

SWANSEA UNIVERSITY PREVENT POLICY

**ORIGINALLY DEVELOPED 2016
LATEST UPDATE OCTOBER 2023**

Update	Date By	PAT	Sign Off
Reflected latest Home Office Guidance (April 2021)	October 2023	<u>Cheryl Pierce</u> Head of Safeguarding/ Prevent Coordinator	October 2023
Updated Memberships reflect new University Roles & titles	October 2023	<u>Cheryl Pierce</u> Head of Safeguarding/ Prevent Coordinator	October 2023

Consultation Process	Dates	Approval
Prevent Assurance Team	Aug 2015-Feb 2016	Approved
Governance Section	Jan 2016	Approved
Legal and Compliance Officers	Jan 2016	Approved
University Research Ethics Committee	Feb 2016	Approved
Chaplaincy	Jan 2016	Approved
Mosque Management Committee	Aug 2015 – Feb 2016	Approved
SUSU	Oct 2015- Feb 2016	Approved 26/02/16
All Wales Prevent Coordinator (BIS)	Feb 2016	Approved
Registrar	Feb 2016	Approved
Equality Office	Feb 2016	Approved
The College (Navitas)	Feb 2016	Approved
Unions		
SMT		
UMB		
Council		

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1. Introduction

Swansea University is committed both to protecting freedom of speech and academic freedom and to protecting and safeguarding its students & staff from the risk of being drawn into terrorism. This policy outlines Swansea University's commitment to preventing students from being drawn into terrorism. In doing so we recognise that terrorism can be associated with a range of ideologies. A definition of terrorism is provided below (2).

1.1 Policy Statement

The Policy of the University is to comply with the Counter Terrorism Act (CTA 2015). In particular, the University will ensure that it has in place appropriate arrangements to discharge the specific statutory duty set out in Section 26 (1) CTA 2015 "To have due regard to the need to prevent people from being drawn into terrorism." Further updated 1st April 2021 with Statutory guidance: "**Prevent duty guidance: for higher education institutions in England and Wales.**"¹ In exercising this duty, the University will have particular regard to other statutory duties to (a) ensure freedom of speech (The Education (No.2) Act 1986); and (b) have particular regard to the importance to academic freedom (Education Reform Act 1988). The University must provide HEFCW (the appointed Monitoring Body) any information it may require for the purposes of monitoring the University's performance in discharging the duty imposed by Section 31, including information which specifies the steps that will be taken by the University to ensure that it discharges the duty imposed by Section 31. The University will participate in and cooperate with the appropriate local monitoring panel.

1.2 Scope

This Policy applies to all individuals who come into contact with Swansea University, including, but not limited to: Swansea University students, staff, visiting speakers, honorary positions, and directors, as well as all Swansea University Students' Union clubs, societies, course representatives, volunteers, sabbatical officers, and Board of Trustees.

2. Definition of Terrorism

For the purposes of this policy, terrorism is defined as the use or threatened use of violence for the purpose of advancing a political, religious, racial, or ideological cause.

3. Principles

3.1 Swansea University is committed to fostering an inclusive environment in which the principles of academic freedom and of freedom of speech underpin our mission.

3.2 Swansea University is committed to ensuring vulnerable individuals are safeguarded from being drawn into terrorism.

3.3 Swansea University will seek to identify, protect, and support individuals who it believes may be at risk of being drawn into terrorism.

3.4 Swansea University discharges this responsibility in partnership with other agencies, including the Police, Local Authorities, and the network of regional Prevent co-ordinators.

3.5 Swansea University will contribute to the multi-agency Prevent agenda.

¹ Prevent duty guidance: for higher education institutions in England and Wales - GOV.UK (www.gov.uk)

4. Institutional Duties

4.1 The University, at a senior management level, will actively engage with other partners including police and DfE HEFE Prevent Co-ordinators.

4.2 The University will make use of internal mechanisms to share information about Prevent across the institution.

4.3 The University will ensure that staff will be provided with appropriate training, specific to their needs in accordance with statutory requirements.

4.4 The University will carry out a risk assessment proportionate to the size and complexity of the institution. 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.

