



The University of East London

Prevent Policy

1. Introduction

1.1 The Office for Students (OfS) monitors what higher education providers do to prevent people being drawn into terrorism. The government created two sets of statutory guidance to support the strategy, one of which is specifically for higher education bodies. 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 coordinators, local authorities or the police if necessary
- have systems for assessing and mitigating risks around external speakers and events on campus, 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 cover the Prevent duty
- engage with students and ensure that students' unions subsidiary groups and societies are aware of policies concerning activities on campus.

1.2 The Prevent policy applies to our partner institutions if they are also registered with the OfS or have more than 250 higher education students. Ofsted, rather than the OfS, is responsible for monitoring the implementation of the Prevent duty by further education or sixth-form colleges.

2. Scope

2.1 This Prevent Policy sets out how the University meets the Prevent duty as required under the Counter Terrorism and Security Act 2015. In accordance with the obligation of the Act and the Revised Prevent duty guidance: for England and Wales, the University undertakes a Prevent Risk Assessment yearly or as required and reviews its Prevent Action Plan accordingly. This policy is set out in the following three parts:

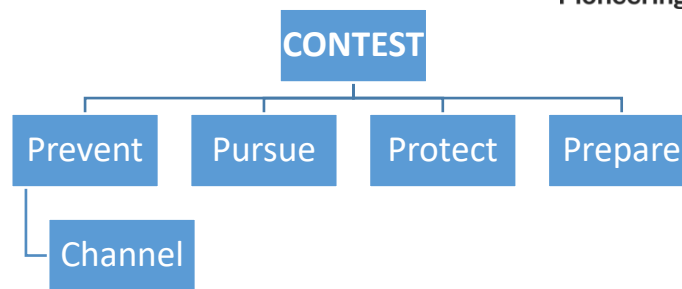
Part 1: Legal Context

Part 2: Implementing the Prevent duty on Campus

Part 3: Procedure for raising a Prevent duty concern on Campus

Part 1: Legal Context

1.1 Prevent strategy is part of CONTEST, the national counter-terrorism strategy and aims to reduce the threat to the UK from terrorism by stopping people becoming terrorists or supporting terrorism:



1.2 The Prevent strategy:

- responds to the ideological challenge of terrorism and the threat from those who promote it;
- prevents people from being drawn into terrorism and make sure that they're given appropriate advice and support;
- works with sectors and institutions where there are risks of radicalisation that we need to address.

2. Channel Programme and Referrals

2.1 The Channel programme is a key part of the Prevent strategy. The programme focuses on providing support at an early stage to people who are identified as being vulnerable to being drawn into terrorism. It uses a multi-agency approach led by the local authority to protect vulnerable people by:

- a) identifying individuals at risk;
- b) assessing the nature and extent of that risk; and
- c) developing the most appropriate support plan for the individuals concerned.

2,2 Channel referrals are considered by the relevant local authority and relevant partners at a Channel Panel Meeting. A Channel Panel works to safeguard vulnerable individuals whilst promoting positive community cohesion.

2.3 When required, the University's Channel Panel is overseen by the London Borough of Newham.

4. Balancing the Prevent duty and other legal duties and responsibilities at the University of East London

4.1 The University takes into consideration relevant legal duties and responsibilities in its implementation of the Prevent duty. The requirements of the Prevent duty are considered against the following legal duties and responsibilities:

- a) Education Act 1986 sec.43;
- b) Education Reform Act 1988;
- c) Human Rights Act 1998;
- d) Data Protection 2018;
- e) Freedom of Information Act 2000;
- f) Public Order Act 1986;
- g) The Equality Act 2010;
- h) Health and Safety at Work Act 1974;



- i) Terrorism Act 2000/2008;
- j) Counter-Terrorism and Security Act 2015.

4.2 Where relevant, the University's Prevent Policy should be read alongside the following University policies:

- a) Safeguarding Children and Vulnerable Groups
- b) FITNESS TO STUDY,
- c) Dignity at Study Policy
- d) Dignity at Work Policy
- e) Code of Practice to Ensure Freedom of Speech and Freedom of Expression,
- f) The University Data Protection Policy
- g) The University Freedom of Information (FOI) Policy
- h) The University Equality and Diversity Strategy and Policy
- i) University Complaint Procedure
- j) (Health & Safety at The University)

5. Governance

5.1 The University's Board of Governors has overall responsibility for the Prevent Duty. The Board of Governors delegated its responsibility for fulfilling the duty to the University's Executive Board.

5.2 The University's Prevent Working Group, chaired by the University's Prevent Coordinator, oversees the implementation and review of the University's Prevent Action Plan as well as the review of the Prevent Risk Assessment.

