

Prevent Duty Policy

Approved by:	Effective date:	Next review:
Senior Management Team	7 March 2023	1 December 2024

Policy Statement

The Prevent Duty Policy sets out how the University addresses its statutory responsibility to pay due regard to the need to prevent people from being drawn into terrorism. It is a response to the UK Government's strategy to reduce terrorism set out in the [Counter-Terrorism and Security Act 2015](#). The University believes individuals being drawn into terrorism is a form of harm. It accepts its obligations arising from the Prevent legislation as an important element of its general duty of care to protect its stakeholders from all forms of harm.

As an organisation, the University aims to balance the requirements of Prevent with its core belief that the cultural, religious and ethnic diversity of its staff and students should be celebrated and supported. It must also meet its legal obligations to allow and promote academic freedom and freedom of speech, which are the essential components of a thriving community of students, researchers and the staff who support them.

The duty applies to 'people', so the approach includes any concerns about staff and students.

To comply with the Prevent duty, the University needs to:

- assess the risks associated with Prevent and draw up a plan to mitigate these
- have effective welfare support systems, linking to DfE Prevent co-ordinators, local authorities, or the police if necessary, including internal and external information-sharing arrangements
- have systems for assessing and mitigating risks around external speakers and events while maintaining the existing duty to promote freedom of speech
- arrange ongoing Prevent training for relevant staff
- have an IT usage policy and, where appropriate, a research policy which covers the Prevent duty
- engage with students and ensure that the Students' Union and its societies are aware of policies concerning activities on campus

The University implements the Prevent duty in a proportionate and risk-based way so as not to create large new burdens. We do this by meeting our legal responsibilities as part of our existing policies and procedures relating to Safeguarding. We consider it the best way to ensure a joined-up approach. In doing this, we actively involve the Students' Union and continue to consult them should there be a need for any material changes to this Policy.

In developing our Policy, we took into account the following:

Home Office [Prevent duty guidance: for higher education institutions in England and Wales](#)

Office for Students [Prevent duty monitoring in higher education in England Supplementary Information Note](#)

Who needs to know about the Policy

This policy will apply to all in the University community: staff, students, contractors and visitors. The activities of University staff and students taking place away from University sites fall within the Policy's scope if undertaken as

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part of the work of the University. It includes students on a work placement (or equivalent) and international exchange.

Purpose of the Policy

The Policy's key purpose is to assign responsibilities for ensuring University compliance with Prevent. It is supported by detailed operational rules, processes or systems to meet these requirements.

This Policy aims to ensure that the requirements of the Counter Terrorism and Security Act 2015, specifically the duty of the University to have due regard to the need to prevent people from being drawn into terrorism (hereafter referred to as "Prevent") is incorporated into all relevant policies, procedures, systems, working practices and partnership arrangements.

The University has to give proportionate consideration to the need to prevent people from being drawn into terrorism when carrying out its everyday functions and duties.

The University takes its responsibility seriously to ensure the safety and wellbeing of students, staff, and the wider community. As part of this, it seeks to take all reasonable steps to prevent any university member from being drawn into terrorism. This Policy sets out the University's approach as part of our Safeguarding responsibilities in the [Safeguarding Statement of Policy](#).

The approach is mindful of our commitment to freedom of speech and academic freedom. It takes account of the [equality and diversity policy](#). The purpose is to promote informed decision-making and reduce the potential for unconscious bias via training, development, and awareness-raising.

The Prevent duty applies to other organisations, such as schools, childcare providers, FE Colleges, local authorities, health and social care providers and the police. The University has partnerships and close working relationships with other organisations subject to the duty.

Apprenticeships and initial teacher training are subject to Ofsted inspection, which inspects the Prevent duty provision in line with the inspection framework.

Contacts

The Head of Safeguarding Directorate of Student Resolution and Student Protection is responsible for the following:

- Providing advice and assistance in the implementation of the Prevent duty
- The development of Policy, Guidance and Templates
- Ensuring appropriate training is provided within the University

The Directorate can be contacted concerning the Prevent duty by emailing: safeguarding@canterbury.ac.uk

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Definitions

Prevent – the duty embedded in Section 26 of the Counter-Terrorism and Security Act 2015 and placed on certain bodies in exercising their functions to have “due regard to the need to prevent people from being drawn into terrorism.” It is called Prevent in this Policy.