4.5 On the basis of the risk assessment, the University will develop an action plan to address actions which need to be taken to mitigate potential risks.

4.6 The University will ensure that staff and students are made aware of the process for referring concerns regarding individuals (**Appendix 4**).

4.7 The University will provide sufficient spiritual and chaplaincy support for students. This will include multi-faith chaplaincy provision and prayer / reflection space. The University will also liaise with local faith groups to ensure integration with the local community.

4.8 The University will work closely with Swansea University Students' Union to ensure that the policies the University develops in this area are supported, where appropriate, by the Students' Union (**Section 5**)

4.9 The University will ensure that it has due regard to the duties specified in the [CTA Statutory Guidance](#).

4.10 The University will ensure that it maintains a "Security Sensitive" Research Archive that records all relevant research activity and those staff and students involved in such research.

4.11 The University will ensure that it has an appropriate [Code of Practice for External Speakers](#)² which is regularly reviewed.

4.12 The University will ensure that any event that hosts a speaker or event where there is potential for extremist views that risk drawing vulnerable individuals into terrorism or views shared by terrorist groups will be balanced by hosting speakers of opposing opinions at the same event.

5. Students' Union

5.1 Both the Students' Union (under the Charities Act³) and the University are responsible for protecting students on campus from dangerous or radicalising bodies. Although the National Police Chiefs' Council document and GCR makes it clear that this is a shared responsibility, the overall control of access lies firmly with the University in the final instance and under the 2015 Act and the updated guidance from April 2021, the Students' Union is specifically subject to the University's Prevent Policy.

² Freedom of Speech Policy

³ [Chapter 5: Protecting charities from abuse for extremist purposes - GOV.UK \(www.gov.uk\)](#)

5.2 The Students' Union is required to have specific policies stating which activities are, and are not, permitted by students and this is to include on-line activities. The Students' Union has a duty to challenge extremist concepts that legitimise terrorism and are to maintain records of such activity or issues. They are to have a direct working relationship with the University-appointed Prevent Coordinator (who is the Head of Safeguarding). To enable this key process and cross-university working relationships, Students' Union staff will receive appropriate Prevent training packages and risk briefing, in common with Student Life staff. The Chief Executive Officer of Swansea University's Students' Union will also be a member of the South Wales Higher Education Prevent Forum thus ensuring awareness of current risk and intelligence briefings and student representation.

5.3 In order to ensure student protection, the University requires that the Students' Union, acting with the University, complies with the following:

5.3.1 Access and Control

I. No religious, spiritual or ideological event hosted by students may be permitted unless hosted by a recognised Students' Union society.

II. Any society wishing to host such an event will speak first to the Students' Union officer concerned who will then, if considered necessary (see Event Protocol **Appendix 6**), pass the booking on to the Prevent Coordinator for consultation, detailing the speaker's information, using the Initial Speaker Enquiry Form proforma provided at least 14 days in advance of the planned event (**Appendix 7**).

III. The Prevent Coordinator will action a check on all events, and proposed speakers using both 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.

IV. External bookings from conferences, hospitality and academic speakers (included in 4.12 above) are treated in the same way thus ensuring that the University knows at all times who is on campus and why, in compliance with statutory security legislation (Swansea University's [Freedom of Speech Code of Practice](#))

V. External leadership of a student society is not permitted.

VI. All speakers addressing students or staff dealing with religious, spiritual or ideological issues who have been RAG/SPOE vetted and approved, must comply with Swansea University's [Freedom of Speech Policy](#).

VII. Prayer rooms are to be managed under **Prayer Room Protocol** which includes other spaces used for worship or religious purposes.

VIII. Any contentious or security issues that might affect the safety of staff or students or the reputational integrity of the University are referred to the Registrar, the PVC for Education (who is the Prevent Lead) and the Prevent Assurance Team.

Policy Review

The Prevent situation in terms of both statutory regulation and emerging risk factors is changing rapidly. It is essential therefore that this policy and associated procedures are kept under review. Significant changes to policy will be subject to Council Approval.

