



Prevent Policy

Document Management

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1. Introduction

1.1 Brunel University London is committed to supporting and responding to the needs of its staff and students. The University ensures a positive student and staff experience which assists staff and students to live, work and study as part of a safe Brunel community. The University seeks to maintain an enabling environment which is safe and conducive to teaching, learning and research, and the wellbeing of all.

2. Scope

2.1 Brunel understands its responsibilities under the Counter Terrorism and Security Act 2015 and fulfils its duty to have 'due regard to the need to prevent people being drawn into terrorism'.

2.2 In accordance with the obligation of the Act and the Revised Prevent duty guidance: for England and Wales¹, the University undertakes a Prevent Risk Assessment yearly and/or as required and reviews its Prevent Action Plan accordingly.

2.3 Brunel University London's Prevent Policy sets out how the University meets the Prevent duty as required under the Counter Terrorism and Security Act 2015 by outlining key aspects of the University's Prevent Action.

2.4 This policy is set out in the following three parts:

Part 1: Legal Context

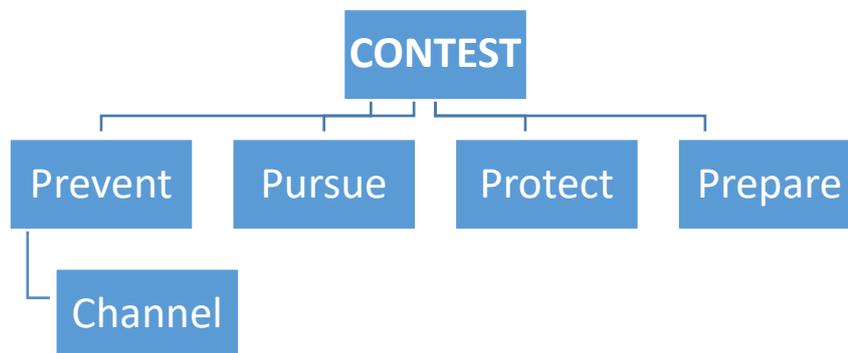
Part 2: Implementing the Prevent duty on Campus

Part 3: Procedure for raising a Prevent duty concern on Campus

¹<https://www.gov.uk/government/publications/prevent-duty-guidance>

Part 1: Legal Context

1. Prevent strategy



1.1 Prevent strategy is part of CONTEST, the national counter-terrorism strategy and aims to reduce the threat to the UK from terrorism by stopping people becoming terrorists or supporting terrorism.

1.2 The Prevent strategy:

- responds to the ideological challenge of terrorism and the threat from those who promote it;
- prevents people from being drawn into terrorism and make sure that they're given appropriate advice and support;
- works with sectors and institutions where there are risks of radicalisation that we need to address.

2. Prevent Duty

2.1 The Prevent duty applies to specified authorities in England, Wales, and Scotland. Higher Education Institutions are subject to the provisions that can be found in Schedule 6 to the Counter-Terrorism and Security Act 2015 (the Act).

2.2 As such, Section 26 of the Act places a duty on Brunel, to have “due regard to the need to prevent people from being drawn into terrorism”.

3. Channel Programme and Referrals

3.1 The Channel programme is a key part of the Prevent strategy. The programme focuses on providing support at an early stage to people who are identified as being vulnerable to being drawn into terrorism. It uses a multi-agency approach led by the local authority to protect vulnerable people by:

- a) identifying individuals at risk;
- b) assessing the nature and extent of that risk; and
- c) developing the most appropriate support plan for the individuals concerned.

3.2 Channel referrals are considered by the relevant local authority and relevant partners at a Channel Panel Meeting. A Channel Panel works to safeguard vulnerable individuals whilst promoting positive community cohesion.

3.3 When required, the University's Channel Panel is overseen by the London Borough of Hillingdon.

4. Balancing the Prevent duty and other legal duties and responsibilities at Brunel University London

4.1 The University takes into consideration relevant legal duties and responsibilities in its implementation of the Prevent duty. The requirements of the Prevent duty are considered against the following legal duties and responsibilities:

- a) Education Act 1986 sec.43;
- b) Education Reform Act 1988;
- c) Human Rights Act 1998;
- d) Data Protection 2018;
- e) Freedom of Information Act 2000;
- f) Public Order Act 1986;
- g) The Equality Act 2010, in particular the Public Sector Equality Duty;
- h) Health and Safety at Work Act 1974;
- i) Terrorism Act 2000/2008;
- j) Counter-Terrorism and Security Act 2015.

