

Prevent Policy and Code of Practice (Events and External Speakers)

Student Experience

Version 2.0

Version Control			
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Contents:

1. Introduction to Prevent and Legal Framework
2. Solent University Approach and Expectations
3. Designated Prevent Lead, Governance and Partnerships
4. Code of Practice Events and External Speakers
 - Introduction to the Code of Practice
 - Freedom of Speech
 - Application of the Code and Risk Assessment
 - Authorisation of Event and/or Speaker
 - Management of Event and Conduct
 - Communication
5. Safeguarding, Prevent Referral and Channel Panel
6. Online Safeguarding
7. Prevent Training
8. Office for Students Annual Return
9. Appendices:
 - Appendix A - Prevent Event and Speaker Guide and Process Documents
 - Appendix B - Glossary of Terms
 - Appendix C - Relevant Legislation

1. Introduction to Prevent and Legal Framework

- 1.1 In 2011 the government published a Prevent Strategy as a part of the overall counter terrorism strategy known as CONTEST. The strategy includes all forms of terrorism and nonviolent extremism and is relevant to all kinds of terrorist threats in the UK.
- 1.2 The aim of the Prevent Strategy is to reduce the threat to the UK from terrorism by stopping people becoming terrorists or supporting terrorism. In the Act this has simply been expressed as the need to “**prevent people from being drawn into terrorism**”.
- 1.3 The Prevent Strategy has three specific strategic objectives:
 - Tackle the causes of radicalisation and respond to the ideological challenge of terrorism.
 - Safeguard and support those most at risk of radicalisation through early intervention, identifying them and offering support.
 - Enable those who have already engaged in terrorism to disengage and rehabilitate.
- 1.4 In 2015 the Counter-Terrorism and Security Act placed a duty on certain bodies, referred to as ‘specified authorities’ making it a statutory requirement that in the exercise of their functions, they should have “due regard to the need to prevent people from being drawn into terrorism”. This guidance is issued under section 29 of the Act and the duty applies to all Relevant Higher Education Bodies (RHEBs).
- 1.5 As a part of this duty the University will ensure that it has the relevant policies and procedures in place to demonstrate the ‘due regard’ requirement of this statute. For more information, please use this [hyperlink](#).
- 1.6 A national regulatory framework is in place which is overseen by the Office for Students (OfS) (see section 8) and supported by the Department for Education (DfE). These bodies support, guide and hold the RHEBs to account ensuring fulfilment of their Prevent duty. The University is committed to working closely with these bodies and alongside local partner agencies who also hold statutory responsibilities under the Prevent duty including the Police and the Local Authority.

2. Solent University Approach and Expectations

2.1 Solent University has adopted a proportionate and risk-based approach to the Prevent Duty which is delivered and supported by the Student Experience team.

2.2 In fulfilling its duty of care and due regard the University is committed to the delivery of the regulatory requirements as determined by the OfS framework. This will be achieved alongside the delivery of the University safeguarding and wellbeing provisions. The University will:

- Have a clear, accessible, and up to date Code of Practice
- Have an [ICT Acceptable Use Policy](#) and [Internet Usage Policy](#)
- Maintain strong partnership links with key agencies including DfE, the Police and the Local Authority and work collaboratively with the Safe City Partnership and the Local Safeguarding Adult Board and Safeguarding Children Partnership
- Have a proportionate and clear process related to external speakers and events on campus and online to enable an assessment of risk
- Have a system for tracking, assessing, and mitigating risks for those events and speakers assessed as medium or high risk, whilst maintaining the existing duty to promote freedom of speech
- Engage proactively with the Student Union to enable student insight into the Prevent Policy and Procedures
- Arrange Prevent awareness and operational training for staff (see section 7)

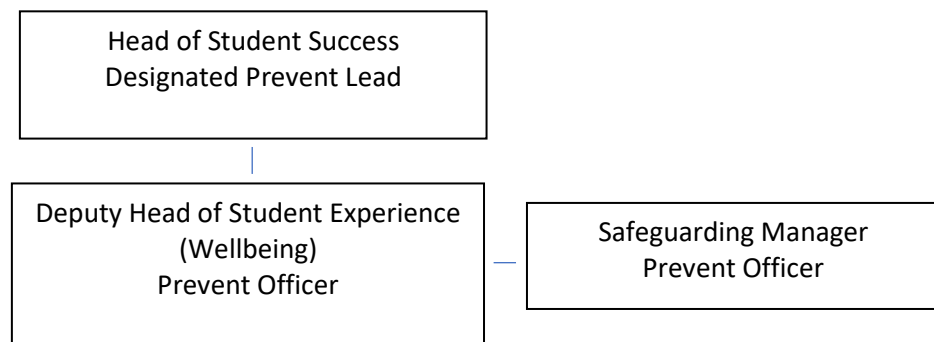
Further to this the University will:

- Fulfil the requirement to submit the annual Accountability and Data Return (ADR) to the OfS (see section 8)
- Have in place a Safeguarding Policy which incorporates Prevent (see section 5)
- Ensure that Prevent is a standing item for the Safeguarding Committee with oversight from the relevant University governance processes (see section 3)

For further information regarding the duty and the statutory requirements please use this [hyperlink](#).

