Prevent Duty Policy and Procedures

STAFFORDSHIRE
UNIVERSITY

1. Introduction

1.1   The Counter-terrorism and Security Act 2015 places the University under a duty to have 'due regard to the need to prevent people from being drawn into terrorism'. This is known as the '[Prevent Duty](#)'.

1.2   The University seeks to provide a safe, supportive and inclusive environment for learning, teaching, research and scholarship. As a result, the University will seek to ensure that all individuals within its community are safeguarded from being drawn into terrorism. It is recognised that terrorism can be associated with a wide range of ideologies and may thrive in permissive environments (section 173, p40, Prevent Duty Guidance, 2024).

1.3   The University has adopted a risk-based approach to put in place appropriate measures to fulfil its duty under the Counterterrorism and Security Act 2015. However, at the same time, it must be noted that the University is required to fulfil its other legal duties, such as ensuring freedom of speech and promoting equality and diversity across the University.

1.4   This policy and associated procedures apply to all members of staff employed by Staffordshire University and Staffordshire University Services Limited and students at the University, Staffordshire University Woodlands Nursery and Forest School. They seek to help staff and students to understand the University's responsibilities in relation to its Prevent Duty, to guide staff and students who have grounds to believe that a student or member of staff is susceptible to being drawn into terrorism and the appropriate referral processes if concerns exist. All Educational Partners are expected to have their own organisational Prevent Duty policy as part of their contractual obligations with the University.

2. Definitions

2.1   The statutory definition of 'terrorism' should be applied where that term is used in this policy and associated procedures. The Terrorism Act 2000 defines terrorism as "the use or threat of action which involves serious damage to property; or endangers a person's life; or creates a serious risk to the health and safety of the public or a section of the public; or is designed seriously to interfere with or disrupt an electronic system. The use of threat must be designed to influence the government or to intimidate the public and is made for the purpose of advancing a political, religious, racial or ideological cause."

The government published an updated definition of Extremism in 2024 which defines it as

'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).'

Where the term extremism is used within this policy and procedures, it should be recognised in the context of this definition. Further context can be found in the guidance.

3. Local Context

3.1   Staffordshire University operates campuses in Stoke-On-Trent, Stafford, Lichfield and London. Our students and apprentices study courses at undergraduate and postgraduate (taught and research) levels and in part-time, full-time and distance learning modes. The University also has a network of educational partner institutions across the United Kingdom including further education colleges and private providers. Our partners delivering programmes, who are FE Colleges are monitored by Ofsted for prevent duty compliance. Both FE College partners and private providers are asked to provide to provide the University with evidence of their relevant policies and procedures to give assurance of their discharge of their Prevent duty and the safeguarding of university students studying with partners. These assurances are overseen and monitored by the University Prevent, Contest and Safeguarding Groups.

3.2   The city of Stoke-on-Trent has been identified as a Prevent priority area. The University is represented on the Stoke-On-Trent's Local Authority Prevent Strategy Board, which has been responsible for delivering a range of Prevent initiatives, including:

- working with local schools to promote social cohesion and address intolerance and extremism.
- supporting local communities in raising awareness of extremism and exploring ways in which it can be tackled.
- developing a better understanding of grievances within all communities.
- drawing together senior staff from the health, prisons and higher and further education sections to explore best practice.
- awareness raising of the dangers of online radicalisation.
- and partnership working to address permissive environments.

4. Risk Assessment and Action Plan

4.1   The University has a Prevent Risk Register and Action Plan. This Risk Register reflects the University's local circumstances and sets out both the

controls which are currently in place and the further actions which we intend to take to mitigate the risks we have identified.

4.2 The Chief Operating Officer is the senior owner of the Risk Register and Action Plan, which is monitored by the Prevent Strategy Group.