4.2 Where relevant, the University's Prevent Policy should be read alongside the following University policies:

- a) [Safeguarding Children and Vulnerable Groups - Policy and Guidance](#)
- b) [Extraordinary Support for Study](#)
- c) [Bullying and Harassment Policy](#)
- d) [Dignity at Work Policy](#)
- e) [Code of Practice on Free Speech and Events](#)
- f) [The University Data Protection Policy](#)
- g) [The University Freedom of Information \(FOI\) Policy](#)
- h) The University Equality and Diversity [Strategy](#) and [Policy](#)
- i) [University Complaint Procedure for students](#)
- j) [Health & Safety Policy \(Health & Safety at Brunel\)](#)

5. Governance

5.1 The University's Council has overall responsibility for the Prevent Duty. Council delegated its responsibility for fulfilling the duty to the University's Executive Board.

5.2 Brunel's Prevent Working Group, chaired by the University's Prevent Coordinator, oversees the implementation and review of the University's Prevent Action Plan as well as the review of the Prevent Risk Assessment.

5.3 In addition to this, the University's Prevent Coordinator and the Head of Security and Emergency Planning are tasked with assessing and mitigating any Prevent related risks yearly and/or as necessary.

6. Monitoring and Review

6.1 The Prevent Policy and associated documents are subject to periodic update and review when required. The University produces its Prevent Annual Report yearly and provides an annual Accountability and Data Return (ADR) to the Office for Students for compliance monitoring purposes.

6.2 Please contact the University's Prevent Coordinator via preventsafeguarding@brunel.ac.uk for queries about this policy and the associated documents.

Part 2: Implementing the Prevent duty on Campus

1. Prevent Action Plan

1.1 The Prevent Action Plan is a public document which sets out a series of activities which the University plans to undertake in order to comply with the Prevent duty. The Action Plan is reviewed and updated yearly.

1.2 A copy of the University's Prevent Action Plan is available [here](#).

2. Information sharing (Prevent)

External Information Sharing

2.1 Brunel University London has a Prevent Information Sharing Agreement with identified external partners for the purpose of complying with the Prevent duty.

2.2 The purpose of the Information Sharing Agreement is to ensure the lawful sharing of personal information as required under the Counter-Terrorism and Security Act 2015 and the Data Protection Act 2018.

2.3 Personal and/or other data (name and contact details as well as any relevant information related to the concern and purpose of the information sharing requirement) may be shared with identified partners, where that sharing is determined to be necessary and appropriate to address potential risks to the individual or the public.

2.4 The University Prevent Coordinator, in consultation with relevant member(s) of the University's set up for this purpose (including the University's Data Protection Officer), will determine whether personal and/or other data need to be shared with identified partners.

2.5 Wherever possible, the consent of the individual whose data is to be shared will be sought prior to the transfer of data unless, there are concerns relating to the University's Safeguarding duty as specified in the University's Safeguarding Children and Vulnerable Groups (Policy and Guidance) and/or where a student or staff member is at risk to themselves or others.

2.6 A copy of the University's Safeguarding Children and Vulnerable Groups (Policy and Guidance) is available [here](#).

2.7 A record of each shared event, to include the date, the name of the organisation with which the data have been shared, and details of the transaction, will be securely retained by the University Prevent Coordinator for one year after the date on which the information was shared.

2.8 Only the University's Prevent Coordinator or his/her nominee can share personal data with the University's identified external partners for the purpose of complying with the Prevent duty

2.9 The University's external information sharing partners for the purpose of complying with the Prevent duty are

- a) London Borough of Hillingdon

- b) HE/FE Regional Prevent Coordinator(s);
- c) Metropolitan Police Service;
- d) Local Channel Panel
- e) Brunel Pathway College (BPC)

2.10 The University liaises with the Union of Brunel Students as appropriate on matters relevant to Prevent although they are not a formal information sharing partner in this respect.

