

## University of Bolton Prevent Policy

### 1. Introduction, purpose and scope

This purpose of this document is to demonstrate the University's clear understanding of its Prevent related responsibilities and set out its 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 and within the Prevent Duty Guidance for Specified Authorities in England and Wales 2015, revised and updated in April 2021.

The Government definition of Extremism until the 14 March 2024 was 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 included in its definition of extremism calls for death of members of armed forces, whether in this country or overseas.

From the 14 March 2024 the government definition of extremism changed to: Extremism is the promotion or advancement of an ideology based on violence, hatred or intolerance, that aims to:

1. negate or destroy the fundamental rights and freedoms of others; or
2. undermine, overturn or replace the UK's system of liberal parliamentary democracy and democratic rights; or
3. intentionally create a permissive environment for others to achieve the results in (1) or (2).

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 implemented its statutory requirements in 2016 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 was achieved in consultation with the Department for Business, Innovation and Skills Regional Prevent Coordinator now the Department of Education DfE Regional Prevent Coordinator. The University continues to work closely with the Department of Education and other external safeguarding partners to ensure compliance with the duty.

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 freedom of speech. 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 susceptible/vulnerable to being drawn into radicalisation and terrorism.

2.1.2 The University 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.

In 2023 the University took the strategic decision to embed the Prevent Risk Assessment and Action Plan within a new Safeguarding and Prevent Risk Assessment and Action Plan that was approved by the Board of Governors in November 2023.

2.1.3 The University recognises that there is no single way of identifying who is likely to be susceptible or vulnerable to being drawn into terrorism, factors that may have a bearing on someone being susceptible or vulnerable may include (non-exhaustive list):

- being disabled or needing care, support or protection because of age or disabilities
- peer pressure and influence from other people or via the internet
- bullying
- crime against them or their involvement in crime
- antisocial behaviour
- family tensions
- race/hate crime
- lack of self-esteem or identity
- personal or political grievance.

## 2.2. Leadership

2.2.1 The University's approach is supported by the Governing Body, the Vice Chancellor and the Executive Senior Management. This policy has been approved by the Governing Body and thereafter an annual Safeguarding and Prevent assurance report will be 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 Co-ordinator and other key stakeholders within and beyond the University. The Director of Facilities is identified as the Operational Prevent Lead. The Head of Student Services is one of two Safeguarding Officers and the Prevent Coordinator.

## 2.3 Risk Assessment and Action Plan

The University's Safeguarding and Prevent risk assessment and action plan will be monitored 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 Safeguarding and 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 Premises: 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, the Education Reform Act 1988 and the Higher Education (Freedom of Speech) Act 2023 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 and Student Training

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

- the 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, to a safeguarding concern including one of a Prevent nature, how to and who to report a concern too.

The University is committed to providing appropriate Prevent awareness training at all levels in liaison with external Safeguarding and Prevent related partners including but not limited to the Regional Prevent Coordinator. HR has formal responsibility for sourcing, coordinating, monitoring engagement with Safeguarding and Prevent Training for staff. Staff training will be reviewed every 12 months.

All students have access to Prevent, Safeguarding and British Values training via LEAP Online.

Safeguarding, Prevent and British Values are key themes discussed with apprentices at their quarterly review meetings, apprentices can also discuss such topics with their employers or Work Based Trainers.

In addition, apprentices will be provided with information on Safeguarding, Prevent, Bullying, Harassment, Victimisation and Sexual Misconduct at their induction.

The Acting Head of Apprenticeships has responsibility for informing Employers of safeguarding arrangements at the University of Bolton. The University will work with Employers accepting University students as apprentices in relation to training and to ensure appropriate safeguarding measures are in place.

## 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 including the Life Lounge, Student Mental Health and Wellbeing services. All students have a Personal Academic Tutor and have access to University members of staff that provide pastoral support. Apprenticeship students also have access to a Work Based Trainer who delivers learning support to academic staff, apprentices and their employers. 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 Co-ordinating 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 statutory Prevent Duties 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 cooperates 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 Prevent Duty and that Students Union staff have had both Safeguarding and Prevent awareness training. The Students' Union General Manager is an active member 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 Co-ordinator, 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 their line manager or to one of the two Safeguarding Officers, more information on reporting a concern is available in the University Safeguarding Policy and Procedure.

### 4. Related Policies and Procedures

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

- Safeguarding Policy and Procedure
- 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
- Code of Practice for Ethical Standards in Research
- Data Protection Policy
- Processing Your Personal Data
- Social Media Guidance — Think Before You Write
- Social Media Policy
- Chaplaincy Policies, Guidance and Procedures
- Health and Safety Policy
- Dignity at Study Policy (The University Policy on Harassment, Bullying, Discrimination, Victimisation and Sexual Misconduct)

### 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>	
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