3. Designated Prevent Lead, Governance and Partnerships

- 3.1 The University Designated Prevent lead and Prevent Officer(s) (as identified in the graphic below) sit within the Student Experience service. The Prevent Lead and Officers are responsible for overseeing the Prevent Policy and Code of Practice and ensuring that the wider University complies with the ‘due regard’ duty. Student Experience will also lead on delivery of operational response for safeguarding cases which may be Prevent related.



- 3.2 Governance for Prevent sits within the remit of the University Safeguarding Committee with subsequent reporting into the Equality and Wellbeing Committee and Board of Governors. The University is additionally represented on the Southampton Prevent Partnership Board which operates as a subcommittee to the Safe City Partnership. For further information please use this [hyperlink](#).
- 3.3 This Prevent Policy requirements may also apply to third party vendors providing services within and to the University campus where deemed proportionate and relevant to do so.

4. Code of Practice: Events and External Speakers

- 4.1 In fulfilling its statutory duty for ‘due regard’, the University has incorporated the Code of Practice and the associated procedures within its overarching Prevent Policy.
- 4.2 The University reserves the right to invoke this code where there is good reason to believe that there is the potential advocacy of violent extremism that could constitute a breach of the law on its premises or within its organised events.

4.3 Introduction to the Code of Practice:

4.3.1 Solent University values in upholding the Freedom of Speech are in line with the University stated values, the University positively welcomes the contributions made by visiting speakers and externally organised events in enriching its educational and social mission, as well as deepening engagement with its communities and stakeholders.

4.3.2 At the same time, the University is aware that it has a duty to provide a healthy and safe environment and must consider its legal obligations regarding activities on its premises which might lead to incitement of violence, racial or religious hatred or a breach of the peace, or otherwise transgress the bounds of lawful speech.

4.3.3 In this context, University premises include those owned, operated, and/or managed by the University, and includes the Student Union buildings or facilities and will apply to third party providers operating a service within the University.

4.3.4 All participants and those attending an approved external meeting, or one where a visiting speaker is giving an address, will be required, and expected to refrain from acting in an unlawful or dangerous manner. Any departure or infringement of this code may lead to use of a University disciplinary process and/or where there is a breach of law the University will assist the prosecuting authority.

4.3.5 The University recognises that approved external speakers may represent views with which staff and students disagree. The University supports the right to peaceful protest and freedom of speech and the expectations set out above do not seek to restrict that right.

4.4 Freedom of Speech:

4.4.1 The University regards Freedom of Speech as an essential element of academia and in the interests of our student and staff body remains committed to academic freedom and its core values of social justice, inclusivity, transparency, and openness. Prevent is not about restraining freedom of speech and Solent University aligns with the objective of securing freedom of speech within the law, ensuring there is no adversarial outcome for those committed to questioning and testing

received wisdom and putting forward new ideas or controversial or unpopular opinions.

4.4.2 In recognition and pursuance of its duties as laid down in Section 43 of the [Education \(No 2\) Act 1986](#), the University issues this Code of Practice which sets out reasonable actions to ensure that externally organised events, and any event with a visiting speaker (in person or virtually/online), takes place within the confines of the law ensuring freedom of speech for members, students, and external speakers.

4.4.3 The University will collaborate with the Student Union to ensure matters of Freedom of Speech are upheld across both organisations and follow guidance as outlined by the OfS to ensure mandatory conditions are met.

4.5 Application of the Code and Risk Assessment:

4.5.1 This code applies to any externally organised meeting or other activity involving a visiting speaker which is to be held on University premises or within the University's online provision e.g. speakers hosted virtually by the University. In addition, this Code applies to off-campus branded events where the University is the lead organiser, for example, recruitment events and networks, and forums hosted in an external venue.

4.5.2 For all such events and speakers, it is mandatory for the event organiser to use the Events and Speakers Process Pathway (see [Prevent Portal](#) pages). The appropriate risk assessment will be undertaken and assessed and determined using the table below. A record of all events and speakers assessed as medium and high risk will be maintained by the Prevent leads for audit and regulatory purposes. Please refer to the Appendices for the relevant risk assessment templates.

