Prevent Policy

Version Control

Version Number	UEB Sponsor	Approval Body/Officer	Date of approval
V_03	Chief Operating Officer & University Secretary	UEB	12/11/2024

This document is available in Welsh.

1. PURPOSE

1.1 The purpose of this policy is to outline the University's responsibilities under the Counter-Terrorism and Security Act 2015[1], specifically in relation to the Prevent Duty.

1.2 The Prevent Duty is a key element of the UK Government's counter-terrorism strategy, aimed at reducing the threat of terrorism in the UK by preventing individuals from becoming terrorists or supporting terrorist activities.

1.3 This policy outlines Cardiff University's approach to ensuring compliance with the Act and the Prevent Duty, its procedures for addressing concerns raised within the University community, and its role in contributing to any multi-agency response to such concerns

2. SCOPE

2.1 This Policy applies to all Cardiff University students, staff, visiting speakers, honorary positions, and those engaged in business on behalf of the University.

2.2 For the purposes of this policy, the following definitions will apply:

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'.
Extremism: 'Vocal or active opposition to values, including democracy, the rule of law, individual liberty and mutual respect and tolerance of different faiths and beliefs.'
Radicalisation: 'The process by which a person comes to support terrorism and forms of extremism leading to terrorism'.

3. POLICY STATEMENT

3.1 Cardiff University is committed to upholding both freedom of speech and academic freedom, while also ensuring the protection and safeguarding of its students and staff from the risk of being drawn into terrorism. This policy sets out the University's commitment to preventing students from becoming involved in terrorism, acknowledging that terrorism can be linked to a variety of ideologies.

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[1] Home Office (2015) Counter-Terrorism and Security Act 2015 https://www.gov.uk/government/collections/counter-terrorism-and-security-bill

3.2   Encouragement of terrorism and/or soliciting support for a proscribed organisation is a criminal offence. This policy sets out our approach to the specific elements and provisions of the Act as they apply to higher education providers, as well as our more general approach to issues around the vulnerability of our staff and students regarding harassment or radicalisation from any source, and relevant measures which enable our students to learn in safe and intellectually stimulating environments.

4.   POLICY

Risk Assessment

4.1   In accordance with the statutory guidance for higher education providers Cardiff University will set out a risk register/assessment and action plan which will be[2] reviewed regularly. This will include satisfying itself and the Government that appropriate policies and procedures are in place to help identify and support any individual who may be vulnerable and provide clear management oversight of risks.

Engagement

4.2   Cardiff University will actively engage with other partners including the South Wales Prevent board, which we were a founding member of, as we recognise that issues around radicalisation do not respect institutional boundaries. Through this Board, we will work in partnership with local Universities across the region, including government and security services to share information and best practice.

Referrals

4.3   The University will seek to identify vulnerable individuals within the community at an early stage and ensure they are given appropriate support and welfare provisions. The University's responsibilities will be managed initially through our existing safeguarding approach[3].

4.4   The University will ensure that staff and students are informed of the process for referring concerns about individuals. Any member of staff or student may raise concerns about someone within the University community who appears vulnerable to the risk of being drawn into violent extremism, based on observed behaviour or information received. Details of this process are outlined in Appendix A.

4.5   Where a specific risk is identified the University Prevent Group will assess that risk and advise on action accordingly. Terms of reference for this group are available at Appendix B.

4.6   Any member of the University community who has a concern that a student may be at risk or abuse, or exploitation should refer initially to Student Services through the usual reporting route. Initial concerns that a staff member may be at risk should be referred to the relevant HR contact, who will where appropriate inform the Director of People and Culture (or delegate). 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.