Copies of the **INFORMATION SHARING AGREEMENT (EXTERNAL)** are available on request

Internal Information Sharing

2.11 Internally, personal data should only be shared within Departments and/or Colleges at the University for good business reasons and/or where a student or staff member is at risk to themselves or others. In order to comply with the Prevent duty and the rules relating to Data Protection, the University has an Internal Information Sharing Protocol for Prevent related matters.

2.12 The University's Internal Information Sharing Protocol sets out to all staff the University's parameters for sharing of personal information or other information as required by the Counter-Terrorism and Security Act 2015, where the sharing of personal information is necessary to provide advice and support to individuals who may be at risk of being drawn into extremism or terrorism.

Copies of the **INFORMATION SHARING AGREEMENT (INTERNAL)** are available on request

3. Information Technology and Filtering

3.1 Brunel University London acknowledges the right of staff and students to have the freedom to pursue a wide range of academic activities.

3.2 Brunel Acceptable Computer Use Policy, Network Account Policy and the Electronic Mail Policy outline the arrangements for the use of the University's computer facilities including consideration of filtering arrangements and of academic activities that might require online access to sensitive or extremism-related material. Section 2.10 of the **Brunel Acceptable Computer User Policy** covers inter alia details of compliance with the Counter-terrorism and Security Act 2015. Staff and students are encouraged to familiarise themselves with these policies.

3.3 The University's uses **Websense** web filter and security blocks for the main campus network and for all University owned computer hardware. The filters and security blocks are not applied to personal devices. However, the University actively monitors access to sites on its network. There is a complete block on all networks applied to internet sites where security or emerging threat categories are identified.

3.4 Where students or staff members access sites that breach the University's Acceptable Computer Use Policy, consideration will be given to having these facilities withdrawn and, if necessary, reported to the appropriate authorities. The University

will keep this matter under close review but retain the current monitoring arrangements.

4. Events and External Speakers

4.1 Brunel takes care to uphold its duty to ensure freedom of speech (within the law) on campus and its arrangements to protect the importance of academic freedom. In accordance with **Section 13 of the University's Charter, 'Freedom of Speech and Fair and Equal Treatment'** the University is committed to the fair and equal treatment of every person and shall not discriminate on unjustified, irrelevant or unlawful grounds."

4.2 The University also takes care to ensure that its facilities and /or brand are not used in a way that might run the risk of harming persons at the University, used to promote violent extreme views, provide a platform for a proscribed terrorist organisation or to facilitate other criminal or public order offences.

4.3 The University's [Code of Practice on Free Speech and Events](#) sets out the responsibilities of the University and those of the event organisers (internal or external) when planning an event on Campus or a University branded event off campus. It further sets out the University's procedures when arranging meetings and other activities on the University's premises which might be deemed controversial by the nature of the speakers present or by the views which might be expected to be expressed.

4.4 In order to promote balanced and respectful debate the University will consider any of the following in order to mitigate any potential risk to the University:

- a) having an independent chairperson to facilitate an event and make sure a range of viewpoints can be heard;
- b) filming events to deter the use of unlawful speech;
- c) putting additional security in place;
- d) ticketing an event to prevent non-student violent protest;
- e) reviewing any promotional materials before the event; or
- f) training staff on how to facilitate well-balanced debate.

4.4 Permission to use University premises for events will only be granted to staff, students and third parties who undertake to comply with instructions issued by the University in relation to the location, arrangements for and conduct of such activities, including adequate stewarding and control of entry. The details of such arrangements are agreed in each individual case.

4.5 Staff and students responsible for infringements of or departures from these procedures may be subject to University disciplinary procedures. Third parties responsible for infringements of or departures from these procedures may be barred from using the University's facilities.

4.6 Student Union's Student Clubs and Societies must follow the agreed protocol when using the University's brand for off-site events. All publicity using the University's name must be agreed by the Chief Governance Officer prior to its publication. No

events shall be booked off campus in the University's name where an external speaker is present without the consent of the Chief Governance Officer.

4.7 Staff members must also follow the agreed protocol when using the University's brand for off-site events. All publicity using the University's name must be agreed by the Chief Governance Officer prior to its publication. No events shall be booked off campus in the University's name where an external speaker is present without the consent of the Chief Governance Officer.