Appendix 1
Processes to Ensure Implementation, Application and Compliance

1. Prevent Implementation and Assurance Leadership

The PVC for Education has direct overall responsibility as Prevent Lead and has the authority to delegate to appropriate staff some or all of the actions required of the Prevent Lead under the Duty. The Head of Safeguarding is the single named person titled Prevent Coordinator (PC) as required by the 2015 Act and updated Guidance April 2021. These post-holders deal with immediate risk assessments in conjunction with advice from security services and routine updates.

Prevent Assurance Team

The University Prevent Coordinator (PC) will lead a multi-disciplinary Prevent Assurance Team (PAT) for integrated Prevent monitoring and compliance across the University.

Membership is composed of:

- Pro Vice Chancellor Education,
- Director Estates & Campus Services,
- Chief Information Officer,
- Health, Safety and Resilience Manager,
- The CEO of the Students' Union,
- Head of Campus Life.
- Director of The College Swansea

Terms of Reference

- Meet as required to review and provide updates to the Prevent Risk Assessment and Action Plan.
- Receive Security Updates.
- Direct the implementation of Prevent compliance across the University.

Prevent Assurance Group

The Prevent assurance Group will be led by a member of the Prevent Assurance Team, to ensure that relevant Prevent Duty information is cascaded throughout the organisation.

Membership is composed of:

- Chaired by a member of the Prevent Assurance Team
- College Safeguarding Officers
- SUSU FTO's
- SU Faith Leaders
- International Development Office representative
- Strategic Partnerships representative
- University Unions representative

Terms of Reference

- Meet once per term
 - Receive updates on Prevent Risk Assessment and Action
 - Provide updates on Risk Assessment and Action relevant to their areas if appropriate.
 - Cascade information to ensure compliance
- (**Appendix 5** describes the Prevent Assurance Structure and Governance within Swansea University).

2. Referral of Concerns Regarding Radicalisation

Any member of the University (student or staff) may identify concerns about an individual potentially being drawn into extremism based on information received or behaviour observed.

It is important that such concerns can be shared in a safe and supportive fashion to enable concerns to be investigated and an appropriate intervention to be developed, if required.

It is equally important that assumptions are not made based on information received and that referrals are investigated thoroughly and fairly.

The University will seek to approach such concerns from the perspective of safeguarding the individual about whom concerns have been expressed.

Only where there is compelling evidence of a requirement to do so will information be shared with other agencies.

3. The Concern Reporting Process (Flow Chart Appendix 3)

- Where a student or staff member has concerns that an individual is expressing extremist views or is potentially vulnerable to being radicalised into extremism these concerns should be passed on to the Head of Safeguarding or in their absence the Safeguarding Team by completing Swansea University's [online reporting form](#).
- The Head of Safeguarding or nominated Deputy will investigate the matter, seeking to collate substantive information and evidence which will allow full consideration of the concerns.
- The Head of Safeguarding (PC) or nominated Deputy will consider the substantive evidence in discussion with other members of the University, where relevant, through convening the **Prevent Duty Referral Panel (Appendix 4)**
- A decision will be made as to the seriousness of the case. Three potential outcomes are likely at this stage:
 - (i) **No further action is required.** In this case a confidential record of the case will be kept by the Head of Safeguarding and the PVC for Education (PL) would be notified that a case had been investigated but no further action is required.
 - (ii) **There is substance to the case but at this stage only internal action is required.** The exact nature of the intervention required would be determined by discussion between relevant staff members. Actions and a review date will be agreed. At the review, the case would be assessed again and the appropriate actions taken. It is anticipated that in the majority of cases the intervention would be supportive and of safeguarding in nature and fall under the remit of Student Life or HR for staff. As above, the PVC for Education (PL) and Registrar will be fully briefed.

(iii) A referral to the police is required because there are serious and immediate issues of safety to the student or others, and / or there is evidence to suggest a criminal act may be committed or has been committed. This decision would be taken only in the most serious of circumstances and only by the PVC for Education or Registrar or by delegated authority in their absence.

