



**Cardiff**  
Metropolitan  
University

Prifysgol  
Metropolitan  
**Caerdydd**

**Secretariat Unit**

# **Prevent Policy**

**Revised: November 2019**

**Revised: October 2020**

**Date of next review: September 2021**

## 1. Purpose

The University is required under the Counter-Terrorism and Security Act 2015<sup>1</sup> to 'have due regard to the need to prevent people from being drawn into terrorism' and to comply with the guidance issued by the Home Secretary (*Prevent Duty Guidance for higher education institutions in England and Wales*<sup>2</sup>). This document outlines our approach to the specific elements and provisions of the Act as they apply to higher education providers, as well as our general approach to issues around the vulnerability of our staff and students with regard to abuse, exploitation or radicalisation from any source, and relevant measures which enable our students to learn in a safe and supportive environment.

We have set out separately to this document the [University Policy on Equality, Diversity and Inclusion](#) and the [Code of Practice on Freedom of Speech](#). These documents complement this Policy.

## 2. Scope

This policy relates to all staff, students, visitors to University buildings and those engaged in business on behalf of the University.

## 3. Principles of Operation

- a. Cardiff Metropolitan University is committed to taking measures to ensure that students and staff are enabled to learn and work in a safe and intellectually stimulating environment.
- b. We will exercise our Prevent duties in a risk-based and proportionate way. We will embed our responsibilities into a safeguarding approach which seeks to provide support to any student or staff member who is deemed to be at risk of abuse or exploitation, including vulnerability to radicalisation and being drawn into violent extremism.
- c. We will seek to be as transparent as possible in our Prevent obligations whilst also protecting individual and personal data as outlined in the [University's Data Protection Policy](#). This involves actively engaging the Student's Union and the recognised trade unions in any changes to this, and related, policies.
- d. The University places a priority on working with partners to ensure we provide a safe environment for all. We will actively engage with South Wales HE Prevent Forum and will work in partnership with local Universities and government and security services to share information and best practice.
- e. Cardiff Metropolitan University is strongly committed to the principles of freedom of speech and has a statutory duty to protect it. We will endeavour to balance this responsibility with our commitment to student and staff safety and equality and diversity.

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<sup>1</sup> <https://www.gov.uk/government/collections/counter-terrorism-and-security-bill>

<sup>2</sup> <https://www.gov.uk/government/publications/prevent-duty-guidance/prevent-duty-guidance-for-higher-education-institutions-in-england-and-wales>

#### 4. Risk Assessment and Action Plan

In accordance with the statutory guidance for higher education providers<sup>3</sup> we have set out a risk register and action plan which will be reviewed regularly and is subject to monitoring and enforcement.

#### 5. External Speakers and Events

- 5.1 Cardiff Metropolitan University is committed to the principles of freedom of speech and complies with the requirements of Section 43 of the Education (No 2) Act 1986. Procedures are outlined in the [University's Code of Practice on Freedom of Speech](#). In complying with the Prevent Duty the University will not provide a platform for any proscribed terrorist organisation.
- 5.2 All internal bookings of rooms on campus will be made in accordance with the University's room booking procedures. Any booking of Cardiff Metropolitan University facilities by, or on behalf of, an external person or organisation must be made subject to the Conditions of Hire of the University's Facilities. All external speakers at Cardiff Metropolitan University are required to comply with the University's Code of Practice on Freedom of Speech and are required to adhere to the principles of equality as outlined in the University's Equality, Diversity and Inclusion Policy.
- 5.3 Any external organisation with a political, philosophical, religious or spiritual affiliation who wishes to book on the University's premises for the *first* time will be referred to the Prevent Co-ordinator for an initial assessment before the booking is taken.
- 5.4 The staff member who accepts room bookings on the University's behalf will assess any external speakers previously accepted against a set of criteria which enables freedom of speech and protects vulnerable people from direct exposure to unchallenged extremist views that are counter to our commitment to both student and staff safety and equality and diversity. If they have any reason to think that the speaker or event constitutes a potential breach of these commitments, they will refer the case for advice from the University's Prevent Co-ordinator.
- 5.5 Student Societies who wish to host a spiritual, philosophical or political event involving an external speaker will inform the Prevent Co-ordinator four weeks in advance of the proposed event in order to obtain the necessary permissions. This applied to event held on and off site.
- 5.6 Staff and student societies and groups arranging events online are encouraged to use Microsoft Teams and to closely manage attendees from outside the organisation. They are responsible for ensuring that all external speakers are made aware of the University's Code of Practice on Freedom of Speech and the principles outlined in the University's Equality, Diversity and Inclusion Policy. In situations where an online event organiser has reason to believe that a prospective external contributor may potentially be defined as an extremist, or is known to be a