4.8 Events booked through the Meeting House and other faith spaces within the University are subject to the University's [Code of Practice on Free Speech and Events \(brunel.ac.uk\)](https://www.brunel.ac.uk). Requests for external speakers will need to be submitted to the University for approval by completion of the University's [External Speaker Form](#).

5. Freedom of Speech

5.1 Brunel has procedures relating to meetings and other activities on its premises which might be deemed controversial by the nature of the speakers present or by the views which might be expected to be expressed. These are set out in the [Code of Practice on Free Speech and Events \(brunel.ac.uk\)](https://www.brunel.ac.uk).

5.2 The University defines 'Controversial' to mean a meeting or other activity where there is a real possibility that the speaker may not be able to enter or leave the building safely and/or deliver a speech properly unless special arrangements are made.

5.3 If any doubt exists about whether the [Code of Practice on Free Speech and Events \(brunel.ac.uk\)](https://www.brunel.ac.uk) applies to meetings or other activities, organisers should consult the Chief Governance Officer in good time. The final judgement of those matters is vested in the Chief Governance Officer.

5.4 Appeals against the ruling of the Chief Governance Officer may be made to a special committee comprising at least one member of Council and one member of the Executive Board. If there is insufficient time to consider the appeal before the scheduled date for the Event, the Event may have to be postponed pending the outcome of the appeal.

5.5 Requests involving speakers from outside the University must be made as far as possible in advance of the projected Event date, and in any case no less than ten (10) working days in advance. Requests from Staff for an External Speaker should be made to the University by completing the University's [External Speaker Form and sending it to \[legalservices@brunel.ac.uk\]\(mailto:legalservices@brunel.ac.uk\)](#). Further information about planning and hosting an event can be found in the [Events toolkit \(brunel.ac.uk\)](#).

5.6 Requests made by students involving speakers from outside the University may be submitted to student.activities@brunel.ac.uk using the [External Speaker Form](#). However, it is still expected that the University's [Code of Practice on Free Speech and Events \(brunel.ac.uk\)](https://www.brunel.ac.uk) will be adhered to.

5.7 Requests for an external speaker from an external third parties should be submitted to legalservices@brunel.ac.uk and conference@brunel.ac.uk.

5.8 A copy of the Code of Practice on Free Speech and Events is available [here](#). Further information about planning and hosting an event can be found in the [Events toolkit \(brunel.ac.uk\)](#).

6. Academic Freedom and Sensitive Research

6.1 Brunel recognises that academic staff at the University have freedom within the law both to question and test received wisdom and to put forward new ideas and controversial or unpopular opinions without placing themselves at risk of losing their jobs or privileges. It is further recognised that the research and study of terrorism is valid and valuable, and that staff and students should be able to undertake this without risk of prejudice. It is therefore acknowledged that certain staff (and exceptionally students) will have need to access material which supports terrorism as part of their work. In such cases it is incumbent on the responsible member of academic staff to ensure via the University's normal ethical review processes that material is only accessed that is appropriate for the research or other work being carried out and that its use will not encourage terrorism in any way. This may include the use of an electronic and / or physical 'safe room' (as is already required by some funders for some security-sensitive research). For the protection of the individual and the University, we now require any individual who needs to access such material to register this in advance with the Chief Governance Officer.

6.2 Details of visiting lecturers should be made available to and approved by the Chief Governance Officer or nominee.

7. Welfare and Prevent-related safeguarding support

7.1 Welfare and Prevent-related safeguarding support is available to students in a variety of ways. [Student Services](#) at Brunel provide non-academic support and guidance to our students from enrolment to graduation. This includes counselling, welfare and wellbeing, disability support, money matters, and international student advice. Concerns about a student's welfare can be confidentially (and anonymously) reported via the University's [Report & Support portal](#) or by email to studentsupport@brunel.ac.uk. All students have a personal tutor and those in University residences will also have access to residential support. The Students' Union provides welfare support through its [Union Advice Service](#).

8 Faith Facilities

8.1 The University seeks to ensure that appropriate provision is made for those of any faith (or those without faith) to access appropriate facilities for pastoral care and for religious purposes. We provide a Chaplaincy and a Muslim prayer room as well as prayer facilities for students, staff and visitors whilst on campus in the Isambard Complex or the Meeting House. Various Students' Union faith societies exist and

rooms are available to be booked (subject to normal timetabling constraints) for faith-related purposes.

