

## University of Bolton Prevent Policy

### 1. Introduction

#### 1.1 Purpose & Scope

The purpose of this document is to demonstrate the University's clear understanding of its Prevent related responsibilities and to set out good practice within the Institution.

The University is required under the Counter-Terrorism and Security Act 2015 ('Act') to 'have due regard to the need to prevent people from being drawn into terrorism' and adhere to any guidance issued under section 29 of the Act. In guidance, the Government has defined 'extremism' as vocal or active opposition to fundamental British values, including democracy, the rule of law, individual liberty and mutual respect, and tolerance of different faiths and beliefs. It includes in its definition of extremism calls for death of members of armed forces, whether in this country or overseas. The Channel process forms a key part of the Government's Prevent strategy as a multi-agency approach to identify and provide early stage support to individuals who are at risk of being drawn into terrorism - the University, as a specified Partner to the Channel programme, is required to cooperate with the Local Authority to secure effective local cooperation and delivery of Channel in all areas and to build on the good practice already operating in many areas.

The University has implemented its new statutory requirements in a proportionate and risk-based way to ensure it has properly thought through procedures and policies in place which can be appropriately followed and applied. Compliance has been achieved in consultation with its Department of Education FE/HE Regional Prevent Coordinator ('Regional Prevent Coordinator').

This Prevent Policy applies to all staff and students of the University.

### 2. Principles

#### 2.1 Approach

2.1.1 The University takes seriously its responsibility to ensure the safety and wellbeing of students, staff and the wider community and as part of this, it seeks to do all that it can to prevent any member of the University community from being drawn into radicalisation and terrorism. It also recognises that it has a statutory responsibility to protect academic freedom and general freedom of expression. Whilst the University has a duty to have due regard to all members of its community, including its staff and students, its primary focus is on its student community who may be the most vulnerable to being drawn into radicalisation and terrorism.

2.1.2 The University has developed a Prevent action plan to implement the new Prevent Duty 'in a proportionate and risk-based manner' based on the findings of its risk assessment of the institution and its institutional policies regarding the campus and student welfare, which assessed where and how its students might be at risk of being drawn into radicalisation and terrorism. The risk assessment encompassed violent and non-violent extremism, which can create an atmosphere conducive to terrorism and can popularise views which terrorists exploit.

2.1.3 The University recognises that there is no single way of identifying who is likely to be vulnerable to being drawn into terrorism - factors that may have a bearing on someone being vulnerable may include: peer pressure, influence from other people or via the internet, bullying, crime against them or their involvement in crime, anti-social behaviour, family tensions,

race/hate crime, lack of self-esteem or identity and personal or political grievance. The University acknowledges its good practice to date in these areas and has, where practicable to do so, incorporated its new Prevent Duty under the Act as part of its existing institutional policies and procedures to ensure an effective joined-up approach.

2.1.4 The University of Bolton has an established Safeguarding and Prevent Working Group who meet quarterly. The Safeguarding and Prevent Working Group are committed to its responsibility to safeguard and promote the welfare of University of Bolton staff, students and customers and to minimise risk and to work together with other agencies as appropriate to support staff/students/customers who are suffering from, or at risk of harm in order to keep them safe. Membership of this group includes:

- Registrar, (Designated Executive Safeguarding Lead and Prevent Lead)
- Assistant Vice-Chancellor (Transformation and Deputy Designated Executive Safeguarding Lead)
- Director of Student Services and Experience (Safeguarding Officer)
- Deputy Student Services Manager (Deputy Safeguarding Officer and Prevent Coordinator)
- Executive Director of Human Resources
- University Health & Safety Manager
- Students' Union General Manager
- Students' Union President
- Director of Facilities (Operational Prevent Lead)
- Assistant Registrar
- Head of Apprenticeships Development
- HR Business Partner
- Associate Dean - Off-Campus Division
- Director (without portfolio)
- Group Director of Apprenticeships
- Assistant Vice Chancellor (Academic Operations)
- Student Services Team Leader (Senior Designated Safeguarding Champion)

## **2.2. Leadership**

2.2.1 The University's approach is supported by the Governing Body, the Vice Chancellor and the Executive Board. This policy has been approved by the Governing Body and thereafter an annual assurance report is presented to the Governing Body.

2.2.2 The Registrar is identified as the Executive Prevent Lead responsible for ensuring that the University complies appropriately with the new Prevent Duty, in liaison with the Regional Prevent Coordinator and other key stakeholders within and beyond the University. The Director of Facilities is identified as the Operational Prevent Lead. The Deputy Student Services Manager who is also the Deputy Safeguarding Officer is identified as the Prevent Coordinator.

## **2.3 Risk Assessment and Action Plan**

The University's Prevent risk assessment and action plan will be monitored biannually and reported on annually to the Governing Body. Where any significant risk is identified the University will consider what action might mitigate the impact/ likelihood of that risk evolving and, where necessary, include it in its Prevent action plan.

## **2.4 External Speakers**

2.4.1 The University's Code of Practice relating to Freedom of Speech and meetings on University Campus: <https://www.bolton.ac.uk/governance/documents-and-reports/> reflects the new Prevent Duty; it sets out how the University will manage events on campus and use all its premises whilst ensuring that it meets the different legal requirements on it, not least the duties under the Human Rights Act (Article 10), the Education (No. 2) Act 1986 and the Education Reform Act 1988 to secure freedom of speech and academic freedom within the law. The University also has an equivalent Code of Practice relating to Freedom of Speech and all planned, affiliated, funded or branded events taking place off campus.