5.3 *In addition to this, the University's Prevent Coordinator and the Head of Security are tasked with assessing and mitigating any Prevent related risks yearly and/or as necessary.*

6. Monitoring and Review

6.1 The Prevent Policy and associated documents are subject to periodic update and review when required. The University produces its Prevent Annual Report yearly and as required, the report is submitted to Office for Students for auditing following approval by the Board of Governor.

6.2 Please contact the University's Prevent Coordinator [Jim Benson via j.benson@uel.ac.uk] for queries about this policy and the associated documents.

Part 2: Implementing the Prevent duty on Campus

1. Prevent Action Plan

1.1 The Prevent Action Plan is a public document which sets out a series of activities which the University plans to undertake in order to comply with the Prevent duty. The Action Plan is reviewed and updated yearly.

1.2 A copy of the University's Prevent Action Plan is available on request from the University's Prevent Coordinator [Jim Benson via j.benson@uel.ac.uk].

2. Information sharing (Prevent)

External Information Sharing



2.1 *The University of East London has a Prevent Information Sharing Agreement with identified external partners for the purpose of complying with the Prevent duty.*

2.2 The purpose of the Information Sharing Agreement is to ensure the lawful sharing of personal information as required under the Counter-Terrorism and Security Act 2015 and the Data Protection Act 2018.

2.3 Only the University's Prevent Coordinator or his/her nominee can share personal data with the University's identified external partners for the purpose of complying with the Prevent duty. The University's external information sharing partners for the purpose of complying with the Prevent duty are

- a) London Borough of Newham
- b) HE/FE Regional Prevent Coordinator(s);
- c) Metropolitan Police Service;
- d) Local Channel Panel

2.4 The University liaises with the University of East London Students' Union as appropriate on matters relevant to Prevent although they are not a formal information sharing partner in this respect.

Copies of the **INFORMATION SHARING AGREEMENT (EXTERNAL)** are available on request

Internal Information Sharing

2.5 Internally, personal data should only be shared within Departments and/or Schools at the University for good business reasons and/or where a student or staff member is at risk to themselves or others. In order to comply with the Prevent duty and the rules relating to Data Protection, the University has an Internal Information Sharing Protocol for Prevent related matters.

Copies of the **INFORMATION SHARING AGREEMENT (INTERNAL)** are available on request

3. Information Technology and Filtering

3.1 The University of East London acknowledges the right of staff and students to have the freedom to pursue a wide range of academic activities.

3.2 **The University Acceptable Computer Use Policy, Network Account Policy** and the **Electronic Mail Policy** outline the arrangements for the use of the University's computer facilities including consideration of filtering arrangements and of academic activities that might require online access to sensitive or extremism-related material.

4. Events and External Speakers

4.1 The University takes care to uphold its duty to ensure freedom of speech (within the law) on campus and its arrangements to protect the importance of academic freedom.

4.2 The University's policy in respect of freedom of speech clearly sets out the responsibilities of the University and those of the event organisers (internal or external) when planning an event on Campus or a University branded event off campus. It further sets out the University's procedures when arranging meetings and other activities on the University's



premises which might be deemed controversial by the nature of the speakers present or by the views which might be expected to be expressed.

4.3 In order to promote balanced and respectful debate the University will consider any of the following in order to mitigate any potential risk to the University:

- a) having an independent chairperson to facilitate an event and make sure a range of viewpoints can be heard;
- b) filming events to deter the use of unlawful speech;
- c) putting additional security in place;
- d) ticketing an event to prevent non-student violent protest;
- e) reviewing any promotional materials before the event; or
- f) training staff on how to facilitate well-balanced debate.

4.4 Permission to use University premises for events will only be granted to staff, students and external customers who undertake to comply with instructions issued by the University in relation to the location, arrangements for and conduct of such activities, including adequate stewarding and control of entry. The details of such arrangements are agreed in each individual case.

4.5 Staff and students responsible for infringements of or departures from these procedures may be subject to University disciplinary procedures. External customer responsible for infringements of or departures from these procedures may be barred from using the University's facilities.

4.6 Students' Union's subsidiary groups must follow the agreed protocol when using the University's brand for off-site events. No events shall be booked off campus in the University's name where an external speaker is present without the consent of the University Secretary.

4.7 Staff members must also follow the agreed protocol when using the University's brand for off-site events. All publicity using the University's name must be agreed by the University Secretary prior to its publication. No events shall be booked off campus in the University's name where an external speaker is present without the consent of the University Secretary.

5. Freedom of Speech

5.1 The University has procedures relating to meetings and other activities on its premises which might be deemed controversial by the nature of the speakers present or by the views which might be expected to be expressed.