8.2 The University's Student Services Department has established processes for the management of faith facilities within the University.

9. Prevent Training

Staff

9.1 Brunel's Prevent Training Plan requires all relevant staff to undertake the Prevent Duty training as appropriate to their role.

9.2 The aim of the briefing session is to raise awareness of the Prevent duty and the University's pathway for reporting Prevent duty concerns. The session informs staff members of the University's Prevent duty and Prevent reporting procedure.

9.3 Staff members are required to have a refresher every 3 years.

Students

9.4 Where relevant, Brunel students who undertake a placement as part of their programme of study may be required to undertake Prevent training before their placement commences. Students who undertake a placement with one of the highlighted 'specified authorities' listed below, will need to undertake such training.

- a) Local Authorities;
- b) Schools;
- c) Further Education Institutions;
- d) Higher Education Institution;
- e) The Health Sector;
- f) Prisons and Probation Services;
- g) The Police.

10. Student Complaints

10. The University welcomes the views of its students. It recognises however that there may be occasions when a student is dissatisfied with an aspect of their experience at the University.

10.2 Students are encouraged to raise issues informally with administrative or academic staff within their Department, for example, with their Tutor. Departmental Senior Tutors have responsibility for pastoral issues within the Department and can be approached concerning most matters. Each College also has an Associate Dean (Student Experience) who can be approached about any concerns.

10.3 Students who wish to make a formal complaint about a Prevent related matter should seek to do so in accordance with the University Complaints Procedure.

For more information on University's Student Complaints Procedure please visit [Student Complaints](#)

Students may also want to contact the Advice and Representation Centre in the Student Union for on-going advice and support at any stage of their complaint. For more information visit [Union Advice Service](#)

11. Staff Grievance

11.1 The University recognises that, from time to time, an individual may wish to seek to remedy any work issue, complaint or grievance that they have while employed by the University.

11.2 The Staff Grievance Policy can be used to resolve a variety of issues, concerns, problems or complaints that may give rise to a work-related grievance. These may include, but are not restricted to, grievances raised about the application and interpretation of terms and conditions of employment, health and safety, working relationships, working practices and equal opportunities.

10.3 Members of staff who wish to raise a formal grievance in relation to a Prevent related matter should seek to do so in accordance with the University Staff Grievance Policy.

Part 3: Procedure for raising a Prevent duty concern on Campus

1. General Concerns

1.1 In trying to balance the need to protect personal data and the sensitive nature of Prevent, Brunel University London has a streamlined pathway for reporting Prevent concerns.

1.2 The Prevent Coordinator is responsible for the operational management of casework which may arise as a result of the Prevent duty. This includes managing and coordinating relevant welfare and academic support services internally as well as external welfare support (e.g. local authority services, NHS and / or various charities) and / or Channel referrals. The Prevent Coordinator works with the University's Head of Security & Emergency Planning where Prevent-related safeguarding concerns are raised and together they make up the 'Prevent Team'.

1.3 When a Prevent duty concern is raised, it is important that such a concern is shared in a safe and supportive manner to enable the concern to be effectively assessed for the appropriate intervention to be put in place. Concerns can be raised with the Prevent Coordinator by reporting it via the [Report & Support portal](#) or by emailing: studentsupport@brunel.ac.uk. Where a Prevent-related safeguarding concern is raised, the Prevent Coordinator will take steps to ensure the concern is recorded on the University's APEX System.

1.4 Where a student, staff member or third party is concerned that a student is expressing violent extremist views or is at risk of being drawn into terrorism, these concerns should be passed to the University's Prevent Coordinator who will ensure it is recorded on the University's APEX System. The Prevent Coordinator will work with the Head of Security & Emergency Planning to carry out an initial 'Prevent Incident

Assessment' seeking to gather substantive information and evidence which would allow for full consideration of the case.