4. Information Sharing

- In reaching a decision to share information with third parties **(as per 3.4 above)** Swansea University will adhere to its [Data Protection Policy](#) and its eight Data Protection Principles.
- In following the referral process, (outlined in **Appendix 1**) there may be instances where Swansea University is sufficiently concerned by an individual's behaviour and the risk they potentially pose, that it will need to share these concerns with external agencies. This may include referral to the [Channel Programme](#), or in serious circumstances, the Police.
- In sharing such information with external parties, Swansea University will securely share only sufficient and relevant information in order to allow the concern to be appropriately followed up.
- Swansea University will keep confidential records of the information shared. These will be kept in accordance with the Data Protection Act (1998).

Appendix 2

1. The Law affecting HEIs in relation to radicalisation.

- The UK Human Rights Act [1998](#)
- The Data Protection Act [1988](#)
- The Race Relations [Act \(Amended\) 2000](#)
- The Racial and Religious Hatred [Act 2006](#)
- The Prevention of Terrorism [Act 2005](#)
- The Terrorism [Act 2000 / 2008](#)
- The Equality [Act 2010](#) (Wales inclusions 2011)
- The Counter Terrorism and Security [Act \(2015\)](#)
- Prevent duty guidance: for higher education institutions in England and Wales April 2021 [Prevent duty guidance: for higher education institutions in England and Wales - GOV.UK \(\[www.gov.uk\]\(http://www.gov.uk\)\)](#)

2. Policies affecting HEIs in relation to radicalisation

There exists a range of policy documents issued from, or in relation to, the Home Office which directly relate to universities in relation to the Prevent Agenda including:

(i) Promoting Good Campus Relations (Universities UK/Equality Challenge Unit/SCOP) [2005](#) & Institutional Imperative Update 2013.

(ii) Religious Observance in Higher Education. Equality Challenge Unit [2009](#).

(iii) Umar Farouk Abdulmutallab: Report to UCL Council of Independent Inquiry Panel [2010](#).

(iv) HM Prevent Strategy [2011](#).

(v) Prevent, Police and Universities: [Guidance for Police Staff to Help Higher Education Institutions Contribute to the Prevention of Terrorism. ACPO 2012](#).

(vi) Developments in Counter-Terrorist Measures and Uses of Technology. Prof Helen Fenwick 2012.

(vii) Oversight of Security-Sensitive Research Material in UK Universities. [Universities UK 2012](#).

