

Solent University

Prevent Duty Risk Assessment and Action Plan

1. Statutory guidance issued under section 29 of the Counter Terrorism and Security Act 2015 requires the University in exercising its functions to have due regard to '*preventing people from being drawn into terrorism*'; this is the Prevent duty.
2. To comply with the Prevent duty, providers need to:
 - assess the risks associated with Prevent and draw up a plan to mitigate these
 - have effective welfare support systems, linking to DfE Prevent coordinators, local authorities or the police if necessary
 - have systems for assessing and mitigating risks around external speakers and events on campus, while maintaining the existing duty to promote freedom of speech
 - arrange ongoing Prevent training for relevant staff
 - have an IT usage policy, and where appropriate a research policy, which cover the Prevent duty
 - engage with students and ensure that students' unions and societies are aware of policies concerning activities on campus.
3. This Solent University Prevent risk assessment includes an evaluation of how well the steps recommended in the guidance and OfS Framework are being implemented at the University.
4. The 'Further Action required' columns are the 'Action Plan' to complete the exercise and maintain the work to ensure that the University is meeting its obligations under the Prevent duty.
5. Those responsible for taking action are identified in the first column.
6. The following ratings provide an estimate of risk, as follows;
 - A** Low risk; main activity is monitoring implementation and review
 - B & C** Medium risk; main activities are producing appropriate procedures and processes, documenting them and approving them
 - D** High risk; main activities are scoping the needs for procedure and processes.

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All staff have a responsibility to support the University's Prevent duty, however, the following members of staff have a specific safeguarding role including Prevent.

KS - Professor Karen Stanton, Vice-Chancellor (V-C), Prevent Accountable Officer

JI – Jim Irving, Chief Student Officer and University Secretary

AB – Alexandra Banks, Head of Student Success, Prevent Lead (from 1.12.21)

DI – Daniel Inns, Deputy Head of Student Experience (Wellbeing), Prevent Officer

CP – Charlie Perrin Safeguarding Manager Prevent Officer (from 10.01.22)

AS -Andy Squire, Chief Executive, Solent Students' Union

Safeguarding Committee:



Solent University
Safeguarding Struct

Factor in the Prevent duty guidance	rating	Risk	Actions already taken	Further action required
<p>A.</p> <p>Arrangements for:</p> <ul style="list-style-type: none"> ■ Senior management and governance oversight ■ Engagement with Prevent partners. <p>Those responsible: KS, JI, AB, DI, CP and nominated representative of P&D</p>	A	LOW	<ol style="list-style-type: none"> 1. Prevent is covered as a standing item in the Safeguarding Committee with representation from all faculties and key professional services. This is chaired by the Deputy Head of Student Experience (Wellbeing) and reports into the Equality, & Wellbeing Committee for governance and oversight. 2. In addition to receiving updates (as appropriate) the Board of Governors (BoG) approve the Prevent Accountability Return and action plan in November of each year. 3. The University has regular contact with the following external stakeholders for the purposes of Prevent: <ul style="list-style-type: none"> ■ Hampshire Constabulary and other constabularies where required ■ The Southampton Prevent Board which includes representation from the South East Counter Terrorism Unit (SECTU). 	<ol style="list-style-type: none"> 1. Continue to ensure policy and action is informed by liaison with internal and external stakeholders. 2. Continue to update the VCG, BoG and wider students and staff and maintain representation and contact with local stakeholders and groups as appropriate

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			<ul style="list-style-type: none"> ■ Department for Education (DfE). This has included working with Alamgir Sheriyar as Prevent Regional HE/FE Co-ordinator – South East of England. Alamgir is a member of the Safeguarding Committee and provides guidance where required. <p>4. The new Safeguarding Manager has been in post since January 2022.</p>	<p>3. Ensure that Prevent is not confined to events and speakers. To ensure risk assessment and action is taken on a wider scale in terms of educating students and staff about Safeguarding and Prevent and supporting them to access the relevant support as and when required.</p> <p>4. To update the University Safeguarding structure following overarching changes to personnel in 2022-2023.</p>
<p>B. Risk assessment and action plan Those responsible: JI, AB, DI and CP</p>	A	LOW	<p>1. This document describes ‘actions taken’ and ‘further action required’, thereby enabling the University to make clear how it is assessing the risks associated with Prevent and planning mitigations that respond to them.</p>	<p>1. Continue to maintain and update this document i.e. risk assessment and action plan at least on an annual basis ensuring that the University approach to Prevent is always fit for purpose.</p> <p>2. To explore a more accurate</p>