1.5 Once any available information and substantive evidence has been gathered, the Prevent Coordinator will consider the material in discussion with the Head of Security & Emergency Planning and other relevant members of staff.. A decision will be made as to the seriousness of the case and four potential outcomes are likely at this stage:

- a) Concern is **NOT RELEVANT** to Prevent but may be relevant to another University policy. In such a case, a referral will be made to the appropriate policy / process. For example, [Student Disciplinary Procedure](#), [Professional Suitability Procedure](#), [Extraordinary Support for Study Procedure](#).
- b) Concern is **RELEVANT** to Prevent but not serious enough for a Channel Referral. In such a case, prevent related welfare action(s) will be put in place such as case specific internal welfare / academic arrangements – counselling or mental health referral, medical referral, chaplaincy referral etc.;
- c) Concern is **RELEVANT** to Prevent and the case is serious enough to be **referred to the local Channel Panel by the Prevent Coordinator**;
- d) **NO CONCERN and EXIT**. No further action is needed.

1.6 In reaching a decision to share any information with third parties the University will comply with the requirement of the Data Protection Act and abide by its external Prevent Information Sharing Agreement. Internally, personal data can only be shared within the University for good business reasons.

1.7 The University's APEX System will be used to record Prevent-related safeguarding concerns and the action taken in respect of the concern.

2. Extraordinary Support for Study

2.1 There may be instances where a student's health or wellbeing may cause the University concern regarding the student's ability to study effectively.. This may arise where, for example, the University is concerned that a student poses a risk to his/her own health, safety and/or wellbeing and/or that of other persons.

2.2 In responding to and managing situations where a student's ability to study effectively is a concern, the University remains mindful of its duty of care and of its obligations under the Equality Act 2010, including in appropriate cases its duty to anticipate the needs of disabled individuals and make reasonable adjustments. Where this occurs, the University may seek to manage the situation in accordance with [Senate Regulation 11: Extraordinary Support for Study](#).

2.3 Where there is a need to implement Senate Regulation 11, the University will work with the student concerned in a spirit of support and cooperation and will seek to reach a mutually agreeable outcome wherever possible. Each matter will be dealt with on the basis of its individual circumstances. Any decision reached about a student's ability to study effectively, including those relating to Prevent related safeguarding

concerns, will be made wherever possible through an inclusive process involving the student and other relevant individuals such as the University's Prevent Coordinator, along with College or Department staff, health care professionals and University Services. .

2.4 The University will ensure that it offers necessary support and encourages students to seek appropriate support from the outset, for example by signposting students to internal sources of support or to external support such as via the Channel process, their local GP or health care professional.

2.5 Students being taken through [Senate Regulation 11: Extraordinary Support for Study](#) will be entitled to be accompanied and/or represented at any stage by a staff member, friend, relative, representative from the [Union Advice Service](#) or health care professional, disability support worker or advocate.

2.6 Students returning to study after a period of absence arising from their ability to study effectively as a result of a Prevent related safeguarding concern should note that a return to study will be dependent upon the student satisfying the Head of Student Services in accordance with [Senate Regulation 11: Extraordinary Support for Study](#) that they are able to study effectively and satisfying any conditions attached to their return. The Head of Student Services, in consultation with the Prevent Coordinator may reasonably require the student to produce satisfactory medical and/or other evidence of their ability to study effectively (for example from the University Occupational Health Physician, psychiatrist, GP or mental health support worker).