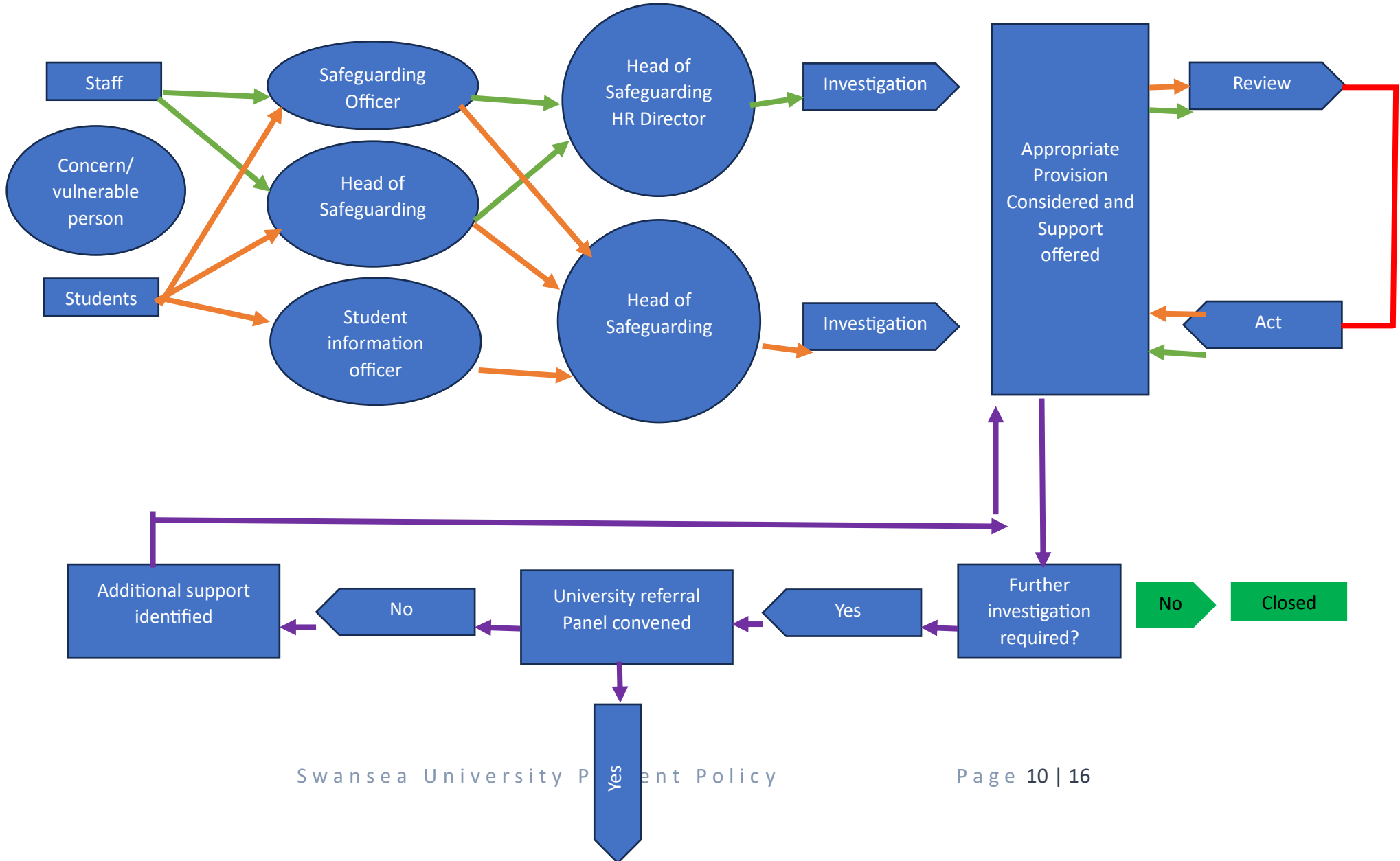
In support of our approach to 'Prevent' on campus Swansea University have also incorporated the duty into and development of the following:

(i) Code of Practice on [Freedom of Speech 2012](#) (Amended 2014)