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				mechanism/ICT solution to collate data on Events and Speakers and Prevent related data.
<p>C. Ensuring that students' unions and societies are aware of policies concerning activities on campus. Those responsible: AS, DI, CP</p>	A	LOW	<ol style="list-style-type: none"> 1. The University and the Solent Students' Union (SoSU) have a commitment to work in partnership for the benefit of students at the University. 2. Student Experience staff work closely with SoSU. The SoSU is fully integrated into the life of the University with SoSU staff and sabbatical officers represented on all University Committees and working groups, including the Inter-Faith Forum, Safeguarding Committee and Academic Board. 3. SoSU has policy and procedures for societies who wish to invite external speakers to events, including a booking form and risk assessment which aligns with University processes. 4. SoSU has been integral to the re-development of the Events and Speakers process to ensure it is streamlined and risk focused. The new process has been distributed to all involved parties with the relevant risk templates. 	<ol style="list-style-type: none"> 1. Continue to integrate Solent Students' Union into the work of the University. 2. Safeguarding Manager to continue to provide Safeguarding training for the SoSU including on Prevent 3. SoSU to continue to proactively engage with Student Experience on events and speakers and any matters relating to the HE Freedom of Speech Bill.
<p>D. Arrange ongoing Prevent training for relevant staff and communications to students Those responsible: CP, LB and nominated representative from P&D</p>	A	LOW	<ol style="list-style-type: none"> 1. All Solent staff are required to undertake Prevent Training as part of their Essentials training at Induction and then updated every 2 years. 2. Alamgir Sheriyar of the DfE, and the Southampton Prevent Board also provide updates, guidance, and training. 3. The Safeguarding Manager has supported the implementation of Safeguarding Training which includes Prevent. 4. The Safeguarding Manager and Deputy Head of Student Experience (Wellbeing) with Learning Technologies has ensured that the new 	<ol style="list-style-type: none"> 1. P&D will maintain delivery of training including for new staff and repeat training for existing staff after 2 years 2. The Safeguarding Manager will continue to communicate to

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			<p>Home Office training slides have been incorporated into the Essentials package for staff.</p> <p>5. The Campus & Residential Services Manager refreshed 'Run, Hide Tell' communications during Welcome Week 2022 and the Safeguarding Manager has input information and guidance on Prevent and 'Run Hide Tell' on the Crime Prevention and Safeguarding pages on SOL. These will continue to be refreshed accordingly.</p> <p>6. The Prevent portal pages have been updated to ensure the most up to date information is incorporated</p>	<p>staff and students around Prevent and will manage key cases and keep the risk assessment and action plan up to date.</p> <p>3. The Campus & Residential Services Manager to periodically communicate 'Run, Hide, Tell' messages</p>
<p>E. Arrangements for sharing information about vulnerable individuals internally and externally Those responsible: DI, CP, SL</p>	A	LOW	<p>1. Information is shared between professional (support) services on an as-needed basis, respecting confidentiality and the General Data Protection Regulations (GDPR) to deliver high quality information, advice, and guidance.</p> <p>2. The University Safeguarding Policy has been redrafted and due for publication in November 2022 this has a section dedicated to Prevent and dovetails with the Prevent Policy.</p> <p>3. The University Safeguarding Committee has been recreated and meets 3 times per year with additional CPD relating to Safeguarding and Prevent made available to the Principal Safeguarding Officers who sit on the committee.</p> <p>4. The Safeguarding Manager has written a new Prevent Policy which incorporates and emphasises the importance of safeguarding in Prevent and includes the role of the Home Office support framework the 'Channel Panel'. The new policy was ratified by the Equality and Wellbeing Committee and published on 31st October 2022.</p>	<p>1. To continue to work alongside statutory partner agencies strategically and operationally</p> <p>2. To continue to be guided by national Prevent guidance and findings with particular focus on students being referred through Prevent who are neuro diverse.</p> <p>3. The Deputy Head of Student Experience (Wellbeing) to initiate information sharing</p>