Risk Table

Low	<ul style="list-style-type: none"> - Subject matter does not invite serious disagreement, controversy, or disruption - No open-source information indicating any associated risk - No identifiable prior issues causing protest or serious disagreement - Unlikely to attract any media or other attention that may lead to reputational risk
Medium	<ul style="list-style-type: none"> - Risk that the topic may be likely to attract protest or serious disagreement - Open-source information or evidence of previous disruption at similar events at the University or elsewhere - Event requires security personnel or significant stewarding - Is likely to attract media attention or has done so previously that may lead to unmanageable reputational risk
High	<p>All areas identified within medium risk Plus:</p> <ul style="list-style-type: none"> - Where there is an established concern or reasonable expectation that the presence of the speaker that could constitute a breach of the law - Organisation or speaker known to partner agencies as demonstrating ‘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.’

4.5.3 It is the responsibility of all Faculties and Departments to ensure their staff are up to date with this process and policy and understand that not providing full information in a timely manner renders risk that the event will not be able to proceed.

4.6 Authorisation of Event and/or Speaker:

4.6.1 The Designated Prevent Lead/Officers hold responsibility for authorising events determined to be medium and high risk, there will also be additional oversight from the University Research Ethics and Integrity Committee (UREIC) Chair where there is high risk or exceptional circumstances to enable these issues to be independently considered. The designated staff reserve the right to put in place conditions or undertake action to mitigate against any identified risk or deny an event taking place where the risk is exceptionally high, or where a breach of law may occur on the premises. Where this occurs and raises dispute this can be appealed by the event organiser via the Prevent Lead/Officers to the UREIC Chair who will act as an independent arbiter. Example conditions may be, but not limited to:

- Public not being allowed to be invited
- Admission may be restricted and controlled by tickets or identity card (or both)

- Escort arrangements for the speaker
- The presence of stewards or University security staff (this has cost implications for the organiser)
- Restriction on admission of press, television, broadcasting personnel or social media publicity
- Appointment of a member of staff as a ‘controlling officer’

4.7 Management of Event and Conduct:

4.7.1 The principal organiser, and where relevant the chairperson for the event, will have duty to secure, as far as possible, both the audience and the speaker and ensure that they act in accordance with the law during the event. In cases where conduct is deemed to be in breach of the law the principal organiser and/or chairperson is required to give appropriate warning and in cases where it continues will be required to request the withdrawal or removal of the person concerned or to close the meeting. Security or Police may be called if required.

4.7.2 Any offence or misconduct arising from the event linked to a staff member or student may result in the use of the [Staff Behaviour](#) and [Disciplinary Policies](#) or the [Student Disciplinary Procedure](#) and may also result in a report being made to the relevant authority, for example the Police.

4.8 Communication:

4.8.1 The University will communicate and promote the Prevent Policy and Code of Practice annually to staff and to students via the Student Union, this will be completed using a range of internal communications tools, including the staff and student portal, newsletters, and briefings.

4.8.2 This Code of Practice will be subject to review on an annual or ‘as needed’ basis by the Safeguarding Committee Board with oversight from the Equality and Wellbeing Committee and Board of Governors.

5. Safeguarding, Prevent Referral and Channel Panel

5.1 Unless there is an immediate and identifiable risk or explicit threat of terrorism the University will adopt a safeguarding and wellbeing approach to students who may be at risk of radicalisation or being drawn into terrorism. This approach will include a referral to Prevent/Channel Panel where it is deemed necessary.

- 5.2 The University has in place a [Safeguarding Policy](#). The Policy sets out the University's approach to safeguarding children, adults with care and support needs, and students who maybe, or become, an adult at risk. It is supported by operational guidance which provides relevant detail in relation to the safeguarding measures available to mitigate potential areas of perceived risk including how to report and manage a safeguarding matter or cause for concern. This Prevent Policy will operate in conjunction with the Safeguarding Policy.
- 5.3 The University does not expect staff to expressly work out if a safeguarding concern for a student is related to an issue under Prevent therefore when a member of staff identifies a safeguarding concern for a student, they will utilise the general [Safeguarding Referral form](#) as outlined in the Safeguarding Policy.
- 5.4 If a student is identified as being vulnerable to radicalisation, extremism or terrorism the Prevent process puts in place support and the relevant safeguards to help. If the Solent University Safeguarding team identify safeguarding concerns that require an external referral to Local Authority or Police Prevent leads, wherever viable this will be done in a transparent way with the student, unless there is a risk associated. The referral will be submitted and follow the Prevent referral pathway, for more information please use the [hyperlink](#).
- 5.5 The referral may result in a case discussion at what is known as the Channel Panel - this is an early intervention multi-agency safeguarding programme available in every Local Authority area in England and Wales. It works to protect vulnerable people from being drawn into terrorism and provides a range of support including mentoring, counselling and assistance with other life needs i.e., housing.