5. External Speakers and Events

5.1 The University's External Speakers Policy and Code of Conduct has been approved by the University's Academic Board.

5.2
Visiting lecturers and speakers who contribute to the University as part of the curriculum are subject to checks in terms of their right to live and work in the UK. Those checks are enhanced to determine whether the visiting lecturer/speaker gives cause for concern within the context of the Prevent duty. Initial consideration will take place within each School. If there are concerns, then the matter will be referred to the Chief Operating Officer (or nominee).

6. Senior Management and Governance Oversight and Engagement with Prevent Partners

6.1 The University has a Prevent Strategy Group that leads on the Prevent Duty across the University. The Group has formal terms of reference and is comprised of the following:

- Chief Operating Officer (Chair and Institutional Prevent Lead)
- Director of Human Resources and Organisational Development (or nominee)
- Executive Director of Student and Academic Services (or nominee)
- Associate Dean for Students Digital, Technology, Innovationand Business
- Associate Dean for Students Health, Education, Policing and Sciences
- President of the Students' Union
- Chief Executive of the Students' Union
- Director of Estates (or nominee)
- Head of Cybersecurity, Risk and Compliance – Digital Services
- Senior Collaborative Academic Partnerships Officer
- Regional Prevent Lead (as appropriate)

- Head of Risk and Resilience

- Wellbeing and Safeguarding Manager

6.2 The terms of reference of the Prevent Strategy Group are to:

- oversee the implementation and development of the University's Prevent policy and associated procedures.

- ensure appropriate staff are provided with relevant training.
- ensure relevant updates on the Prevent agenda are communicated to staff.
- receive updates on any internal or external issues of concern.
- monitor and ensure implementation of the University's risk assessment and action plan.

6.3   The Chief Operating Officer is the Senior Manager within the University with responsibility for Prevent. In their absence, the Executive Director of Student and Academic Services has operational responsibility for Prevent matters.

6.4   The Board of Governors will receive an annual report on the implementation of the University's Prevent duty during the previous year, including data about referrals to the Channel programme, events and speakers on campus and staff training.

6.5   The Chief Operating Officer has regular contact with both the Regional Prevent Coordinator and Police, as appropriate.

7. Engaging with Students

7.1   The engagement of students with the University's Prevent duty is conducted through the Students' Union. Representatives of the Students' Union are members of the University Prevent Strategy Group and are also represented in the governance structure of the University by sitting on the Academic Board and the Board of Governors.

7.2   Officers of the Students' Union also meet regularly with the Executive Director of Student Development Services and members of the University Executive, which provide opportunities for Prevent related matters to be discussed informally.

8. Staff Training

8.1   All new staff appointments to the University are required to complete the mandatory online Prevent Duty module, upon commencement within post. Monthly monitoring of completion rates is carried out within Schools and Services, and staff are reminded that failure to complete the training by a specified deadline could result in disciplinary action being taken.

8.2   All agency staff at the University also complete the online Prevent Duty training as part of their University induction – this is managed by Unitemps and Human Resources and Organisational Development.

8.3　In addition to this mandatory online training, a range of bespoke training is provided for staff within specialised roles within the University.

9. Sharing Information

9.1　Arrangements to share information about external speakers with the Regional Prevent Co-ordinator are in place.

9.2　In certain circumstances, the University may wish to share personal information about a student or member of staff with a third party, as a result of concerns about that person's wellbeing. The Chief Operating Officer will determine whether such information should be shared, in accordance with the University's data protection arrangements.

10. Pastoral and Chaplaincy Support

10.1　Staffordshire University provides extensive support services for students, more information of which is contained in the University's website and Beacon, the student App.

10.2　There are well developed signposting and referral relationships both across the University and with external providers from statutory, voluntary and community sectors.

10.3　The University's Multi-Faith Chaplaincy employs a Senior Coordinating Chaplain in partnership with the Anglican Diocese. We also have access to volunteer faith advisors from a variety of faiths.

10.4　The main ministry of the Chaplain is pastoral care, and this care is extended to all students regardless of faith, creed or belief. The service of pastoral care is not organised along faith categories. The Senior Chaplain and volunteer advisors are expected to minister to all, regardless of faith tradition, personal belief, gender, sexual orientation or other protected characteristic. Where particular faith acts of worship or ritual are required, the Senior Coordinating Chaplain will invite appropriate ministers to perform those duties. However, the acting minister is expected to operate under the supervision of the Senior Coordinating Chaplain and in accordance with the values of the University.