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			<ol style="list-style-type: none"> 5. The Safeguarding Manager has put in place new safeguarding referral processes and templates to help guide staff and students through the most appropriate support channels to ensure support is targeted and avoiding unnecessary referrals into the Channel Panel. 6. The Safeguarding Manager has put in place a Risk Management Process with supporting templates to help assess, plan and mitigate risk for students and staff 7. The University has in place a 'Cause for Concern' process led by the Deputy Head of Student Experience (Wellbeing) that is an internal 'multi- disciplinary service' approach to supporting some of the most vulnerable students at risk of non-completion or leaving the University. 8. External information-sharing is informed by good working relations with local Police, with due regard to the principles of GDPR and safeguarding children, adults with care and support needs, and students at risk. This will include sharing intelligence with the police and where proportionate and lawful to do so share safeguarding or risk concerns with other institutions i.e. fellow HE providers. 9. The Safeguarding Manager alongside Information Governance have revised the Information Sharing Agreement with Hampshire Constabulary. 10. The Safeguarding Manager has outlined to the statutory Safeguarding Adults Board its Safeguarding Action Plan and has requested a volunteer member of that group to sit on the Safeguarding Committee to operate as a 'critical friend.' 	<p>protocols with private halls providers.</p>
<p>F. Policies and procedures and systems for assessing and mitigating risks in relation to external speakers and events on campus, while maintaining the</p>	A	Low	<ol style="list-style-type: none"> 1. As per the 2021 Prevent action plan the Safeguarding Manager has updated the University Code of Practice and this is now incorporated into the new Prevent Policy which was published on 31st October 2022. 2. The new Prevent Policy sits alongside a new streamlined Events and Speakers process. The new process ensures that processes and 	<ol style="list-style-type: none"> 1. Safeguarding Manager to review the Prevent Policy and Code of Practice upon the Royal Assent of the HE Freedom of Speech Bill.

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<p>duty to promote freedom of speech</p> <p>Those responsible: JI, AB, DI and CP and nominated faculty and service personnel (e.g Executive Officers)</p>			<p>procedures allow sufficient time to respond to risk with mitigation (i.e. actions and controls).</p> <ol style="list-style-type: none"> 3. The new Events and Speakers process now includes any High-Risk Events and Speakers or those applications in dispute to be taken to the Chair of the Ethics Committee as an independent arbiter. 4. The new policy and code have been cross referenced with the HE Freedom of Speech Bill which is at committee stage and still pending Royal Assent. 5. The code, guidelines and policy reinforce the following principles: <ul style="list-style-type: none"> ■ Stated core University values that encompass 'Social Justice', 'Inclusivity' and 'Transparency and Openness' ■ That the University welcomes contributions by visiting speakers and externally organised events in enriching the University's educational and social mission and deepening engagement with its communities and stakeholders ■ That the University is aware of its duty to provide a healthy and safe environment, and take account of legal obligations regarding activities that might incite violence, racial or religious hatred or a breach of the peace, or otherwise transgress the bounds of lawful speech ■ As per Section 43 of the Education (No 2) Act 1986, the University issues the Code with reasonable actions to ensure that any event takes place within the confines of the law. 	<ol style="list-style-type: none"> 2. The Safeguarding Manager to periodically remind nominated staff in each faculty and service to ensure that staff are reminded of their duty to complete the relevant events and speakers risk assessment process to enable student and staff safety, CT compliance and full accountability to the OfS for the annual ADR.
<p>G. Arrangements for ensuring effective welfare support systems, linking to external stakeholders as necessary (e.g. Police, NHS, voluntary agencies)</p> <p>Those responsible: DI, CP, SL</p>	A	LOW	<ol style="list-style-type: none"> 1. The Student Experience team focusses on a joined-up delivery of excellent student services and support across the Student Hub, Student Funding, Access Solent, Student Achievement and Mental Health and Therapy and Safeguarding. 2. As per the 2021-2022 action plan the Therapy and Mental Health Manager has implemented hybrid delivery of support to allow students to self-serve where appropriate e.g. self-referral to Therapy and Mental Health Services. 	<ol style="list-style-type: none"> 1. Continue to develop strategic and operational student services plans that ensure the ongoing delivery of excellent student services and support.

