



PRIFYSGOL
BANGOR
UNIVERSITY

Prevent Policy

Date	Purpose of Issue / Description of Change	Equality Impact Assessment Completed
1 st February 2016	Initial approval	11 th February 2016
30 th January, 2017	Review and approval	
August 2017 and September 2018	Minor amendments	
28 th January 2019	Review and re-approval	
1st June 2020	Review (relating to Covid-19 pandemic) and re-approval	
1 st June 2023	Review and re-approval. Change of titles, update of relevant acts and referral to authorities and clarification that students can be external speakers.	EIA not unduly affected.

Policy Officer	Senior Responsible Officer	Approved By	Date
Senior Student Safeguarding, Conduct and Complaints Officer	Academic Registrar	Compliance Committee	16th January 2024

This Policy will be reviewed in 3 years

Prevent Policy

Bangor University aims to provide an environment which respects and values the positive contribution of all its members so enabling them to achieve their full potential and to gain benefit and enjoyment from their involvement in the life of the University. These values are also enshrined in the University's Strategic Plan.

To achieve the aim the University acknowledges the following basic rights for all its members and prospective members:

- To be treated with dignity and respect
- To be treated fairly
- To receive encouragement to reach their full potential

1. Introduction

[a] The Counter-Terrorism and Security Act 2015 / The Prevent Duty

The Prevent Duty is part of the overall counter-terrorism strategy known as CONTEST¹. The aim of the Prevent Duty is to reduce the threat to the UK from terrorism by preventing people becoming terrorists or supporting terrorist activity.

The Counter-Terrorism and Security Act 2015 ("the Act") enshrined the requirement outlined above as the need to "prevent people from being drawn into terrorism". The Act places a duty on specified authorities (including Universities) to have "due regard to the need to prevent people from being drawn into terrorism."

[b] Context

This Policy outlines Bangor University's approach to ensuring compliance with the requirements of the Act and the Prevent Duty, its approach to dealing with concerns raised within its community, and its contribution to any multi-agency response to concerns raised.

2. Scope

This Policy applies to all individuals who come into contact with Bangor University, including but not limited to Bangor University students, staff, external speakers² (on campus, at university branded events off campus, and at university branded events held online), honorary positions and directors, as well as all Bangor Students' Union clubs, societies, course representatives, volunteers, sabbatical officers and Council Members.

¹ Contest 3.0 June 2018 <https://www.gov.uk/government/publications/counter-terrorism-strategy-contest-2018>

² 'External Speaker' includes any Bangor University staff member or student speaking on behalf of an external group, and/or anyone invited to deliver a lecture, speech or to take part in a panel discussion. It also includes the recording or audio-visual streaming of a speaker, or the showing of a film that is designed to promote a particular point of view.

3. Approach

As part of its responsibilities Bangor University will carry out a risk assessment which is proportionate to the size, complexity and cultural setting of the institution. The risk assessment will ensure that appropriate policies and procedures are in place to help identify and support individuals who may be vulnerable and also to provide clear management oversight of the requirements. The risk assessment will be regularly reviewed and, where necessary, updated.

[a] Identification and Support

Bangor University seeks to identify vulnerable individuals within its community at an early stage, be they a member of staff or a student, and ensure they are given appropriate support and welfare provisions. The University's responsibilities under the Act will be managed initially through existing safeguarding arrangements set out within this Policy, and also within the University's *Safeguarding Policy*, and as outlined in the flowchart in Appendix 1 to this Policy.

[b] Referral

Any member of staff, or student may identify concerns about other members of staff or students who are vulnerable to the risk of being drawn into violent extremism, based on information they have received or behaviour they or another individual have observed.

The University believes that it is important for those concerns to be shared in a safe and supportive environment, where appropriate intervention can be offered, if required.

There are many ways in which a member of staff or student can refer concerns that they have regarding an individual. It is suggested that, unless there is a direct threat (to life or of harm) concerns should, initially, be directed towards appropriate internal safeguarding and welfare provisions either within Human Resources (staff) or Student Support and Wellbeing Services (students).

Where existing safeguarding and welfare provisions have been offered, and/or a concern remains regarding an individual, or where the concern is so great as to warrant immediate external referral the following procedure will apply:-

- i. The concern should be raised initially with an appropriate member of staff within the individual's School or Department e.g. Head of School, line manager, senior tutor etc. who should discuss the issue with the individual reporting the concern. The member of staff receiving the concern will, in turn, inform the University Prevent Coordinator³ or in their absence their Deputy⁴.

The University Prevent Coordinator will discuss the concern with the reporting member of staff and will then convene the Referral Panel as outlined in Appendix 1 below. There may be occasions where the University Prevent Coordinator determines that sufficient

³ Senior Student Safeguarding, Conduct and Complaints Officer

⁴ Student Safeguarding, Conduct and Complaints Administrator

concern or risk exists and may make an immediate referral to the Channel Process without convening a referral panel.

