

Prevent Duty Policy

Introduction

1. The [Counter Terrorism and Security Act 2015](#) places a duty on all universities as relevant higher education bodies (RHEB) to have due regard to the need to prevent people from being drawn into terrorism. The University of Law's Prevent Policy has been informed by the [Government's Prevent Duty Guidance for Higher Education Institutions in England and Wales](#). The purpose of this policy is to describe the University's contribution to the multi-agency Prevent agenda and defines the University's process for referral.
2. The University of Law (the University) is committed to:
 - the safety and wellbeing of all members of the University community including the need to safeguard individuals from being drawn into terrorism. This policy should be read in conjunction with the University's [Students of Concern Policy](#) which sets out how the University promotes the safety and wellbeing of all students, to sustain an environment where all can engage in a community of learning. The University has also developed a [Students Under 18 Years of Age Policy](#) and a [Safeguarding Children and Adults at Risk Policy](#);
 - protecting academic freedom and freedom of speech, and has developed [Academic Freedom](#) and [Freedom of Speech and External Speakers](#) policies;
 - equal opportunity for all its students irrespective of age, disability, gender reassignment, marriage and civil partnership, pregnancy and maternity, race, religion or belief, nationality, sex or sexual orientation, and has developed an [Equality, Diversity and Inclusion Policy](#) creating a cohesive and harmonious environment for the benefit of all members of the University community; and
 - taking a risk-based approach in discharging its duties under the [Counter Terrorism and Security Act 2015](#).

Scope of this Policy

3. This policy applies to all staff, students and visitors to the University and applies to all University activities undertaken in the UK. The Prevent Duty does not apply outside of the UK.

Definitions

4. People are defined as staff, students and visitors. For the purposes of this policy:
 - 4.1. a student is defined as anyone who has accepted a place at the University, is currently studying at the University or who has completed their period of study but has outstanding assessments.
 - 4.2. a member of staff is defined as anyone who has accepted an offer of employment, or who is currently employed.
 - 4.3. visitors is taken to mean temporary members of staff, contractors, individuals working in a voluntary capacity with staff or students, and anyone involved in an activity taking place on University premises in their own right or on behalf of an organisation that has been given permission to use University premises.
 - 4.4. Terrorism is defined as the use or threatened use of violence for the purpose of advancing a political, religious, racial, or ideological cause. Terrorism may take the form of extremist behaviour and acts.
5. Extremism is the active or vocal opposition to fundamental British values including democracy, the rule of law, individual liberty and mutual respect and tolerance of different faiths and beliefs and calls for the death of members of the armed forces in this country or overseas.
6. Radicalisation is the process of a person legitimizing support for, or use of, terrorist violence.
7. Channel is a multidisciplinary programme which focuses on providing support at an early stage to people who are identified as being vulnerable to being drawn into terrorism.
8. Campus Dean means the person with primary responsibility for the management of a campus, or their nominee.

Responsibility for this Policy

9. Ultimate responsibility for the development of clear and effective processes and procedures associated with the maintenance of standards and quality assurance of academic provision and overseeing their application lies with the University's Academic Board.

Principles

10. The University will foster an inclusive environment in which the principles of academic freedom and freedom of speech are upheld whilst ensuring that individuals are safeguarded from being radicalised and drawn into terrorism.
11. The University will seek to identify, protect, and support individuals who it believes may be at risk of being drawn into terrorism.
12. The University will discharge this responsibility in partnership with other agencies, including the Police, Local Authorities, and the network of regional Prevent Coordinators.
13. The University operates a risk-based approach and on the basis of its risk assessment identifies any actions which need to be taken to mitigate these risks and develops an appropriate action plan.
14. The University ensures that staff members are provided with appropriate training as outlined the [Prevent Duty Guidance for higher education institutions](#), and makes staff, students, and visitors aware of the importance of referring concerns under the referral process contained in Appendix A.
15. The University's 'Prevent Lead' is the Designated Safeguarding Lead (DSL) whose duties in respect Prevent include:
 - 15.1 Attending external meetings to update on the Prevent agenda;
 - 15.2 Ensuring relevant updates on the Prevent agenda and on threat levels are communicated to the appropriate University staff;
 - 15.3 Ensuring staff are provided with appropriate training;
 - 15.4 Ensuring the University's Board and Executive Team are fully apprised of compliance with the Prevent Duty; and
 - 15.5 Ensuring that relevant policies are compliant with the Prevent Duty Guidance and that any amendments to policy are put forward for consideration following a period of consultation within the University.
16. The Prevent Lead works closely with the University of Law's Students' Union to ensure that the policies the University develops in this area are supported, where appropriate, by the Students' Union.