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<sup>3</sup> <https://www.gov.uk/government/publications/prevent-duty-guidance/prevent-duty-guidance-for-higher-education-institutions-in-england-and-wales>

holder of extremist views, and/or is known to have previously contravened the principles outlined in the Equality and Diversity Policy, the situation will be referred to the Prevent Co-ordinator before the event is confirmed.

- 5.7 When appropriate, the University's Prevent Co-ordinator will seek expert guidance from external partners in reaching a recommendation regarding whether a proposed speaker or event should go permitted ahead, and/or to identify appropriate and proportionate control measures to mitigate any identified risks (for example in relation to security, providing a counter speaker to balance any argument, and/or to recommend an impartial chair to facilitate the event). The recommendation will be considered, and a decision made, by the chair of the University's Prevent Group (or nominee). Any recommendation to cancel a speaker or event will normally only be approved on the advice of the police or security services.
- 5.8 Any complaints that the University has not appropriately discharged its responsibilities in relation to freedom of speech and the Prevent Duty should be referred to the Director of Registry Services and considered under the [Complaints Policy and Procedure](#).

## **6. Identification, Support and Referral of Vulnerable People**

- 6.1 The University recognises the risk that members of our community may be targets for radicalisation by extremist groups, both face-to-face and in online environments, and we are committed to working with relevant agencies to address these risks.
- 6.2 We recognise that the isolation faced by students and staff who are primarily studying and working online may be an additional and contributory risk factor for radicalisation. In such circumstances we will take measures to endeavour to ensure continued and active engagement with the University so that we are better able to identify changes and when an individual may need additional support.
- 6.3 We will seek to identify vulnerable individuals within the University community at an early stage where possible and ensure they are given appropriate support and access to welfare services. The University's responsibilities will be managed initially through our existing safeguarding approach. It is important that our response is enabled by a safe and supportive environment and that positive relationships are fostered with the person concerned.
- 6.4 Any member of the University community who has a concern that a student may be at risk of abuse or exploitation should refer initially to Student Services through the usual Cause for Concern route. Initial concerns that a staff member may be at risk should be referred to People Services. The University is mindful that signs of vulnerability to extremism are common with signs of vulnerability to abuse in all its forms. In such cases, we are keen to understand the situation fully and put the welfare of the vulnerable person at the heart of our response and provide appropriate interventions.
- 6.5 In situations where there is evidence that a person is at risk of being drawn into violent extremism, the Prevent Co-ordinator will be contacted. The Prevent Co-ordinator may consult with statutory authorities on an anonymised basis to seek advice. They will also call a University case conference to gather as much

information as possible and undertake a risk analysis and will seek to reach an agreement on whether further internal interventions should be put in place or whether the risks are sufficiently high to necessitate an external referral into the Channel process<sup>4</sup>. For student cases, the case conference would normally comprise individuals known to the student, e.g. a representative from their Academic School, and representatives from Student Services such as the Director of Student Services, Head of the Wellbeing Service and/or the University Co-ordinating Chaplain, as appropriate. It would be normal practice to seek the individual's input into the case conference process unless the view is taken that to do so may increase the risk of potential harm. This assessment will be made on a case-by-case basis.