2.4.2 The University recognises that to encourage terrorism and/or invite support from a proscribed terrorist organisation are both criminal offences and shall not provide a platform for these offences to be committed. The University will not host a particular speaker where the views being expressed, or likely to be expressed, constitute extremist views that risk drawing people into terrorism or are shared by terrorist groups. In such a circumstance, the event will not proceed except where the University is entirely convinced that such risk can be fully mitigated without cancellation of the event. Where the University is in any doubt that the risk cannot be fully mitigated it will exercise caution and not allow the event to proceed.

2.4.3 The University acknowledges that at law gender segregation is not permitted in academic meetings or at events, lectures or meetings provided for students, or at events attended by members of the public or employees of the University or the Students' Union, save gender segregation is permissible during collective religious worship because it is not subject to equality law - in light of this, the University will permit voluntary gender segregation for collective religious worship purposes only. An external speaker is therefore not permitted to insist on gender segregation as a condition of participation in University events as gender segregation would be unlawful in those circumstances.

2.4.4 In conjunction with the University's Code of Practice, the Students' Union has its own complementary procedure in place in relation to events organised by its societies where external speakers will be participating.

## **2.5 Staff Training**

The University recognises the importance of ensuring appropriate Prevent awareness staff training is provided to assure a consistent cross institutional understanding of:

- the new Prevent Duty that may help staff recognise those students who are vulnerable of being drawn into terrorism and potential signs of radicalisation; and
- what action to take in response, when to make referrals to the Channel programme and where to get additional advice and support.

The University is committed to providing appropriate Prevent awareness training at all levels in liaison with its Regional Prevent Coordinator and its training arrangements shall be reviewed annually.

## **2.6 Welfare and Pastoral Care/Chaplaincy Support**

2.6.1 Pastoral care is available to the University's students in a variety of ways with specialist

support being available through Student Services. All students have a personal tutor and have access to University members of staff that provide pastoral support. The Students' Union provides welfare support to all students.

2.6.2 The University will ensure that, for all students, provision is made for those of any faith (or those without faith) to access appropriate facilities for pastoral care and for religious purposes. There are clear and widely available policies for the management and use of the prayer rooms and other faith-related facilities (which are overseen by the Coordinating Chaplain of the Multi-Faith Chaplaincy based within the University) and any issues arising from their use.

## **2.7 IT Policies**

2.7.1 The University considers it unacceptable for its IT networks to be used in any way that supports, promotes or facilitates radicalisation and terrorism; it has specifically referenced its new statutory Prevent Duty in its relevant IT policies and will keep under regular review the possible use of filters as a means of restricting access to harmful content as part of its risk assessment process.

2.7.2 To enable the University to identify and address issues where online materials are accessed for non-research purposes, it has clear policies and procedures for students and staff working on sensitive and extremism-related research.

## **2.8 Students' Union**

The Students' Union, in collaboration with the University, is required to ensure that it provides excellent support to our students and co-operates with the Institution's policies. Through regular contact with the Students' Union the University will ensure that students are consulted on an on-going basis on how it complies with its obligations under the new Prevent Duty and that Students' Union staff have had Prevent awareness training. The Students Union President and General Manager are both members of the University of Bolton Safeguarding and Prevent Working Group.

## **2.9 Information Sharing**

The University endorses the active engagement of its senior management with other Partners, including the Police and its Regional Prevent Coordinator, and will maintain a single point of contact for operational delivery of Prevent related activity. The University acknowledges the importance of the Channel programme and the opportunities for informal and formal sharing of information with relevant authorities. Information sharing will only take place with external authorities when this is consistent with the provisions of the Data Protection Act.

## **2.10 Communications**

The University will not permit material supporting terrorism to be displayed within University premises and will remove any such material if it is found. Likewise, it will seek to ensure that the University's printed and electronic communications (including its website) do not contain or support terrorist material or material likely to encourage terrorism and will investigate immediately if any such instances are raised.

## **3. Roles and Responsibilities**

All members of staff should be aware of the University's responsibilities under the Prevent

Duty and of the measures set out above to comply with it. Members of the University community who are concerned about a student who might be at risk of being drawn into radicalisation and terrorism should report this to one of the following:

- their line manager;
- Director of Student Services and Experience who is also the University Safeguarding Officer;
- Deputy Student Services Manager who is also the Prevent Coordinator and Deputy Safeguarding Officer.

#### **4. Related Policies and Procedures**

The following policies and procedures are related to the Prevent Policy which include, without limitation, the following:

- Code of Practice relating to Freedom of Speech and meetings on University Campus
- Code of Practice relating to Freedom of Speech and all Planned, Affiliated, Funded or Branded Events taking place Off Campus
- Internet Security Policy
- Acceptable Use Policy for Students
- Acceptable Use Policy for Staff
- Research Ethics Framework Policy
- Data Protection Policy
- Processing Your Personal Data
- Student Social Media Guidance
- Chaplaincy Policies, Guidance and Procedures
- Health and Safety Policy
- Dignity at Study Policy (The University Policy on Harassment, Bullying, Discrimination and Victimisation)

#### **5. Equality Impact Assessment**

The University of Bolton is committed to the promotion of equality, diversity and a supportive environment for all members of our community. Our commitment to equality and diversity means that this Policy has been screened in relation to the use of plain English, the promotion of the positive duty in relation to the protected characteristics of race, sex, disability, age, sexual orientation, religion or belief, gender reassignment, marriage and civil partnership, pregnancy and maternity.

<b>Prevent Policy</b>	
Procedure Ref	
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Version Date	Approval Date
Name of Developer/Reviewer	Specialist Services & Safety Manager (Developer 2016) now the Health and Safety Manager Prevent Coordinator (Reviewer since 2021)
Procedure Owner (School/Centre/Unit)	VC Office
Person responsible for implementation (post holder)	Registrar and Chief Operating Officer
Approving Committee/Board	Board of Governors
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