the University's normal ethical review processes that material is only accessed that is appropriate for the research or other work being carried out and that its use will not encourage terrorism in any way. This may include the use of an electronic and / or physical 'safe room' (as is already required by some funders for some security sensitive research). For the protection of the individual and the University, we now require any individual who needs to access such material to register this in advance with the Prevent Coordinator.

## 2.6 Staff Training

2.6.1 We will carry out training on a regular basis for all relevant staff so that they can recognise those who are vulnerable of being drawn into terrorism and potential signs of radicalisation. Staff will be trained via the following 'Tier' process so that tailored training can be provided according to need:

- **Tier 1:** An e-module providing basic information on the Prevent process suitable for all staff;
- **Tier 2:** Bespoke training, covering legal referral routes, duties and case studies, for Directors of Learning and Teaching/Deans and other senior School staff;
- **Tier 3:** Specialist provision, including a police briefing, for staff including, but not exclusively, those employed in Student Services, the Students' Union staff, staff associated with international student welfare provision, accommodation and equality and diversity;
- **Tier 4:** Briefing on legal compliance and risk assessment on reputational integrity for senior management.

2.6.2 Training requirements explicitly to include the primacy, inherent in the statutory provision, of supporting vulnerable students and staff in accordance with the original Act and subsequent monitoring criteria.

2.6.3 Training to include mandatory referral to Prevent Coordinator, in the first instance, in the following situations:

- Where a potential hate crime is identified;
- Where potential racism, homophobia, or other LGBT issues, cultural cohesion issues, geopolitical conflict/context or ideological issues/narratives, are present;
- Where there is evidence of social isolation, and/or cultural alienation in the student body, and particularly in the university 'Forced Migrant' population;
- Where bereavement, grief or loss are present in regard to any of the above;
- Forced marriage or issues related to modern day slavery;
- Where there is obvious, or suspected, extremist narrative present in the university community.

## **2.7 Pastoral Care**

2.7.1 Pastoral care is available to students in a variety of ways including, but not exclusively, specialist support provided through Chaplaincy, Student Services and personal tutors. The Students' Union also provides welfare support. Matters of discipline are dealt with separately under student disciplinary processes subject to 2.6.2 and 2.6.3.

## **2.8 Faith Facilities**

2.8.1 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. Managed by the University's Chaplaincy, all prayer rooms are governed by a Prayer Room Protocol and are considered to be multi-faith. It is not permitted that any faith facilities are controlled by any single student population or group.

## **2.9 IT Networks**

2.9.1 We consider it unacceptable for our IT networks to be used in any way that supports, promotes or facilitates terrorism. We will reference Prevent in our relevant IT policies and will keep under regular review the possible use of filters as a means of restricting access to content covered by the Prevent Duty as part of our risk assessment process and in discussion with other universities. Social media provides new avenues for the distribution and accessing of extremist material, and the University takes the challenges presented by social media very seriously. If any misuse of the University's branding on social media accounts is discovered then action will be taken in accordance with the terms and conditions of the relevant platform.

## **2.10 Communications**

2.10.1 We will not permit material supporting extremism or terrorism to be displayed within University premises and will remove any such material if it is found. Likewise, we 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. 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 should be declared under the process described in paragraph 2.5.1 above.

## **2.11 Students' Union**

2.11.1 The University works closely with the Students' Union in ensuring that we provide excellent support to our students. This includes the various matters covered by this document. Students' Union staff and Officers will participate in the Prevent training being provided by the University and will be aware of the duty of the Students' Union to protect students on campus from dangerous or radical bodies.

2.11.2 The University requires that the Students' Union ensures that no religious, spiritual or philosophical event hosted by students may be permitted unless hosted by a recognised SU society and that any society wishing to host such an event will communicate with SU officers who will pass the proposed booking and speaker history to the Prevent Coordinator at least 30 days in advance of the proposed event.

2.11.3 Through working in partnership with the Students' Union the University will ensure that students are consulted on an ongoing basis on how we are implementing the Prevent duty.

## **2.12 Information Sharing**

2.12.1 The University is aware of the Channel process and of the opportunities for informal and formal sharing of information with relevant authorities. We will use these when we consider it is necessary and appropriate to do so in the interests of preventing people from being drawn into terrorism. Information sharing will only take place with external authorities when this is consistent with the provisions of the Data Protection Act.

2.12.2 All members of staff will be made aware of the University's responsibilities under the Prevent Duty and of the measures set out above to comply with it. Members of the University community who are concerned about a student who might be at risk of being drawn into terrorism should report this to their line manager who will then contact the Prevent Coordinator. The Prevent Coordinator will assess the situation and, where necessary, liaise with the Deputy Vice-Chancellor & Pro-vice Chancellor Student Engagement and/or other members of the PCG before contacting the appropriate police unit.

## **3 Roles and Responsibilities**

3.1 All members of staff will be made aware of the University's responsibilities under the Prevent Duty and of the measures set out above to comply with it. Members of the University community who are concerned about a student who might be at risk of being drawn into terrorism should report this to their line manager who will then contact the Prevent Coordinator. The Prevent Coordinator will assess the situation and, where necessary, liaise with the Deputy Vice-Chancellor & Pro-vice Chancellor Student Engagement and/or other members of the PCG before contacting the appropriate police unit.

## **4 Significant Material Changes**

4.1 Cardiff Met will notify HEFCW in a timely manner of significant material changes, which affect the way in which they are delivering their responsibilities under the Prevent duty. The Prevent Coordinator will provide an explanation of the change and its likely impact on the way in which it will deliver its responsibilities under the duty. HEFCW expects Prevent leads to be made aware of relevant material changes. Such changes include:

- Significant changes to policies or processes relating to the Prevent duty (i.e. a significantly changed Prevent-related policy, or a major revision to a process)
- Changes of responsibility for Prevent (for example, appointing a new Prevent lead)
- Changes of control (for example, new governance structures which change the oversight of the Prevent duty)
- Changes to location (including the addition of a new campus or site anywhere in the UK)
- Significant changes to teaching provision where it has an impact on Prevent-related policies (for example from online to face-to-face provision, or significant changes to partnership arrangements, such as sub-contractual teaching arrangements that impact upon Prevent-related considerations).

- Significant changes in the support provided by a Prevent partner (for example as provided by a Regional FE/HE Prevent Co-ordinator). The Prevent Coordinator will explain the impact of such changes on its ability to deliver its responsibilities under the duty, and provide evidence of alternative sources of support (e.g. for the provision of face-to-face training).
- Where there has been a major change to a policy or process, which relates to the duty, the Prevent Coordinator will explain and submit to HEFCW a revised copy of the relevant documentation.

## **5 Related Policies and Procedures**

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

- Code of Practice on Freedom of Speech
- Guidelines on Religion or Belief
- Prayer Room Management Protocol
- IVP Prevent Risk Assessment
- Electronic Communications Policy
- Student Incident Policy
- Student Disciplinary Procedure