- ii. The Referral Panel when convened will consider all available options and will come to a decision as to whether the individual is referred to the Channel Process (facilitated by North Wales Police / Counter Terrorism Policing and the relevant Local Authority) or is referred for further institutional safeguarding / welfare support.
- iii. The University Prevent Coordinator will make the referral to the appropriate statutory agency.
- iv. The University Prevent Coordinator will represent the University at multi-agency meetings / Channel Panel meetings, in whatever format that may be held, either in person or virtually, in relation to the referral.
- v. Out of Hours referral: a concern which needs to be raised out of normal office hours should be raised in the first instance with the University's security section who are available 24 hours a day 365 days a year on (01248) 382795. The security section should then raise the concern with the University's Prevent Coordinator.

If there is an immediate concern of danger to life or harm the correct referral process is to call 999 and then inform the University Prevent Coordinator at the earliest opportunity.

4. Information Sharing

In following the procedure outlined in Section 3[b] above, and also in Appendix 1 there may be instances where the University is suitably concerned for a person's welfare to share these concerns with external agencies. This may include referral to the *Channel* process, and / or referral to North Wales Police (under the terms of its Information Sharing Agreement).

In reaching a decision to share any information with third parties (as per Section 3[b] above) the University will adhere to its Data Protection Policy, the requirements of the General Data Protection Regulations (GDPR), the Data Protection Act 2018, and the principles contained therein. Confidential records of the information shared will be kept by the University's Prevent Coordinator within the Legal and Compliance Office, in accordance with the requirements of the Data Protection Act 2018.

Requests from the Police / security services regarding individuals at Bangor University are handled by the Student Conduct, Complaints and Appeals Administrator in accordance with current legislative requirements and the policies of the University.

In all cases necessity, proportionality, risk and wherever possible the consent of the individual will be key to determining whether information will be shared.

5. Training

The University will ensure that appropriate training and awareness is offered to staff at all levels of the University. Training will be offered both face to face and via the university's e-learning module which is available to all staff on *Blackboard*. In particular it is suggested that members of staff within the following services will require Prevent duty awareness training:-

- Legal and Compliance Services;
- Human Resources;
- The International Education Centre;
- Student Services, and in particular mental health advisors and counsellors;
- Property and Campus Services, and in particular the security section;
- Commercial Services (and in particular senior and student wardens, conferencing and room bookings)
- Senior Tutors and personal tutors;
- Academic college and school administrators.

All other members of staff both within professional services and academic schools should also be encouraged to attend training, and line managers are responsible for making sure all their staff are aware of the Prevent Duty and the referral mechanism for raising concerns. Staff should also be encouraged to undertake training every three years in order to ensure that they keep up to date with current information. A note of staff's attendance on Prevent training will be kept in the *Agresso* system.

6. Security Sensitive Research Material

Following the publication of the UUK document "Oversight of Security Sensitive Research Material" (UUK 2012) the University has established a *Procedure for Approval and Registration of Sensitive Research Projects*⁵ for capturing and holding details of research which is either [a] security sensitive or [b] has the potential to compromise the reputation of the University.

Update of the guidance in 2019 also highlights;

Section 58 of the Terrorism Act 2000 makes it an offence if a person 'collects or makes a record of information of a kind likely to be useful to a person committing or preparing an act of terrorism.' A modification by the Counter-Terrorism and Border Security Act 2019 also introduced the offence of viewing or otherwise accessing via the internet documents or records containing information likely to be useful to a person committing or preparing an act of terrorism. There is a defence if the information is used for academic research purposes.

Sections 2 and 3 of the Terrorism Act 2006 outlaw the dissemination of terrorist publications, including by electronic means, and give a very wide definition of 'terrorist publication' and 'statements' that could be construed as encouraging or inducing the commission, preparation or instigation of acts of terrorism. Section 2 of the Terrorism Act 2006 has been amended by sections 5(6) and 5(7) of the Counter-Terrorism and Border Security Act 2019. Academic research is not a defence under the Terrorism Act 2006.

⁵ Available on the University website

Section 26(1) of the Counter-Terrorism and Security Act 2015 imposes a duty on 'specified authorities', when exercising their functions, to have due regard to prevent people from being drawn into terrorism. This is also known as Prevent.

This process is overseen by the University Ethics Committee and managed on a day to day basis by the Senior Research Governance and Policy Officer.

7. Links with other Policies and Procedures

This policy is closely linked to other University Policy and Procedures. In particular:

- The *Code of Practice on Freedom of Speech* which includes a process for approving external speakers. The Compliance Committee will manage the requirements of the Code of Practice and the Academic Registrar will oversee the management of the University's faith rooms.
- The *Acceptable Use Regulations* which includes reference to the requirements of the Counter-Terrorism and Security Act 2015.
- The *Safeguarding Policy* which outlines the University's procedures when dealing with safeguarding issues.

8. Complaints

The Academic Registrar (or nominee) will coordinate any complaints received in respect of this policy.