17. The University provides prayer/quiet reflection space for students and liaises with local faith groups to provide sufficient chaplaincy support for students.

Information Sharing

18. In reaching a decision to share any information with third parties in implementing this policy the University will adhere to its Privacy Policy and the Data Protection principles contained therein.
19. In following the referral process outlined in Appendix A there may be instances where the University is sufficiently concerned by a person's behaviour and the risk, they potentially pose that it will need to share these concerns with external agencies.
20. In sharing such information with external parties, the University will share only sufficient and relevant information in order to allow the concern to be appropriately followed up.
21. The University will keep confidential records of the information shared. These will be kept in accordance with the Data Retention Policy.

Responsibility for the provision

22. Responsibility for the review and oversight of this policy lies with the Designated Safeguarding Lead.

Monitoring and evaluation of the provision

23. Formal responsibility for monitoring and evaluation of this provision lies with the Academic Board.

Version history

Version	Amended by	Revision summary	Date
V1.0	Director Operational Services (Designated Safeguarding Lead/DSL)	Initial draft	25.10.2016
V1.1	Director Operational Services (DSL)	Updated	12.05.2017
V1.2	Director Operational Services (DSL)	Updated	28.09.2018
V1.3	Director of Student Experience, Wellbeing and Inclusion (DSL)	Updated	
V1.4	Director of Student Experience, Wellbeing and Inclusion (DSL)	Review	October 2021
V1.5	Director of Student Experience, Wellbeing and Inclusion (DSL)	Review	January 2024
V1.5	Approved by Academic Board		8 February 2024

Appendix A Referral Process

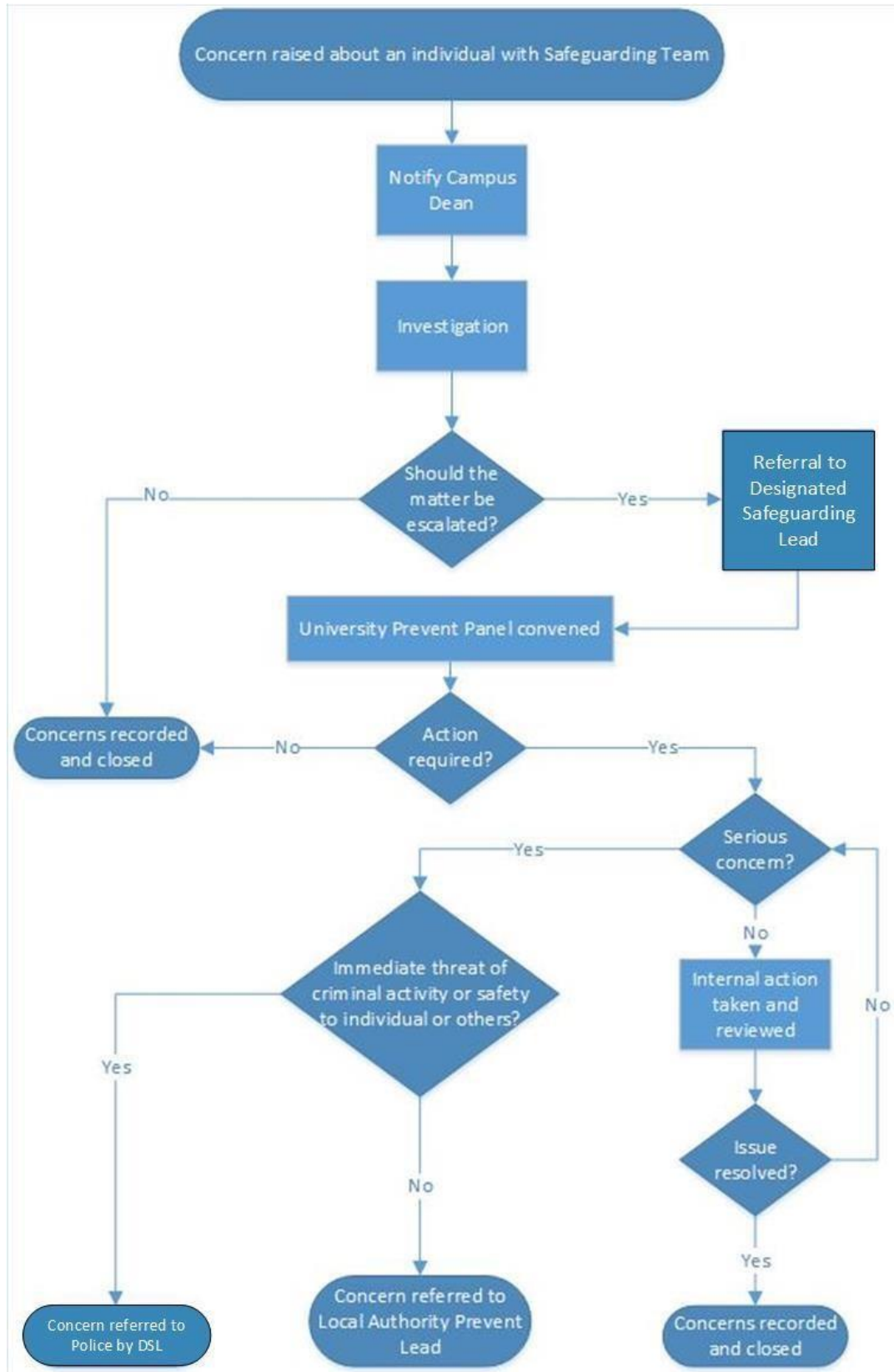
1. Any person may identify concerns about an individual potentially being drawn into violent extremism based on information received or behaviour observed.
 - 1.1. It is important that such concerns can be shared in a safe and supportive fashion to enable concerns to be investigated and an appropriate intervention to be developed, if required.
 - 1.2. It is equally important that assumptions are not made on the basis of 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.
2. Only where there is clear and compelling evidence of a requirement to do so will information be shared with other agencies.
3. Where a person has concerns that an individual is expressing violent extremist views or is at risk of being radicalised, these concerns should be passed to the campus Safeguarding Officer (SO) or Deputy Safeguarding Officer (DSO).
4. The SO or DSO will inform the Campus Dean and the Campus HR Business Partner where the concerns relate to a member of staff. The SO or DSO will investigate the referral, with the assistance of the HR Business Partner where relevant and present a report to the Campus Dean.
5. Where the Campus Dean considers that the matter should be escalated, they will refer the matter to the Designated Safeguarding Lead (DSL).
6. Upon receipt of a referral from a Campus the DSL will convene the University Prevent Panel which will consist of:
 - 6.1. DSL
 - 6.2. Director of Legal Services
 - 6.3. The Campus Dean
7. The University Prevent Panel will make a decision as to the seriousness of the case. Three potential outcomes are likely at this stage:
 - 7.1. No further action under the protocol is required.