10.5　One of the cornerstones of the work of the Chaplaincy is to encourage dialogue amongst students from different faith traditions in a safe environment. Students are encouraged to explore their own faith and to learn how that faith impacts on themselves and the world around them. This is achieved through partnerships with local faith communities who share in campus prayers, worship and the celebration of major festivals.

10.6 We recognise that many students have religious and spiritual needs which, when adequately met, can enhance the student experience. As a service the Chaplaincy does not seek to replicate the societies within the Students' Union but seeks to support and encourage their work and offer a professional resource.

10.7 The University Chaplaincy manages spaces for prayer, gathering and worship. Chaplaincy facilities are located on the Stafford Campus, with one dedicated quiet room and separate social space, at the London Campus, and on the Stoke campus with dedicated quiet rooms, prayer facilities and separate social spaces. All spaces are multi-faith facilities. The facilities are managed by the Senior Coordinating Chaplain and are the responsibility of Student and Academic Services.

10.8 Multi-faith room etiquette

The multi-faith spaces are to be free from literature. This is to safeguard against inappropriate tracts and adverts which may cause harm or offence. The multi-faith spaces have a supply of Qurans and Bibles for devotional use, provided by the Chaplaincy to authenticate their content. A clean wall policy is operated to emphasise the multi-faith nature of the spaces and so not to cause offence to other users.

10.9 Multi-faith Social space etiquette

Social spaces may have literature to advertise events, but this must be authorised by the Senior Coordinating Chaplain. Adverts may be placed on dedicated notice boards but must be authorised by the Senior Coordinating Chaplain. No literature of a proselytising nature will be left in social spaces.

10.10 Gender Segregation

The Chaplaincy does not provide separate prayer rooms dedicated for men and women. All facilities are available for people of all faiths or as quiet space for people of no faith.

10.11 Chaplaincy Events

Events and services provided by the multi-faith Chaplaincy are open to people of all faiths and no particular faith. Management of events using the multi-faith Chaplaincy facilities, or the service name remains the responsibility of the Senior Coordinating Chaplain or a person designated by the Senior Chaplain. Visiting speakers at events using multi-faith Chaplaincy facilities or the service name

must be authorised by the Senior Coordinating Chaplain and are subject to the External Speakers process noted above.

11. Use of IT Facilities

11.1   The University has implemented a number of policies and technologies with a view to protecting staff, students and visitors while utilising IT and online resources.

11.2   The University takes a pragmatic approach to security ensuring that, wherever possible, academic freedom and freedom of speech are maintained whilst ensuring that appropriate measures are in place to mitigate and react to potential risks.

11.3   A full set of IT policies is in place to ensure that the use of IT equipment and resource is appropriate and controlled. In addition to this, monitoring tools are utilised to log web access and technical controls are in place in order to allow forensic investigation exercises to be undertaken if required.

11.4   University IT regulations set out our approach to acceptable use and provide the overarching guidance for students, staff and authorised users of IT systems. These regulations contain details of what University systems and IT resources can be used for, including any legal requirements. University [IT regulations](#) state that 'the use of IT facilities, to support terrorist activity is not permitted and may result in a criminal charge. Access to material promoting terrorism is not permitted, unless this access has been specifically allowed by the University Ethics Committee.

11.5   The University Internet Usage Policy places responsibility for website content with the Executive Dean of Schools or Director of Service and states that they must comply with all legal requirements, this includes any links to external sites. In addition to this, best practice guidance is distributed to anyone known to be setting up or having set up a website or social media account. The University utilises Social Media monitoring tools in order to measure social media presence, in addition these tools are used to identify anybody using the University or any associated brand.