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[2] Practising your religion - Study - Cardiff University
[3] Safeguarding children and adults at risk - Public information - Cardiff University

Support Services and Chaplaincy

4.7   The University will provide professional student support services, and each student will be assigned a personal tutor as outlined in the University's commitments in the Student Charter[4]. This is a key element of Cardiff University's safeguarding strategy, ensuring that any concerns identified through these interactions can be appropriately referred for further support or action

4.8   The University will provide spiritual and chaplaincy support for students. This will include multi-faith chaplaincy provision and prayer /reflection space. These rooms are operated in accordance with our Quiet Room Policy[5]. The University will also liaise with local faith groups to ensure integration with the local community

External Speakers and Events

4.9   The University will ensure that it has an appropriate Code of Practice for External Speakers[6] which is regularly reviewed. This Code of Practice will detail the necessary risk assessments that must be completed. These assessments will enable to university to consider protecting people   vulnerable from being drawn into terrorism by direct exposure to unchallenged extremist views that are counter to our commitment to both student and staff safety and equality and diversity.

4.10   Where risks are identified which raise a concern around the University's Prevent Duty, the matter will be referred to the Prevent Strategy Working Group so that appropriate and proportionate control measures can be identified.

Students' Union

4.11   The University will work closely with Cardiff University Students' Union to ensure that the policies the University develops in this area are supported, where appropriate, by the Students' Union.

Information Technology

4.12   The University has in place a University IT Acceptable Use Policy which applies to all use of all IT facilities. We set out in that policy a range of activities that would be of concern to us including issues that arise from the University's statutory duty under the Counter Terrorism and Security Act 2015. This includes the creation, download, storage, transmission or display of material that promotes or incites racial or religious hatred, terrorist activities or hate crime; or instructional information about any illegal activities.

4.13   The University uses filtering as a means of restricting access to inappropriate content. This can include partial filtering whereby an IT user is shown a warning before opening potentially inappropriate content.

Research Ethics

4.14   Research which involves human participants, human material or human data, including such research that is extremism related will adhere to   our Research Integrity and Governance Code of Practice[7], which requires that a risk assessment is undertaken for each research study to determine the potential risks to the organisation, the research, the safety and wellbeing of the participants and researchers, and identify the legal and ethical requirements governing the research.

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[4] Read our Student Charter - New students - Cardiff University
[5] Practising your religion - Study - Cardiff University
[6] Freedom of speech - Public information - Cardiff University
[7] Research Integrity and Governance: Research integrity and governance - Research - Cardiff University

Data Sharing

4.15 In reaching a decision to share any information with third parties the University will adhere to the Data Protection Act 2018.

4.16 The University will also establish a formal data sharing agreement with the South Wales Prevent Board to enable it to discharge its duties under the Counter Terrorism and Security Act 2015.

Staff Training

4.17 The University will ensure that appropriate training is offered to staff. We will prioritise staff most likely to require awareness of the Prevent agenda (e.g. security services management, student support professionals, students' union staff, chaplains) and will monitor and continue to refresh this on an annual basis.

4,18 Where appropriate the University's HR team may also be consulted to identify staff requiring an awareness of the Prevent agenda.

5. ROLES AND RESPONSIBILITIES

5.1 The Chief Operating Officer and University Secretary is the University Executive Board Sponsor for this policy.

5.2 Compliance and Risk Team (University Secretary's Office) is the policy owner.

5.3 The Director of Student Life is the nominated Prevent lead/coordinator for the University and is responsible for convening a Prevent Panel (see Appendix B) in response to a concern raised in relation to an individual who may be at risk of being drawn into violent extremism.

5.4 The University Safeguarding Group supports the development and monitoring of our institution wide approach to creating and maintaining a safe community and safeguarding individuals which includes Prevent.

5.5 The Prevent Working Group (see Appendix B) will review updates on institutional risk assessments, monitor the implementation of the Prevent Policy, advise on appropriate staff training and track completion rates, formally review the Prevent Policy every three years, and support the completion of the annual return to Medr.

5.6 The University UEB Sponsor of this policy shall ensure that such steps as appropriate (including training) have been taken to ensure that senior leaders are aware of the requirements and the implications of this policy and require them to disseminate information to staff involved with policy decision making in their respective areas.

