CARDIFF UNIVERSITY PREVENT POLICY

Introduction

There is a statutory imperative that we set out the measures we will take in accordance with provisions in the Counter-Terrorism Act 2015[1] as they apply to higher education providers. We have set out separately to this document the University policy with regard to Equality and Diversity, including Religion and Belief, and Freedom of Speech[2]; these policies compliment this strategy and the related action plan.

Encouragement of terrorism and/or soliciting support for a proscribed organisation is a criminal offence. We set out here 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 with regard to harassment or radicalisation from any source, and relevant measures which enable our students to learn in safe and intellectually stimulating environments.

In accordance with the statutory guidance for higher education providers we have also set out a risk register and action plan which will be reviewed regularly and is subject to monitoring and enforcement as set out in the Act. This policy relates to all staff, students, visitors to University buildings and those engaged in business on behalf of the University.

Partnership Working

The University places a priority on working with partners to ensure we provide a safe environment. We were a founding member of the South Wales Prevent Board and remain committed to representation and active membership of this Board. We recognise that issues around radicalisation do not respect institutional boundaries and, 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.

In responding to an individual case related to the prevention of radicalisation we set out in this policy how we will seek to include a range of partners in our decision making and consequent actions we may take. Through the collective knowledge, expertise and experience available from the Partnership Board we seek to share practice and learning from such cases across the region and beyond.

External Speakers and Events

Existing procedures for the management of external speakers and events are outlined in the University's Code of Practice to Ensure Freedom of Speech as required under The Education (2) Act 1986[3].

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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
[2] See the University's Equality and Diversity Policy Version 2 (2011):
http://www.cardiff.ac.uk/public-information/equality-and-diversity
[3] See the University's Code of Practice to Ensure Freedom of Speech
http://www.cf.ac.uk/govrn/cocom/freedom/index.html

All external speakers should be risk assessed against a set of criteria which enables freedom of speech and protects 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.

The room external speaker booking system manages the process in cases where a room is booked for an event. The University should be notified by any member of the University community through the published room booking system of their intention to invite a speaker to attend. This should take place at the earliest opportunity and no less than 21 days in advance, before any travel or other costs are incurred. We have adopted a risk assessment process for external speakers.

In other cases, such as where an external speaker may be invited as part of an academic programme or conference, it is the responsibility of the Head of School to ensure that a risk assessment is undertaken and where risks are identified to refer the proposed speaker to the Prevent Group so that appropriate and proportionate control measures can be identified. This risk assessment should follow the format outlined here.

There are three levels of risk assessment for speakers: Green represents no risk; amber, potential risk with assessment required; red, high or material risk. Where a speaker is assessed as green there will be no action and the speaker will be immediately permitted to attend. Where a speaker is assessed as amber the University Prevent Group will be convened and will seek expert guidance in reaching a decision and to identify appropriate and proportionate control measures to mitigate the identified risks. Where evidence presented suggests a speaker is assessed as red the University Prevent Group will verify the position based on evidence and will confirm that the speaker is not able to attend the University. It will be our intention to place a decision on record within five working days of a speaker request.

Where a speaker is refused access to the University or to our students for any reason as a result of the processes set out here we will not be held liable for any costs incurred. We would typically consult statutory bodies, including the security services, in regard to a prospective speaker seeking to attend the University identified at either the amber or red level of risk. This approach will also apply where a speaker directly solicits the opportunity to access our students off campus. This is in accordance with statutory guidance.

Risk Assessment and Response

The University recognises the risk that members of our community may be targets for radicalisation and we will take appropriate measures to minimise this risk, working in partnership with relevant agencies through appropriate processes, such as Channel[4]. Where a specific risk is identified the University Prevent Group will assess that risk and advise on action accordingly. This group shall normally be comprised of: The Academic Registrar, Director of Student Support, the Head of Security, a representative of the Students' Union, a University Chaplain and any other such experts as the Chair decides.

Identification, Support and Referral

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

We 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[5].