6. Online Safeguarding

- 6.1 In its delivery of safeguarding and the 'due regard' duty, the University is committed to ensuring that a safe and supportive environment exists for all staff, students and third parties engaging in online activity on University Wi-Fi, IT systems and software.
- 6.2 The University has in place the Information Technology Acceptable Use and Internet Usage Policies as listed in section 2, these policies govern usage for all staff, students and third parties accessing the University systems. Furthermore, the University has in place a mechanism to audit websites being accessed that may be of concern or linked to extremism. If misuse of University ICT is identified, then this

may result in use of either staff or student disciplinary policies. If linked to a third party this will be raised via the relevant University lead for investigation and resolution.

7. Prevent Training

- 7.1** Prevent training is mandatory for all University staff. It is a part of a package of essential training for all new starters and is repeated every 2 years. The Prevent lead and officers will undertake additional training on a more adhoc basis where it is made available via DfE, OfS, the Home Office and the local Prevent Board.
- 7.2** Further general safeguarding training will be delivered in a range of formats and will include operational processes and thematic training linked to a range of issues under the safeguarding umbrella.

8. Office for Students Annual Return

- 8.1** The Office for Students requires all established RHEBs to submit an annual Accountability and Data Return referred to as an ADR. As a part of this return the University will risk assess its position regarding Prevent and produce an action plan to address any gaps identified. The information provided includes contextual information which enables OfS regulators to understand the University's approach to implementing its duty against the Prevent regulatory framework.
- 8.2** This work is led by the University Prevent Lead and Prevent Officers within Student Experience who will provide the Board of Governors with a briefing in Semester 1 outlining the findings and action plan for the annual review. Once the Board of Governors are assured that the duty has been fulfilled and any gaps in provision are being addressed the Annual Accountability Declaration is ratified and signed by the Chair of the Board of Governors and submitted to the OfS.

9. Appendices

Appendix A - Prevent Events and Speaker Guide and Process Documents

Please use the links provided for information on the Events and Speakers Process Pathway and risk assessment templates (use [Prevent Portal](#) pages)

- For Students Union Information please use this [hyperlink](#)
- For Events and Speakers booked via the University Events team please use this [hyperlink](#)
- For all other Prevent information use this [hyperlink](#)
- For Safeguarding information use this [hyperlink](#)

The University Prevent Lead/Officers will require any assessment resulting in a medium or high-risk determination to be emailed to them at safeguarding@solent.ac.uk 15 working days in advance of the event. This enables the required quality assurance, final risk assessment and timely decision making.

Appendix B - Glossary of Terms

Safeguarding: The action taken to promote the welfare of children and adults with care and support needs and protect them from harm including from abuse, maltreatment, and neglect.

Terrorism: The Terrorism Acts of 2000 and 2006 define certain criminal activities relating to terrorism in terms of inciting acts of terrorism, disseminating terrorist publications or belonging to or supporting proscribed organisations. Terrorism is defined as including the use or threat of serious violence against a person or serious damage to a property for the purpose of advancing a political, religious, or ideological objective

Radicalisation: The process by which a person comes to support terrorism and extremist ideologies associated with terrorist group.

Extremism is described by government 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.”

Appendix C - Relevant Legislation

The Human Rights Act: Freedom of thought, conscience, and religion (Article 9); freedom of expression (Article 10); and freedom of assembly and association (Article 11) are safeguarded

by the European Convention on Human Rights and incorporated into UK law by the Human Rights Act 1998.

The Equality Act 2010: Places a duty on the University to eliminate discrimination, harassment and victimisation and further to foster good relations between all members of the University community.

The Public Order Act 1986: contains a range of criminal offences relating to violent conduct, speech or actions that threaten violence or cause fear, harm or distress. The Act also makes it an offence to use threatening, abusive or insulting words or behaviour either with the intention of stirring up racial and religious hatred, or in circumstances where it is likely racial or religious hatred will be stirred up as well as stirring up hatred on grounds of sexual orientation.

The Education Act (No 2) 1986: (Section 43) imposes specific obligations on universities to promote and protect freedom of speech and requires that universities: “shall take such steps as are reasonably practicable to ensure that freedom of speech within the law is secured for members, students and employees of the establishment and for visiting speakers.” The Act includes a duty on university governing bodies to issue and keep updated a code of practice setting out the procedures to be followed by members, students and employees in connection with meetings on the university’s premises.

Higher Education (Freedom of Speech) Act 2022: This Act intends to ‘Make Provision in relation to the freedom of speech and academic freedom in Higher Education institutions and in Student Unions for connected purposes.’ This proposed Act amends sub sections of the Higher Education and Research Act 2017, the Counter Terrorism and Security Act 2015, The Education Act (No 2) 1986 and the Higher Education Act 2004. The Act does not yet have Royal Assent.