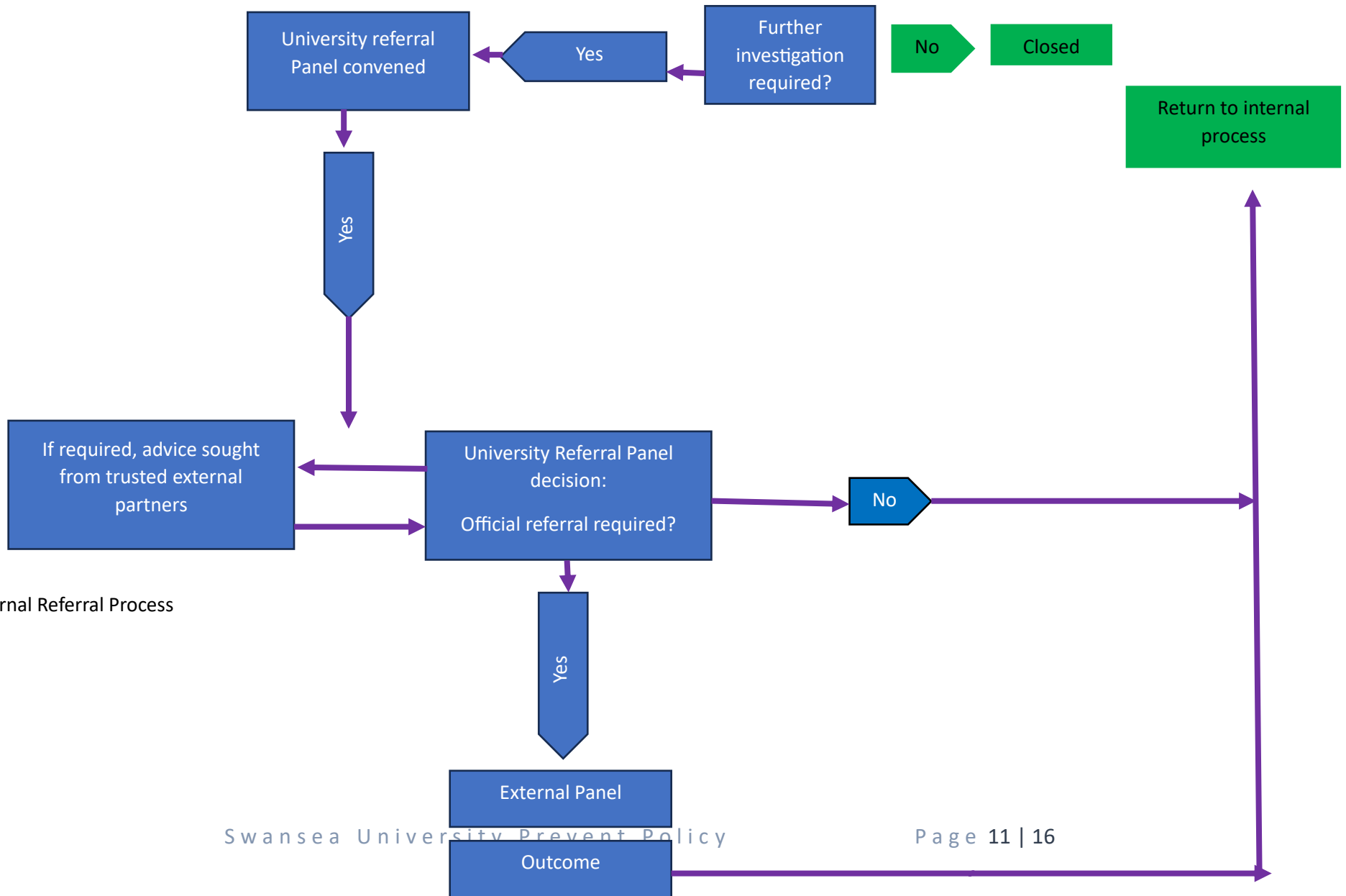
(ii) [Safeguarding Policy](#): Protecting Children and Adults at Risk (July 2023)

**Appendix 3:
Process for Reporting Concerns Regarding Radicalisation**

Internal referral process



Referral Process Advisory Period



Appendix 4
Prevent Duty Referral Panel

Swansea University Prevent Duty Referral Panel

Membership

- Registrar / Chief Operating Officer/ Prevent Lead (Chair) *
- Pro Vice-Chancellor Education (PAT Member) *
- Director of Human Resources (for staff referrals) *
- Director of Student Life /University Prevent Coordinator (PAT Member) *
- Head of Campus Life (for student referrals) (PAT Member) *
- CEO of Swansea University Students' Union (for student referrals) (PAT Member) *
- President, Students' Union (for student referrals) *
- Director of The College Swansea
- Administrative Support – Minute Taking