5.2 The University defines 'Controversial' to mean a meeting or other activity where there is a real possibility that the speaker may not be able to enter or leave the building safely and/or deliver a speech properly unless special arrangements are made.

5.3 If any doubt exists about whether the Freedom of Speech procedures apply to meetings or other activities, organisers should consult the University Secretary in good time. The final judgement of those matters is vested in the University Secretary.

5.4 Appeals against the ruling of the University Secretary may be made to a special committee comprising at least three members of the Board of Governors and one member of



the University Executive Board. The advice of the Ethics Advisory Committee may be taken on whether a speaker or an event should be permitted on campus.

5.5 Requests involving speakers from outside the University must be made no more than three months and no less than ten working days in advance of the meeting. Requests will be accepted from members of staff and registered students of the University, and should be made with the University Secretary or his/her nominee by completing the University's Freedom of Speech form,

5.6 Requests made by Students' Union subsidiary groups involving speakers from outside the University must be submitted to University of East London Students' Union. Requests from other students involving speakers from outside the University must be submitted to the Head of Student Life. However, it is still expected that the University's Code of Practice to Ensure Freedom of Speech and Freedom of Expression will be adhered to.

5.7 Organisers of meetings and other activities who wish to invite an external speaker should refer to the '**Code of Practice to Ensure Freedom of Speech and Freedom of Expression**'.

For a copy of '*Code of Practice to Ensure Freedom of Speech and Freedom of Expression*'. Please visit: <https://www.uel.ac.uk/about/governance/freedom-information>.

6. Academic Freedom and Sensitive Research

6.1 The University recognises that academic staff at the University have freedom within the law both to question and test received wisdom and to put forward new ideas and controversial or unpopular opinions without placing themselves at risk of losing their jobs or privileges. It is further recognised 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 University Secretary.

6.2 Details of visiting lecturers should be made available to and approved by the University Secretary or his/her nominee.

7. Prevent Training

Staff

7.1 The University's Prevent Training Plan requires all relevant staff to undertake the Prevent Duty training as appropriate to their role.



7.2 The aim of the briefing session is to raise awareness of the Prevent duty and the University's pathway for reporting Prevent duty concerns. The session informs staff members of the University's Prevent duty and Prevent reporting procedure.

7.3 Staff members are required to have a refresher every 3 years.

Students

7.4 Where relevant, students who undertake a placement as part of their programme of study may be required to undertake Prevent training before their placement commences. Students who undertake a placement with one of the highlighted 'specified authorities' listed below, will need to undertake such training.

- a) Local Authorities;
- b) Schools;
- c) Further Education Institutions;
- d) Higher Education Institution;
- e) The Health Sector;
- f) Prisons and Probation Services;
- g) The Police.

Part 3: Procedure for raising a Prevent duty concern on Campus

1 The Prevent Coordinator is responsible for the operational management of casework which may arise as a result of the Prevent duty. This includes managing and coordinating relevant welfare and academic support services internally as well as external welfare support (e.g. local authority services, NHS and / or various charities) and / or Channel referrals.

2 When a Prevent duty concern is raised, it is important that such a concern is shared in a safe and supportive manner to enable the concern to be effectively assessed for the appropriate intervention to be put in place.

3 Where a student, staff member or third party is concerned that a student is expressing violent extremist views or is at risk of being drawn into terrorism, these concerns should be passed to the University's Prevent Coordinator. The Prevent Coordinator will carry out an initial 'Prevent Incident Assessment' seeking to gather substantive information and evidence which would allow for full consideration of the case.

4 Once any available information and substantive evidence has been gathered, the Prevent Coordinator will consider the material in discussion with other members of staff, where relevant. A decision will be made as to the seriousness of the case and four potential outcomes are likely at this stage:

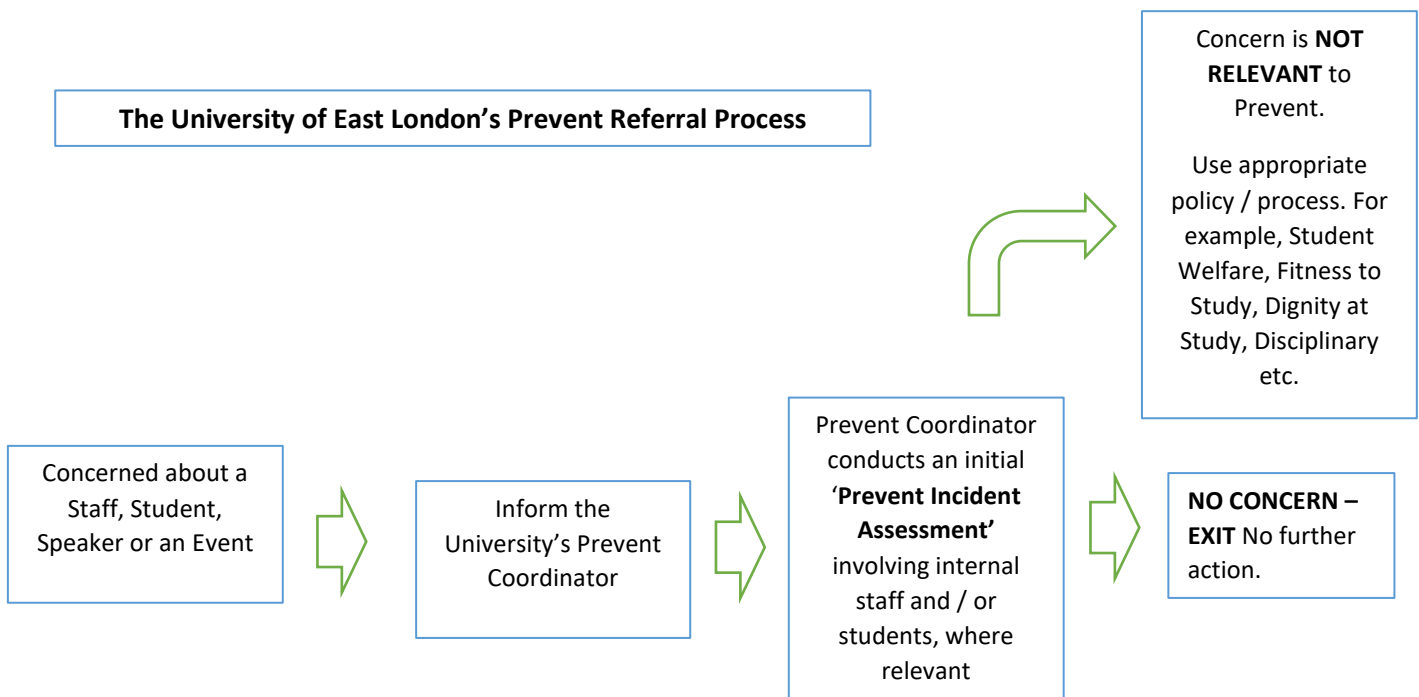
- a) Concern is **NOT RELEVANT** to Prevent but may be relevant to another University policy. In such a case, a referral will be made to the appropriate policy / process. For example, Dignity at Study Policy
- b) Concern is **RELEVANT** to Prevent but not serious enough for a Channel Referral. In such a case, Prevent related welfare action(s) will be put in place such as case specific internal welfare / academic arrangements – counselling or mental health referral, medical referral, chaplaincy referral etc.;
- c) Concern is **RELEVANT** to Prevent and the case is serious enough to be **referred to the local Channel Panel by the Prevent Coordinator**;
- d) **NO CONCERN and EXIT**. No further action is needed.

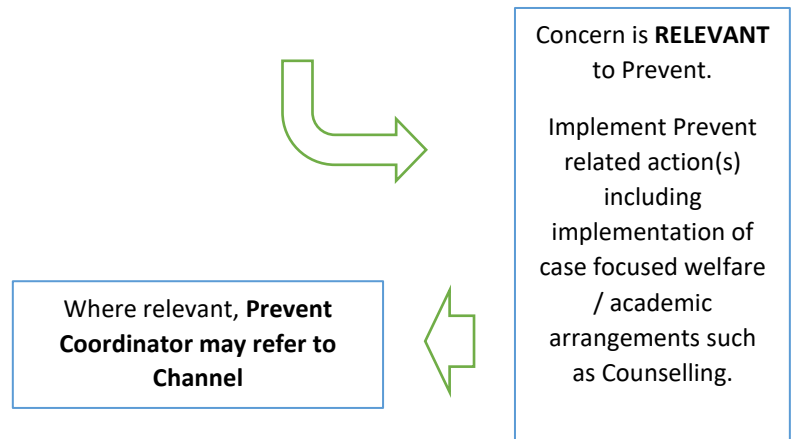


5 In reaching a decision to share any information with third parties the University will comply with the requirement of the Data Protection Act and abide by its external Prevent Information Sharing Agreement. Internally, personal data can only be shared within the University for good business reasons.

3. Prevent Referral Flow Chart

Please refer to the flowchart below for the University's Prevent Referral Process





Staff and students are not expected to decide whether there is a genuine risk or to challenge the individual about their concerns. What is important is to refer any concerns under this process. Please contact the University's Prevent Coordinator [Jim Benson via j.benson@uel.ac.uk or telephone +44(0)20 8223 2091 or M +44 (0)7547670783]