11.6   Web filtering is a highly debated subject within the University sector and is therefore continually reviewed by Digital Services. Particular areas of consideration include:

- The perceived risk to staff and students
- Monitoring tools are utilised which allow Digital Services staff to view websites visited allowing decisions to be made as to the current risk.

- The legality of inspecting and filtering content
- There is considerable debate regarding the interception of encrypted content, although laws are yet to be confirmed. As the Web progressively moves to encrypted websites and messaging systems it becomes increasingly imperative that encrypted content be decrypted and inspected for a web filtering service to be effective.
- Ethical implications / academic freedom
- Web filtering is put in place to limit a user's Internet Freedom. It is argued that blocking parts of the Internet is against the principles of academic freedom.
- Effectiveness of controls.
- There are various methods to deliver Internet filtering and consideration must be given to the user's ability to bypass systems either through changes to the end user device or the use of Tor proxies. In addition, we must consider the wide variety of device types and versions present within the University.

11.7   The web filtering response process can be found in Appendix 1. The University considers its legal duties and responsibilities to uphold freedoms of speech, exercise its Prevent duty, and its responsibility to safeguarding the wellbeing of students and staff when deciding if a response to web filtering activity is required. These decisions are made by the operation prevent team which comprises members of the University Prevent Strategy Group.

11.8   The University IT Regulations include: 'Any breach of these regulations shall be dealt with in accordance with the disciplinary procedures of the University applicable to the User concerned.' and 'Any loss of University data, distribution of confidential data beyond intended recipients/users, suspected unauthorised access to data, potential misuse of systems, or known vulnerability in a system must be reported to Digital Services.'

11.9   This ensures that all IT security breaches are reported to Digital Services. Following receipt of this information there is an internal process which is followed. A summary of IT security breaches is presented by Digital Services to the Prevent Strategy Group.

11.10 All IT policies apply to students, staff and authorised users. As an Authorised User the IT Regulations applies to the Students' Union and other bodies who utilise University infrastructure to deliver services such as their own websites, as such the Internet Usage policy would apply to all websites created and run from University systems. However, websites created and hosted externally by the Students' Union or societies are not in scope of any current University IT policies. The University Digital Services team is currently working closely with the Students' Union and other societies with a view to aligning policies across the two organisations.

11.11 The assessment of University's Digital Services department is that there is sufficient policy and technology in place in order to protect students, staff and visitors. However, recognising the evolving nature of technology and threats, a continual improvement model is adopted to ensure that the University is constantly working to improve policy, technology, security and performance for anyone who utilises University IT systems.

12. Concerns about a student or member of staff

12.1 A student or member of staff may identify concerns about a student or staff member potentially being drawn into violent extremism or terrorism based on information received or behaviour which had been observed.

12.2 Indicators of concern might include:

- threats of violence.
- use of extremist language.
- expressions of extremist views and sharing of extremist materials, including on social media.
- possessing, accessing or requesting extremist materials, unless authorised to do so for academic study.
- or indirect disclosure from the individual, friends or family about vulnerability to being drawn into terrorism or violent extremism.
- enabling individuals who are not members of the University community to access University grounds or buildings, where those individuals are a known cause for concern in the context of this policy.

12.3 Where such concerns are identified, the individual should immediately refer these to:

- Concerns about students: The Executive Director of Student and Academic Services via email to student-wellbeing@staffs.ac.uk .
- Concerns about a member of staff: Director of Human Resources & Organisational Development via email to askHR@staffs.ac.uk.

If the concern leads the individual to believe that there is a threat to life or that the subject of concern is in serious and immediate danger, the individual should call the police on 999.

12.4 Where concerns are identified, these need to be shared in a safe, supportive and confidential fashion in order to enable the concerns to be investigated and, if appropriate, appropriate interventions to be determined and implemented. At the same time, it is vital that any referrals are investigated thoroughly and fairly. The University's approach to any concerns raised about a student or member of staff is to safeguard the individual about whom concerns have been expressed.