Channel - a multi-agency approach to safeguarding, supporting and protecting children, young people and vulnerable adults at risk of radicalisation, extremism or terrorist-related activity.

Terrorism – any action that endangers or causes serious violence to a person or people; causes serious damage to property; or seriously interferes or disrupts an electronic system.

Radicalisation – Process by which a person comes to support terrorism and extremist ideologies associated with terrorist groups.

Extremism – the 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.

Academic freedom – the principle that academic staff 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 they may have at the provider (Higher Education and Research Act 2017 s14(7)).

Freedom of Speech - the principle that governing bodies are required to ‘take such steps as are reasonably practicable to ensure that freedom of speech within the law is secured for members, students and employees of the establishment and for visiting speakers’ (Education (No.2) Act 1986 s43). Freedom of speech includes written materials and other forms of expression and is not limited to the spoken word.

Vulnerable individual – an individual shown to be, on some significant level, a risk to themselves or others if assistance is not provided.

Leadership

The Governing Body is responsible for approving the annual accountability and monitoring return to the Office for Students (OfS) in compliance with the ongoing conditions of the University’s registration.

The University Senior Management Team is responsible for providing the Governing Body with an assurance of the University’s compliance with the Prevent duty. The Senior Management Team approved the Prevent Duty Policy.

The University Solicitor is the designated OfS Prevent Lead for the University. The Prevent Lead is responsible for reporting a matter relating to the University’s compliance with the Prevent duty as set out in the OfS’s monitoring guidance.

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The University's Prevent Monitoring Group:

- oversees the governance arrangements
- approves the University risk assessment and action plan annually
- reviews and approves the Prevent duty Guidance
- approves an annual report prepared by the Director of Student Resolution and Student Protection for consideration by the Senior Management Team and the Governing Body
- provides the required report to the Office for Students

The Group, chaired by the University Solicitor, reports to the Senior Management Team.

The Director of Student Resolution and Student Protection is the senior manager responsible for implementing the Prevent Policy on behalf of the Governing Body and Senior Management Team. The Director reports to the University Senior Management Team and Governing Body through the Prevent Monitoring Group annually.

The Head of Safeguarding supports the Director in implementing the Prevent Policy. The Head of Safeguarding holds responsibility for the operational delivery of Prevent-related activity.

Responsibilities of Staff

All staff members are responsible for reporting internally any concern about a person at risk of being drawn into terrorism.

The Prevent duty forms part of the University's Safeguarding arrangements. The University's approach addresses any student or apprentice at risk as a Safeguarding issue, handled under the care and concern procedures.

When there is a concern about a person at risk of being drawn into terrorism, there is a three-step process staff should follow:

1. Notice - if someone displays changes in their behaviour.
2. Check - There could be many different drivers behind these types of changes in behaviour, not just radicalisation. So, it is important to understand why these changes are happening before jumping to any conclusions.
3. Share - It is essential to share information to identify, assess, and manage risk effectively.

No staff member should judge whether someone is at risk of being drawn into terrorism but follow internal reporting procedures.

Staff members should not report any concerns externally but raise the matter with the Designated Safeguarding Lead or the Head of Safeguarding. A few key individuals carefully review a case before the Head of Safeguarding makes an external reference.

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Staff Training

Like all safeguarding responsibilities, everyone has a role to play. Therefore, all staff members must know about the Prevent duty and the University's obligations.

Relevant staff receive training to recognise those vulnerable to being drawn into terrorism and potential signs of radicalisation. The training explains how to appropriately and sensitively manage any emerging concern.

For those responsible for assessing specific concerns, primarily staff in Student Wellbeing and Designated Safeguarding Leads, there is specific training concerning differentiating the risk of radicalisation from other issues. It includes assessing the opportunities and requirements to share information confidentially where needed.