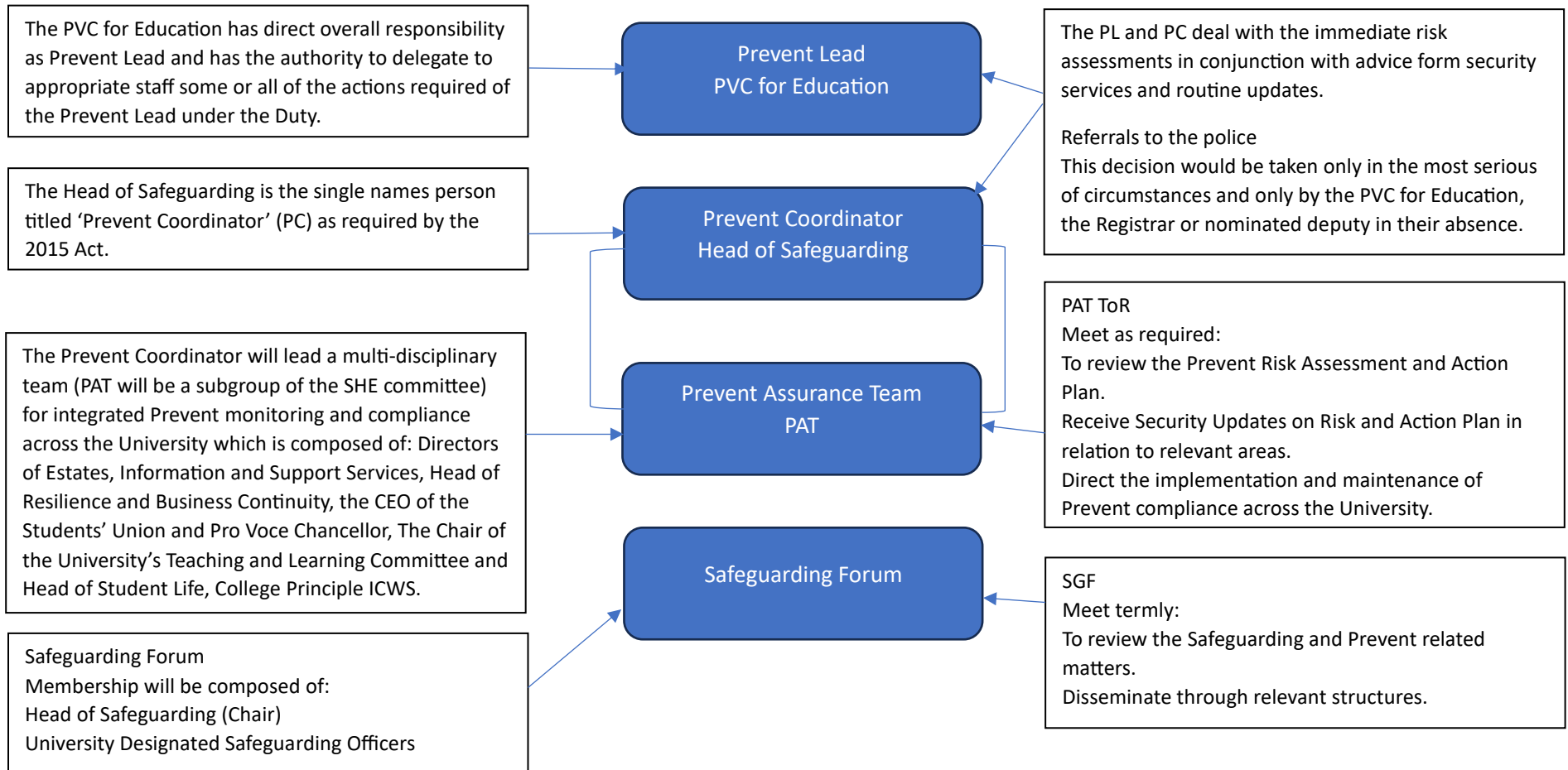
Terms of Reference

- 1.** The Prevent Duty Referral Panel (the Panel) will be convened 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 extremism.
- 2.** The Panel will consist of the relevant individuals (or authorised deputies) mentioned above. The Chair may request other relevant members of staff to attend the meeting, as appropriate, to offer further information and / or advice.
- 3.** The Panel will be convened on a case-by-case basis and will decide 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.
- 4.** Anonymised reports of the Panel's meetings will be provided to the Prevent Assurance Team and Prevent Assurance Group, for monitoring purposes, at subsequent meetings.

Note * Designated Alternate

Appendix 5
PREVENT Safeguarding Structure at Swansea University.

Prevent Duty: Structure and Governance



**Appendix 6
Speaker & Event Booking Protocol**

Speaker and Event Booking Protocol

- Potential Issues:
- 1) Expression of views that may be deemed extremist, discriminatory or inflammatory to others.
 - 2) Adverse media attention
 - 3) Association with campaign or public pressure group



Appendix 7
Swansea University Initial Speaker Enquiry Form

Name: (Include full or other names used)	
Date of Birth:	
Address: (Current or previously known)	
Date of Event:	
Venue of Event:	
Subject Matter of Discussion:	
Reason for Referral:	