6. RELATED POLICIES

6.1 This policy forms part of a wider advice framework relating to safeguarding and wellbeing of staff and students.

6.2 It has a relationship with other University policies specifically –

- Safeguarding Children and Adults at Risk
- Dignity at Work and Study policy
- Code of Practice on Freedom of Speech
- Student Conduct Regulations
- Religion and Belief policy

- [Quiet Rooms Policy](#)

7. QUERIES

7.1 For any questions or queries regarding this policy please contact the Compliance and Risk team via email - complianceandrisk@cardiff.ac.uk

8. MONITORING AND REVIEW

8.1 This policy will be informally reviewed on an annual basis by the Policy Owner and formally every 3 years.

8.2 The Prevent Working Group will monitor the implementation of the policy, associated action plans and risk assessments (see [Appendix B](#)).

9. VERSION CONTROL INFORMATION

Document Name	Prevent Policy
UEB Policy Sponsor	COO and University Secretary
Policy Owner	Head of Compliance and Risk
Policy Author(s)	Ian Johnson, Compliance Officer Compliance and Risk Team, University Secretary's Office Simon Wright, Academic Registrar
Version Number	V0_3
Equality Impact and Welsh Language Assessment Date	TBC
Privacy Impact Assessment Date (where applicable)	N/A
Approval Date	Day/month/year
Approved By	Vice-Chancellor (UEB) *or* Committee name [complete as appropriate]
Date of Implementation	*Day/month/year*
Date of Last Review	*Day/month/year*
Date for Next Review	*Day/month/year*

Change History Record

The table below should be completed by the Author each time a change is made to the policy

Version amended and date of review	Reviewer(s)	Description of Change	Version created
V0_3	Ian Johnson Thomas Tudor Jones & Catrin Morgan, Compliance and Risk, USO.	Updated to new template. Broken hyperlinks restored/update	01/09/2024

Appendix A – Referral Process

In the event behaviour exhibited indicates a need for further consideration or intervention the process of referral should generally be as follows:

I.   The specific concern should be raised initially with an appropriate member of staff within the Academic School or Professional Services Department (e.g. Head of School, line manager). The senior member of staff should then report via the University's Report and Support tool. This will then initially be assessed by the Student Support and Intervention Team in Student Life.

II. A panel may be convened to consider all available options based on this risk analysis and come to a decision as to whether the individual is referred to the Channel[8] process.

III. The University Prevent Coordinator may consult with external statutory authorities to assess relative risks or determine if individual concerns should first be addressed through internal safeguarding measures. For students, this may involve Student Support, and for staff, Human Resources may be engaged.

IV. If there is an immediate concern where a person's physical wellbeing is under threat the correct referral process is to call 999 and then inform the University Prevent Coordinator at the earliest opportunity.

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[8] The UK government position on Channel and related guidance is set out here:
https://www.gov.uk/government/publications/channel-guidance

Appendix B – Safeguarding Group and Prevent Panel

The Director of Student Life will lead a multi-disciplinary panel to monitor compliance across the University. Membership of the Working Group and Panel is composed of:

- Director of Student Life, who will be Chair
- Director of People and Culture
- Head of Compliance and Risk
- Head of Security
- Students' Union representative

All Panel members may elect to send a delegated nominee.

Prevent Working Group Terms of Reference

I. The group will consider updates on institutional risk assessments and actions and monitor implementation of the Prevent Policy.
II. The group will advise on the appropriate staff that would benefit from training and receive reports on completion rates.
III. The working group will formally review the prevent policy every 3 years.
IV. The working group will support the completion of the annual return to Medr.

Prevent Panel Terms of Reference

I. The Prevent Panel will be convened where necessary by the University Prevent Coordinator, in response to a concern raised in relation to an individual who may be at risk of being drawn into violent extremism.

II. The Panel will consist of the individuals mentioned above (as appropriate), but the Chair may request other relevant members of staff attend the meeting, as appropriate, to offer further information and / or advice.

III. The Panel will be convened on a case-by-case basis and will make a decision as to whether an individual case is referred to an external agency for further support, to the Channel Panel process, or is referred back to existing welfare and safeguarding provisions within the University.

IV. Where a concern is severe an immediate referral, outside of the Prevent Duty Referral Panel, to the authorities can be made, particularly if it is determined that a significant risk of harm exists.

V. The Panel will record referrals in its register to support completion of its annual return to Medr.