7.2. There is substance to the case but at this stage the concerns are not deemed to be serious and internal action only 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 (as per 8.1 to 8.3).

7.3. The panel considers that the concerns are serious and referral to an external agency is appropriate.

8. Where a decision to refer has been taken under 8.3, if there is evidence to suggest that there is an immediate threat of criminal activity, or to the safety of the individual or others, the matter will be referred to the Police. In all other cases the matter will be referred to the Local Authority Prevent Lead by the DSL. The Chief Executive Officer and Data Protection Officer will be notified of the Panel's decision immediately.
9. The University Prevent Panel will also consider whether the case should be considered under any other University Policy irrespective of the decision under paragraph 8. Where a referral is made to an external agency under paragraph 8.3 proceedings under other University Policies may be stayed pending the outcome of the referral.
10. A record of the panel's decision will be kept by the DSL.
11. A flowchart for the process of reporting concerns is included in Appendix B and a referral form is included in Appendix C.

Appendix B



Appendix C Referral Form

Person Subject of Referral	
Date of Referral	
Forename(s)	
Surname	
Date of Birth	
Nationality	
Immigration status	
Gender	
Email address	
Contact numbers	
Address	
Local Authority	
If U18 details of parents or guardian	
Is the Individual aware of the referral?	

Person Referring		
Member of staff making referral		
Contact details	Email	
	Phone Number	
	Address	
Role		

Describe concerns in as much detail as possible

FOR EXAMPLE:

- How / why did the Individual come to your notice?
- Does it involve a specific event? What happened? Is it a combination of factors? Describe them.
- Has the Individual expressed a desire to cause physical harm, or threatened anyone with violence? Who? When?
- Has the Individual expressed extremist views or shown a concerning interest in hate crimes, or extremists, or terrorism, or conspiracy theories? Consider *any* extremist ideology.
- Is there something about the Individual's mobile phone, internet or social media use that is worrying to you? What exactly? How do you have access to this information?
- Is the individual isolated from family or friends? Have they changed peer groups? Do they actively avoid diverse groups of people?

Give details of any factors that you think may be affecting the individual's wellbeing

FOR EXAMPLE:

- Victim of crime, abuse or bullying.
- Disability, mental or physical ill health
- Financial or housing problems.
- Citizenship, asylum or immigration issues.
- Emotional difficulties, relationship problems, family issues.
- Risky behaviours, or alcohol / drug misuse or dependency.
- Expressed feelings of injustice or grievance
- Educational issues

Actions Taken To Date