12.5   Where a concern has been received through this process, the matter will initially be considered by the Executive Director of Student and Academic Services (in the case of students) or nominee or Director of HROD (in the case of staff) or nominee. If the initial consideration of the case establishes grounds for the matter to be reviewed further, then a full investigation will take place to gather the key information and evidence to allow full consideration of the circumstances of the case. Depending upon the circumstances, this may involve meeting with the student or member of staff about whom the concern has been raised.

12.6   The University may seek advice from the Counter terrorism West Midlands Prevent Team or the Regional Prevent Lead when determining what actions should be taken, if appropriate.

12.7   The likely outcomes associated with this initial investigation are that:

i)   No further action is required. In this case, a confidential record will be held by the Student and Academic Services or the Director of HR & OD.

ii)   Where there are some grounds for concern, at this stage only internal action is required. The Executive Director of Student and Academic Services or the Director of HR & OD will determine, with relevant staff members, the interventions to be put in place. It may be necessary to utilise, in the case of staff, the Disciplinary Procedure or, if the case involves a student, the student conduct, fitness to study or fitness to practice procedure. The actions and a review date will be communicated orally and in writing to the student or member of staff. At the point of the review, the case will be reviewed again, and the appropriate actions taken (as 12.7i) to iii)).

iii)   external referral is required. Depending upon the nature of the concern, there are likely to be two possible outcomes: a) Referral to the police if there is evidence to indicate that a criminal act may be committed or has already been committed OR b) Referral to the Counter-terrorism West Midlands Police Prevent team for consideration and/ or referral to the Channel Programme (a multi-agency panel established as part of the Prevent policy to identify and support individuals who are susceptible to being drawn into terrorism). Where an external referral is required, the Executive Director of Student and Academic Services (or nominee) or Director of HR & OD must discuss the matter with the Chief Operating Officer and the Vice Chancellor (or nominee) before such a referral is made.

12.8   The University is required to provide to the Office for Students (OfS) with data relating to the Prevent Duty, referrals to Channel, web filtering alerts and