6.6 The University would actively engage with the Channel intervention process for any individual accepted.

6.7 If there is a direct threat of physical harm to an individual or an immediate concern regarding a person's physical wellbeing, the correct response is to call 999 and inform the University's Prevent Co-ordinator that you have done so.

## **7. Students' Union and Student Societies**

7.1 The University works in close partnership with the Students' Union both formally and informally on day to day matters as part of our shared commitment to deliver a safe learning environment and excellent student experience. We are committed to consulting with the Students' Union on an ongoing basis regarding the implementation of the Prevent Duty at Cardiff Metropolitan.

7.2 The University expects that the Students' Union will ensure that no religious, spiritual, philosophical or political event hosted by students will be permitted unless it is hosted by a recognised Students' Union Society. In any Society wishes to hold such an event, it is expected that they will contact the Prevent Co-ordinator for the necessary approvals before the event is confirmed and more than three weeks in advance of the proposed event.

## **8. Student Services**

We have a range of professional student support services, including Chaplaincy, and every student has a personal tutor. The Co-ordinating Chaplain provides pastoral support in relation to faith/spirituality and bereavement. The Students' Union also provides welfare support.

## **9. Space for Prayer and Reflection**

The University seeks to ensure that appropriate provision on both of its campuses is made for those of any faith (and those with none) to access appropriate facilities for pastoral care and for religious or spiritual purposes. Space for prayer and reflection is managed by the Chaplaincy as part of Student Services. All prayer rooms are governed by a Prayer Room Protocol and are multi-faith.

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<sup>4</sup> <https://www.gov.uk/government/publications/channel-guidance>

## **10. Staff Training**

- 10.1 The University is committed to carrying out training on a regular basis for all relevant staff so that they can recognise those who are vulnerable of being drawn into violent extremism and potential signs of radicalisation.
- 10.2 All new staff are expected to undertake an e-module on the Prevent Duty so that they know their personal responsibilities and how to make referrals.
- 10.3 Bespoke in-depth training will be provided for student-facing staff, which will involve briefing on the current terrorist threat and risks pertinent to the University's population. This training will be delivered on a need basis.
- 10.4 Annual briefing on legal compliance with the Duty and the University's risk assessment will be provided for the senior management team and the Board of Governors.

## **11. Communications**

We will not permit material supporting violent extremism to be displayed within University premises, on the University's website or in its communications. We will investigate immediately if any is found. It is, however, acknowledged that there will be legitimate reasons to display materials relating to terrorism or violent extremism as part of legitimate teaching and research activities

## **12. Security Sensitive Research**

Staff wishing to undertake any research into an extremism-related field will be required to go through the normal ethical review process. This process will determine the potential risks to the organisation, the safety and wellbeing of the participants and researchers, and identify the necessary legal and ethical requirements.

## **13. Information Technology**

We consider it unacceptable for our IT networks to be used in any way that supports, promotes or facilitates terrorism. We reference Prevent in our relevant IT policies and will keep under review the possible use of filters as a means of restricting access to content covered by the Prevent Duty as part of our ongoing risk assessment process and in discussion with our partners involved in the South Wales HE Prevent Forum.

## **14. Information Sharing**

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.

## **15. University's Prevent Duty Co-ordination Group**

- 15.1 The University's Prevent Duty Co-ordination Group meets three times a year in order to have oversight of the institution's compliance responsibilities with regards to Prevent, including its policies and procedures, and will keep under review the University Prevent risk assessment and progress against the action plan, and any other related issues.
- 15.2 The Group is chaired by the University Secretary and Clerk to the Board of Governors, and its members includes the Pro Vice-Chancellor Student Experience and other relevant senior staff from schools, professional services and the Students' Union.
- 15.3 It will receive and consider an Annual Report from the Prevent Co-ordinator, which will include information on referrals made. This will be shared with the Board of Governors.

Approved by Prevent Delivery Co-ordination Group, 14.10.20