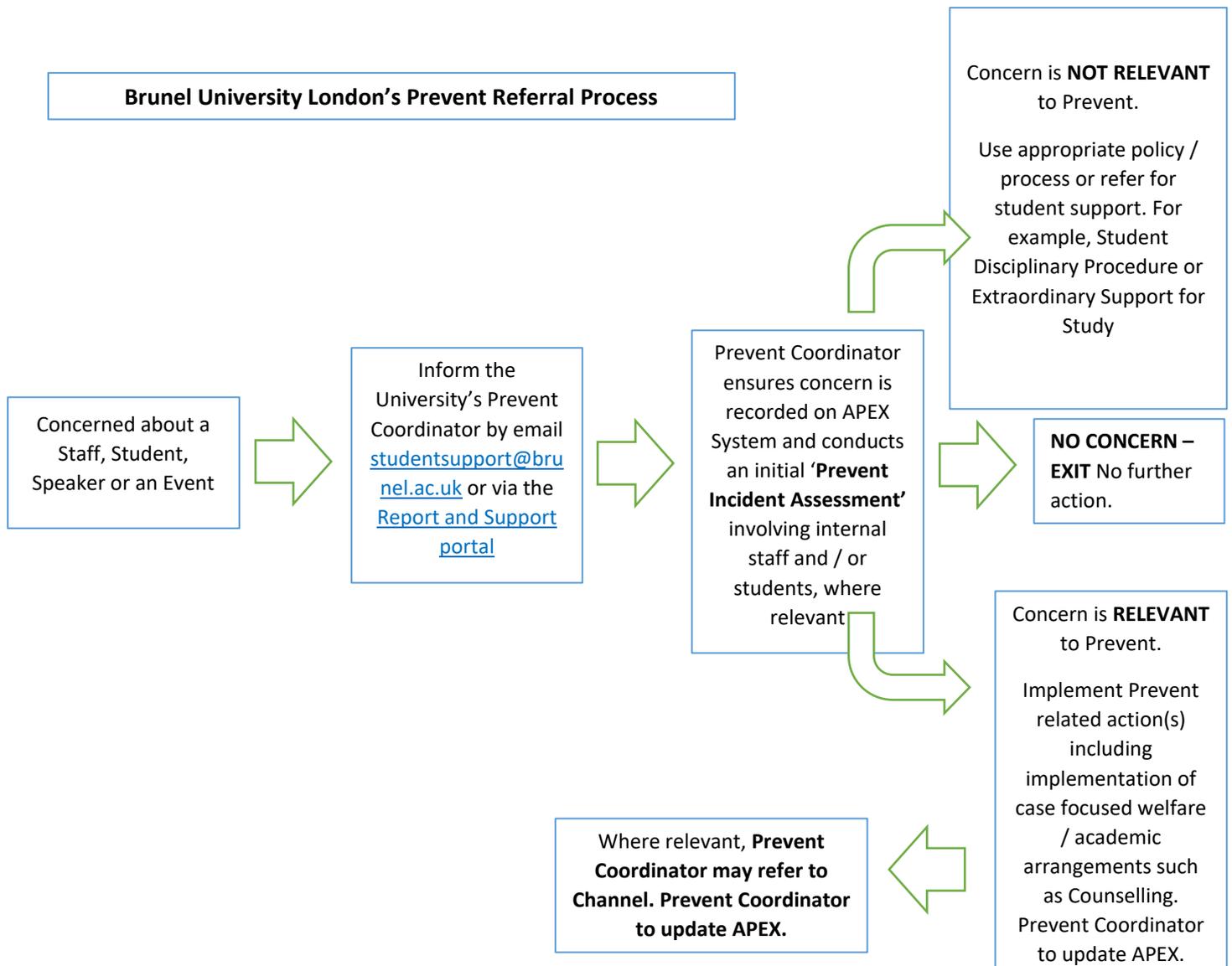
2.7 Therefore, students should notify the Head of Student Services in writing of any request to return to study. The particular process to be followed in dealing with a request by a student to return to study under Senate Regulation 11 will be at the discretion of the Head of Student Services and will depend upon the circumstances of the matter (for example, the seriousness of the student's health problem and the extent of any risk posed). However, the Head of Student Services will normally invite the student to meet with them to discuss the matter in person.

2.8 The decision to permit a return to study where the student had been subject to Prevent related safeguarding issues, will be made by the Head of Student Services in consultation with the Prevent Coordinator and other relevant staff and/or external professionals. In making a decision, the Head of Student Services and the Prevent Coordinator will consider whether the student is able to effectively study and whether they have complied with any conditions previously imposed on any return to study and with any relevant academic regulations.

2.9 The Head of Student Services will be responsible for ensuring that arrangements are put in place for providing support identified for a student returning to study and for that support to be reviewed at such intervals as is appropriate in the circumstances. The decision, with reason, will be sent to the student in writing normally within 14 working days of the student's written request to return to study.

Prevent Referral Flow Chart

Please refer to the flowchart below for the University's Prevent Referral Process



Staff and students are not expected to decide whether there is a genuine risk or to challenge the individual about their concerns. What is important is to refer any concerns under this process. Please contact the Prevent Coordinator (by emailing studentsupport@brunel.ac.uk or report in confidence via the [Report and Support portal](#) if you have any concerns.