Designated key members of staff receive annual Prevent duty or Safeguarding training.

Student Union and Societies

The Students' Union's Chief Executive Officer (or nominee) is a Prevent Monitoring Group member. Through regular contact with the Students' Union, we ensure there is consultation with students on an ongoing basis on how we are implementing the Prevent duty.

The University works closely with the Students' Union over implementing policies and procedures that underpin compliance with the Prevent duty, including the Code of Practice on Freedom of Speech and External Speakers, and communication with students. There is close collaboration with the Students' Union concerning any controversial event one of its societies proposes.

The Students' Union provides an appropriate briefing for Union staff and elected officers.

Information for students and apprentices

The University provides a [Student and Apprentice Briefing](#). The briefing provides information on the Prevent duty and outlines what we do as a University.

Prevent Partners

The University collaborates with the DfE Regional Prevent Education Co-ordinator for FE/HE and the Kent and Medway Prevent Duty Delivery Board in meeting its obligations.

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Partner Institutions

Where students are registered with the University, but a partner institution undertakes the delivery of courses, the University is responsible for ensuring appropriate arrangements are in place for its registered students. It will identify the appropriate level of engagement and alignment of its arrangements across the different partnerships. We will proportionately undertake this alignment.

Where the University validates or accredits qualifications undertaken by students registered at another provider, the validated partner is responsible for its policies and procedures.

Where students study or undertake placements in a workplace, the risks and mitigating actions may differ from those in a campus setting. Where the partner institution is subject to the Prevent duty, the University will aim to align its arrangements with those that apply in the partner's setting as far as possible.

Risk Assessment and Action Plan

The University assesses the risk of individuals being drawn into terrorism. The Prevent Monitoring Group reviews this risk assessment annually.

The Prevent Monitoring Group considers what action might mitigate the impact/likelihood of that risk crystallising and include it in the Prevent Action Plan.

External Speakers and Events

The University has [policies and procedures for managing events and using University premises](#), including [online events](#). The [Code of Practice on the Freedom of Speech and External Speakers](#) reflects the Prevent duty. It sets out how we will ensure that we meet the different legal requirements to secure freedom of speech within the law. The Code balances the University's legal duties in ensuring freedom of speech and academic freedom and protecting student and staff welfare. The Code applies to all staff, students and visitors

The [Advice to Principal Organisers: Steps to be followed in Organising an External Speaker](#) set out what is required for any event to proceed. The principal organisers conduct due diligence. It includes considering carefully whether the views expressed, or likely to be expressed, constitute extremist views that risk drawing people into terrorism or shared by terrorist groups. Should this be the case, organisers must consider how they can be fully mitigated.

Encouragement of terrorism and inviting support for a proscribed terrorist organisation are both criminal offences. The University will not provide a platform for these offences to be committed.

If appropriate, the University will share information with other institutions about any particularly problematic event within the Prevent duty as a public interest task.

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Faith Spaces

The University provides pastoral care and religious facilities for those of any faith (or those without faith). In conjunction with the faith advisers, the Chaplaincy oversees the procedure for managing faiths/faith events and monitors their use.

The Chaplaincy makes an annual report on the use of faith spaces to the Foundation Group, chaired by the Vice-Chancellor.

Student Support

The University approaches the Prevent duty as part of our Safeguarding responsibilities set out in the [Safeguarding Statement of Policy](#).

Student support is available to students in a variety of ways. All students have a personal academic tutor. Student Wellbeing provides specialist support. Other departments contribute to the process: [Student Wellbeing](#) and [Mental Health Support](#), [Chaplaincy](#), [Information Technology](#), the Security Team, Facilities Management, timetabling, conferencing, and events.

The [Accommodation](#) Team supports those students in University accommodation.

IT Policies

IT Networks

We consider it unacceptable for our IT networks to be used in any way that supports, promotes or facilitates terrorism. We reference the Prevent duty in the relevant IT policies.

Filtering

We undertake limited filtering of websites. We block pages that threaten our IT systems. Also, we stop access to **illegal** websites relating to terrorism and sexual content. These are sites identified by the [Counter-Terrorism Internet Referral Unit \(CTIRU\)](#) and the [Internet Watch Foundation \(IWF\)](#).