Any member of staff, or student may identify concerns about a member of the University community who appears vulnerable to the risk of being drawn into violent extremism, based on information received or behaviour reported or directly observed. It is important that our response is enabled by a safe and supportive environment. Where appropriate intervention may be offered if appropriate. Unless there is a direct threat of physical harm to an individual concerns should initially be directed towards appropriate internal safeguarding provisions; in Student Support where the matter concerns a student, and Human Resources where it concerns a member of staff.

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 with whom the issue is raised should discuss that issue with the individual reporting the concern. The member of staff receiving the concern will, in turn, inform the internal University Prevent Coordinator.

ii.   The University Prevent Co-ordinator may consult with statutory authorities outside the University to better understand relative risks.

iii.   A panel may at this stage 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 process.

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.

Student Services and Chaplaincy

We have in place a range of professional student support services and every student has a personal tutor as part of the University commitments set out in our Student Charter[6].

Our student services work in partnership with our multi-faith Chaplains and provide the professional 'home' for chaplaincy in the University. We seek to offer an appropriate multi-faith approach, and work with a range of faith groups who are required to operate in compliance with our Equality and Diversity Policy.

Where a student is identified as being at risk in any way, including someone who has been drawn into expressing views that relate to harming themselves or others, are contradictory to the University's Equality and Diversity Policy, or constitute harassment, actions are taken to ensure that individual can access support. We may also take action against the student in accordance with the University Student Disciplinary or Fitness to Practice Procedures. Where appropriate this may

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[5] https://www.cardiff.ac.uk/__data/assets/pdf_file/0019/473212/2016-Jun-Interim-Safeguarding-Policy-v1.pdf
[6] See the Cardiff University Student Charter:
http://www.cardiff.ac.uk/for/current/student-charter/

include external referrals or consultation in accordance with our published policies on data protection and confidentiality.

Space for prayer and reflection

The University is a secular organisation which seeks to ensure an inclusive approach to students and staff of all faiths and none. There are rooms available across the University that provide space for prayer and reflection. They vary in the number of hours that they are available each day. These rooms are operated in accordance with our Religion and Belief Policy.

Cardiff University Students' Union and Student Societies

Cardiff University Students' Union and its affiliated societies abide by their own published polices in accordance with UK laws that apply to registered charities[7]. The University works in close partnership with the Students' Union both formally and informally on day to day matters as part our shared commitment to deliver a safe and intellectually invigorating learning environment and excellent student experience.

Information Technology

The University has in place a University IT Acceptable Use Policy which applies to all use of all IT facilities[8]. 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.

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

The University has a well-established system of School Research Ethics committees for reviewing research which involves human participants, human material or human data, including such research that is extremism related.

The University's Research Integrity and Governance Code of Practice 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.

Staff training

We make staff training from our Partnership Board colleagues available to appropriate University staff. We prioritise staff most likely to require awareness of the Prevent agenda (e.g. security

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[7] See the Cardiff University Students' Union Policy Book
http://www.cardiffstudents.com/about-cusu/governance/policy/
[8] See the University Acceptable Use Policy 2015
http://www.cardiff.ac.uk/govrn/cocom/uniitregs/

services management, student support professionals, students' union staff, chaplains) and will monitor and continue to refresh this on an annual basis.

Where appropriate the University's HR team may also be consulted to identify staff requiring an awareness of the Prevent agenda. Engagement with any relevant training shall be recorded through the University performance review process.

Data sharing

In partnership with the South Wales Prevent Board the University has a formal data sharing agreements as appropriate in order to discharge its duties under the Act. Any data sharing will be in line with the requirements of the Data Protection Act 1998[9]. Clear procedures relating to a formal data sharing agreement are disseminated to staff as appropriate.

ENDS

REVIEW:

Internal Audit	July 2016
University Prevent Group	January 2017
University Prevent Group	October 2017
Governance Committee	November 2017
University Council	December 2017

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[9] Data Protection Act 1998
http://www.legislation.gov.uk/ukpga/1998/29/contents