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			<ol style="list-style-type: none"> 3. The University led by the Deputy Head of Student Experience (Wellbeing) and the Therapy and Mental Health Manager are leading on the Mental Health Charter and its implementation. 4. The Student Hub and other support services will move to the Spark early 2023 with the aim of making services more accessible and collaborative. 5. The University meet regularly with local police and sit on the Southampton Prevent Board. The Student Experience team liaise with local organisations and bespoke training is provided on safeguarding themes; some training can be accessed without cost via the Safeguarding Adults Board 6. The University Inter-Faith Forum, chaired by the Deputy Head of Student Experience (Wellbeing) meets regularly. Membership includes Chaplains, Faith Advisers, and representatives from the SSU 7. Spirituality and Reflection facilities include a Quiet room, Prayer room and washing facilities promoted for use by all students. 8. Access Solent have trained key staff regarding students who are neuro-diverse to increase understanding of Autism and other matters such as ADHD (this is a group disproportionality being referred into Channel Panels nationwide). 9. The Student Hub also oversees the following: <ul style="list-style-type: none"> ■ Targeted support for vulnerable students at risk of leaving including care leavers and estranged students ■ Cause for Concern – to provide multi-disciplinary support for complex student cases 10. The Safeguarding Manager through the new safeguarding referral pathway and risk management processes can identify areas of risk and welfare matters which require multi-disciplinary or external wrap around support for students. 	<ol style="list-style-type: none"> 2. Periodically, review all relevant policies, procedures and other arrangements annually and on an as-needs basis. 3. Continue to work closely with local organisations to ensure a cohesive approach to shared problems and to ensure that the University is fully aware of emerging issues.

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<p>H. Policies for the use of IT (e.g. hardware, software, networks, social media) that respond to the Prevent duty.</p> <p>Those responsible: BC, DI, CP, LM and representative of P&D where required</p>	A	LOW	<ol style="list-style-type: none"> 1. The University's ICT policies state what is and is not acceptable use of University ICT facilities for both research and non-research purposes and outline the process for reporting any breach of ICT usage policies. They were updated in 2016 to specifically reference the University's statutory duty under section 26 of the Counterterrorism and Security Act 2015 (CTSA 2015). 2. ICT are represented on the Safeguarding Committee. 3. The University has web category/application filtering in place as a component of the University's current perimeter firewall solution. The web categories/applications we block are: command-and-control (can be used to aid identity theft or malware); dynamic-dns (can be used to aid identity theft or malware); grayware (can be used to aid spyware or malicious software); hacking (can be used to aid spyware or malicious software); high-risk (can be used to aid spyware or malicious software); malware (used to host spyware or malicious software); newly-registered-domain (can be used to aid identity theft); parked (can be used to aid identity theft); peer-to-peer (peer-to-peer file sharing applications); phishing (can be used to aid identity theft); proxy-avoidance-and-anonymizers (can be used to bypass security). There is a "Extremism" web filtering category which has been left on the default setting of "Allow (log access)". This setting has not been changed from the default setting because, although it doesn't get matched much, when it does match they have been false positive matches. Any web logs matching this category are reviewed on a periodic basis and any matches deemed to be true positive matches would be reported via the University's safeguarding procedure. 4. The Safeguarding Manager and Head of Technology Services have introduced a review mechanism to capture information monthly regarding any staff, students or third-party providers accessing inappropriate or extremist material using the University software or 	<ol style="list-style-type: none"> 1. Ensure that all arrangements (policies, procedures, and other practices) are reviewed regularly or on a as needed basis 2. P&D to support management of allegations against staff 3. The Solent University Contracts and Projects Manager Lesley McIvor to facilitate conversations with third party providers where inappropriate or extremist materials have been accessed using University ICT.

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			<p>Wi-Fi. To date this has resulted in two members of staff being spoken with and reminded of ICT processes and procedures for accessing this material for research purposes. One of those staff was a third-party provider and they were managed under the providers staff disciplinary processes.</p> <p>5. External Relations monitor social media for any evidence that a student or staff member is inciting hate rhetoric or terrorism and raise the alarm should any threat direct or indirect be aimed at the University.</p> <p>6. The policies and procedures regarding students and staff working on sensitive or extremism-related research are maintained by the research, innovation and Enterprise department (approved by the Research and Innovation Committee) and are published in the University's Academic Handbook e.g. the University Ethics policy.</p>	

Signed by:



Phil Cotton

Pro-Chancellor and Chair of the Board, Solent University

Date: 16 November 2022