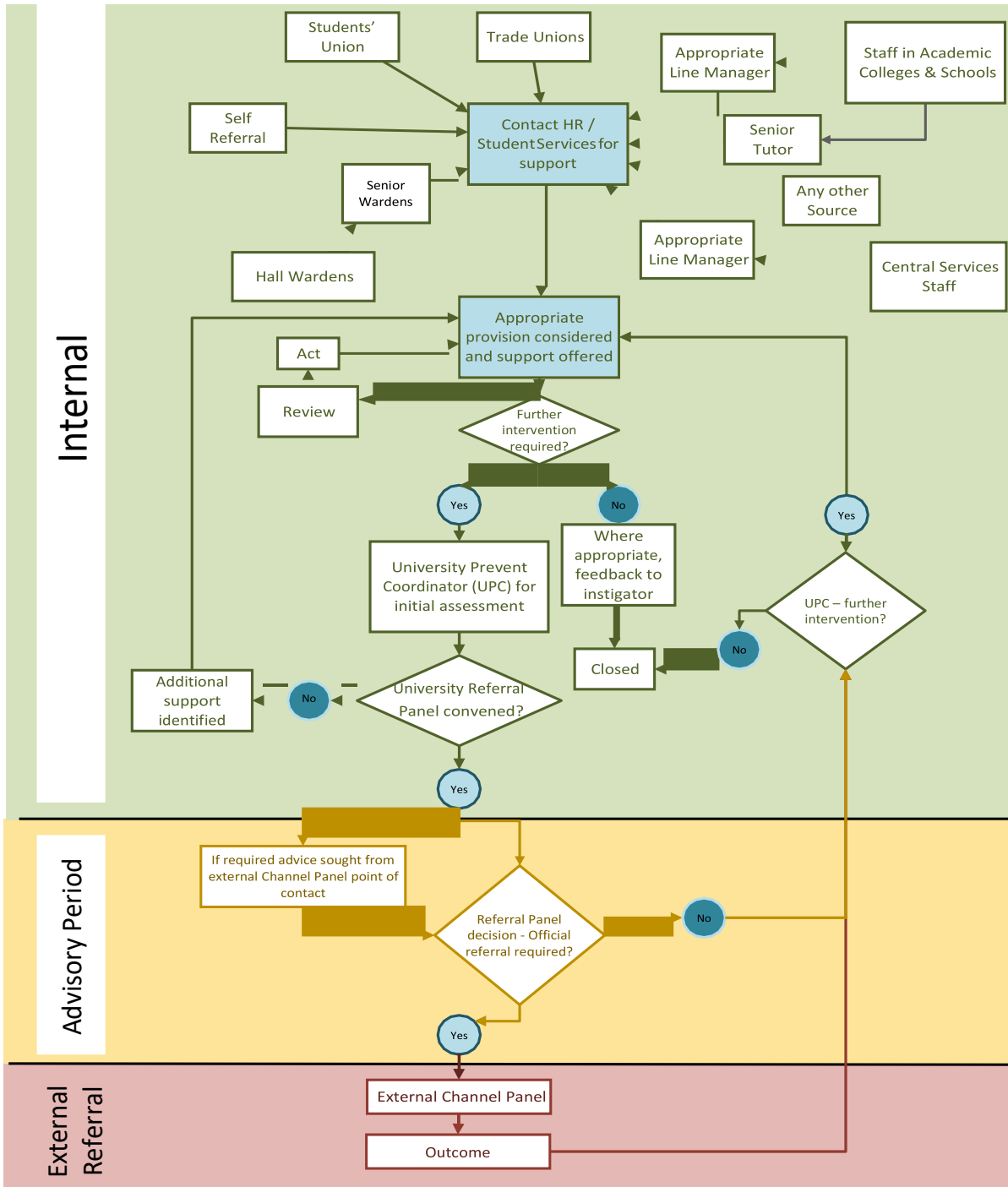
- The complaint should be provided in writing to complaints@bangor.ac.uk. The complaint will be acknowledged within 5 working days and every effort will be made to offer a more comprehensive reply within 10 working days.
- If the complainant is not satisfied with the reply then they may escalate their complaint. They should contact complaints@bangor.ac.uk within 15 working days, explaining the reasons for remaining dissatisfied. The complaint will then be dealt with in accordance with the University's complaints procedures as appropriate.

For Prevent compliance-related complaints only, if complainants are dissatisfied with the outcome of the Complaints Procedure, they may contact the Higher Education Funding Council for Wales (HEFCW) who have been delegated responsibility by the Home Secretary to monitor compliance of the Prevent duty for relevant higher education providers in Wales:

Higher Education Funding Council for Wales
Tŷ Afon
Bedwas Road
Bedwas
Caerphilly
CF83 8WT
Tel: 029 2085 9696

Web: www.hefcw.ac.uk
Email: complaints@hefcw.ac.uk

Information Sharing Procedure: Vulnerable Student or Member of Staff



Appendix 2

Bangor University Prevent Duty Referral Panel

Core Membership

Chair - Academic Registrar (or nominee)
Director of Human Resources
Deputy Vice-Chancellor
University Prevent Coordinator or Deputy

In addition, one or more of the following should be invited

Student Referral

Director, Students' Union
President, Students' Union
University Secretary

Staff Referral

Deputy Director Human Resources (Operations)
University Secretary

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 violent extremism.
2. 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.
3. 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.
4. Anonymised reports of the Panel's meetings will be provided to the Compliance Task Group, for monitoring purposes, at its next meeting.
5. 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.