We keep our [Internet Filtering Policy](#) under review.

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Online Activity

Online activity, including independent work, offers opportunities to provide a high standard of teaching and interaction with our students. Spending more time online makes our students more likely to access this content.

The University must remember its safeguarding duties relating to online working, including the Prevent duty. Unlawful and inappropriate content is widespread online. Social media services such as Facebook, Twitter, TikTok and Reddit provide new avenues for distributing and accessing extremist material. Should there be any misuse of the University's branding on social media accounts, we will take immediate action following the terms and conditions of the relevant platform.

Legal forms of online behaviours and content can also cause harm. Online working can lead to harassment, bullying or intimidation, especially among people in vulnerable groups. We explain our expectations for online working in our [Digital Code of Conduct](#) and [Social Media Guidelines for Students](#).

We promote activities with the Students' Union through our [Expect Respect](#) campaign. We also provide advice to students regarding [Safety Support and the SafeZone App](#).

The University established an Online Safeguarding Governance Panel. The panel oversees the University's strategy for promoting understanding and knowledge of policy and practice to safeguard students and apprentices online, and developing an online safeguarding culture, adopting best practices.

Monitoring

We do not monitor the use of websites or [emails](#). We have [Core Regulations for the use of IT](#). Only if there is a breach of the Core Regulations will we investigate. Where appropriate, we will take action and contact the person concerned.

Security Sensitive Research

The University recognises that the research and study of terrorism are valid and valuable, and staff and students should be able to undertake this without risk of prejudice. It may include using an electronic or physical 'safe room', as some funders require for certain security-sensitive research. There is a [Code of Practice for the Oversight and Use of Security-Sensitive and Other Sensitive Research Material](#).

Certain staff (and exceptionally students) need to access material which supports terrorism as part of their work. The responsible academic staff ensures that material is accessed appropriately for the research through the ethical review processes and will not place individuals at risk of being drawn into terrorism.

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Communications

The University will not permit material supporting terrorism to be displayed on University premises or its website. We will remove any such material when identified.

We will ensure our printed and electronic communications, including our website, do not contain or support terrorist material or material likely to encourage terrorism.

The Director of Marketing and Communications will immediately investigate all instances where anyone raises such instances.

Channel

Channel is a multi-agency approach led by the local authority (not the police or security service) to help support individuals identified as at risk for various reasons. It is a programme focusing on providing support at an early stage to people. It includes those identified as being vulnerable to being drawn into terrorism. Channel panels are concerned with preventing people from being drawn into criminal activity. They do not deal with crimes. They must consider referrals in line with the requirements to safeguard vulnerable individuals.

The Head of Safeguarding is responsible for all communication regarding Channel.

Information Sharing

We share personal information internally to ensure, for example, that a person at risk of being drawn into terrorism receives appropriate support. We share data when we consider it necessary and appropriate to prevent people from being drawn into terrorism. The Prevent duty statutory guidance for higher education institutions in England and Wales makes this an expectation, establishing a legal obligation to share such information internally.

The University utilises informal and formal information sharing opportunities with relevant authorities, including the Channel process. We have data-sharing agreements with key bodies within Kent and Medway to take a systematic approach to information-sharing in these circumstances. Information sharing will only occur with external authorities when this is consistent with the provisions of data protection legislation.

Where possible, we rely on consent before sharing information. There are circumstances when we must process data legally rather than based on consent. We set these out in the [Policy Statement on the Use of Applicant and Student Special Category Personal Data and Criminal Records](#) and [Policy Statement on the Use of Staff Special Category Personal Data and Criminal Records Data](#).

We assess information sharing on a case-by-case basis. We share the personal information necessary and proportionate to the intended outcome. Professional judgement by the Head of Safeguarding concerning the risks to an individual determines the necessity and proportionality of sharing information.

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Should the University identify someone potentially already engaged in illegal terrorist-related activity, the University Solicitor informs the appropriate public body.

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Document Owner	Director of Student Resolution and Student Protection
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