student welfare. This forms part of the statutory assurance processes required by the Department for Education for Higher Education Providers. The Prevent Annual Report is approved by the Governors annually ahead of the statutory OfS data return.
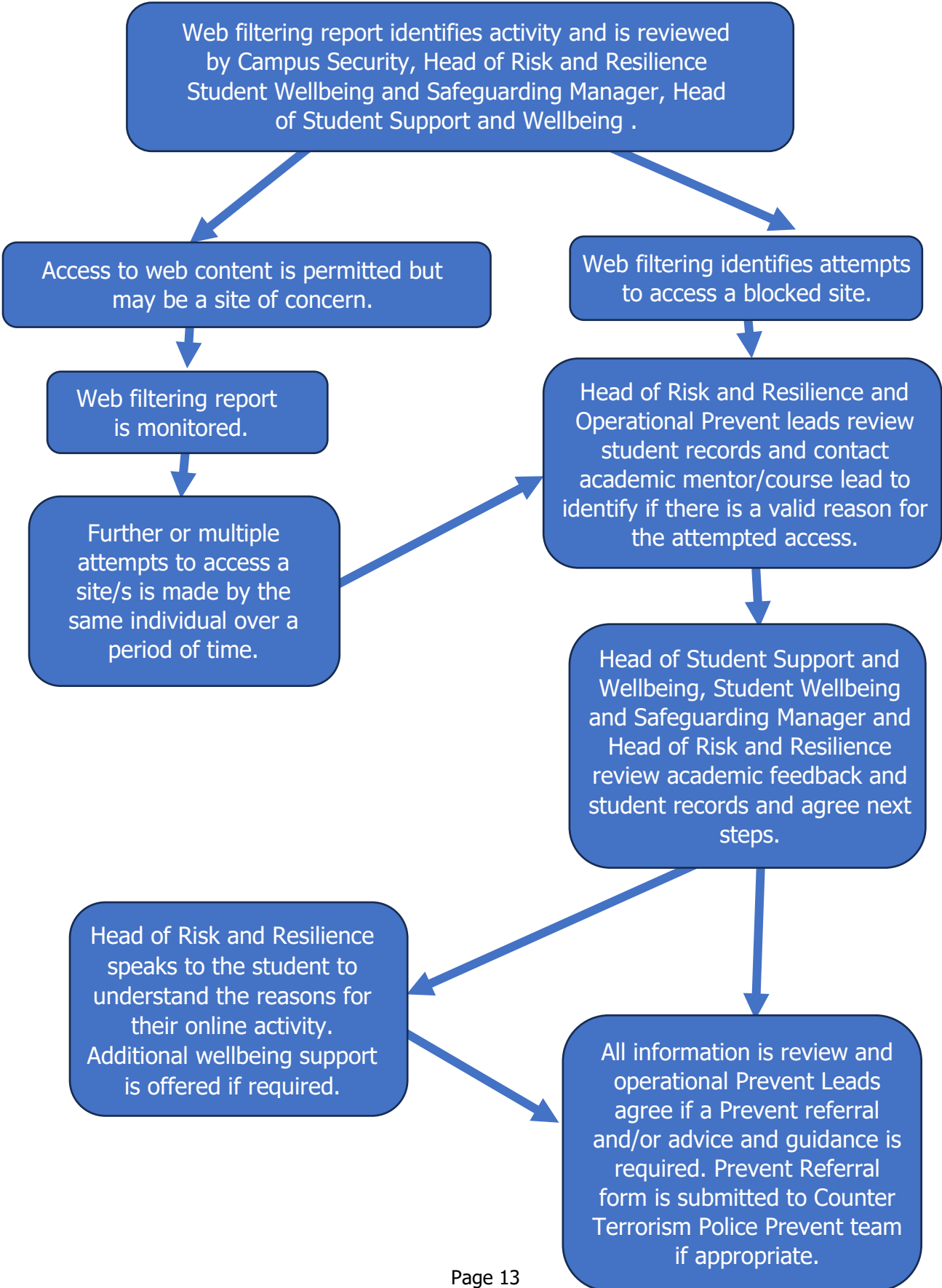
13. Students' Union

13.1 The statutory Prevent duty does not apply directly to the Students' Union, as it is constituted as an independent charitable body. Nevertheless, cooperation from the Students' Union is important as it will assist the University to fulfil its statutory duties.

13.2 The Students' Union is represented on the University's Prevent Strategy Group.

13.3 The University has established effective co-operative arrangements with the Students' Union with respect to: i) Management of external speakers and events – all bookings for external speakers and events requested by the Students' Union or its societies that are flagged as a concern are considered by the Executive Director of Student Development Services. ii) Welfare and pastoral support – where a student of a Students' Officer has concerns that a student may be susceptible to being drawn into terrorism, they should be encouraged to raise the concern through the escalation process set out in this document (section 11). iii) Training – staff of the Students' Union and elected officers will be invited to attend and complete Prevent training events facilitated by the University.

Next Review Date:	April 2025
Policy Owner:	Chief Operating Officer

Appendix 1 Web Filtering response process

Web filtering report identifies activity and is reviewed by Campus Security, Head of Risk and Resilience Student Wellbeing and Safeguarding Manager, Head of Student Support and Wellbeing .

Access to web content is permitted but may be a site of concern.

Web filtering identifies attempts to access a blocked site.

Web filtering report is monitored.

Further or multiple attempts to access a site/s is made by the same individual over a period of time.

Head of Risk and Resilience and Operational Prevent leads review student records and contact academic mentor/course lead to identify if there is a valid reason for the attempted access.

Head of Student Support and Wellbeing, Student Wellbeing and Safeguarding Manager and Head of Risk and Resilience review academic feedback and student records and agree next steps.

Head of Risk and Resilience speaks to the student to understand the reasons for their online activity. Additional wellbeing support is offered if required.

All information is review and operational Prevent Leads agree if a Prevent referral and/or advice and guidance is required. Prevent Referral form is submitted to Counter Terrorism Police Prevent team if appropriate.

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