UNION SCHOOL OF THEOLOGY PREVENT POLICY

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1. INTRODUCTION

1.1 Purpose

This policy is designed to help all staff, Lead Mentors, students, hirers of premises and visitors to understand Union School of Theology's Prevent Duty, what to do if they think someone is at risk of being drawn into terrorism, and who to contact if they are worried or unsure about someone or something that has happened.

Union School of Theology is required under the Counter-Terrorism and Security Act 2015 to 'have due regard to the need to prevent people from being drawn into terrorism'. Under section 29, it must have regard to guidance issued by the Home Secretary. The *Prevent Duty Guidance for higher education institutions in England and Wales* came into effect on 18 September 2015 following approval by Parliament. This is known as the 'Prevent Duty'. The obligations of the School under the Prevent Duty are separate from those already imposed by sections 19 and 38B of the Terrorism Act 2000, which, in summary, require people to report to the Police:

1.1.1 Any suspicion or belief that a person has committed a terrorist offence, where such suspicion or belief has been obtained in the course of a trade, business or employment; or

1.1.2 Information which might be of material assistance in preventing the commission or an act of terrorism or apprehending an offender. It should be noted that failure to make such a report is in itself a criminal offence.

1.2 Union School of Theology is committed to ensuring a safe and secure environment for all those who live, work, and study on our premises and those who visit or hire our premises. Union School of Theology is committed to meet its obligations under the Prevent Duty to ensure that vulnerable individuals are safeguarded from being drawn into terrorism on our premises.

1.3 Union School of Theology has taken a risk-based approach to put appropriate measures in place to ensure that the risks of all those covered by

the scope of this policy listed in 1.4 below being radicalised are minimised. At the same time it balances its other legal duties, including those of ensuring freedom of speech and academic freedom within the law and promoting equality and diversity. This policy forms part of that approach.

1.4 In fulfilling its Prevent Duty, UST will work in partnership with the DfE regional Prevent Team, and the HEFCW Prevent Team.

1.5 The UST Prevent Co-ordinator is the Academic Registrar and can be contacted at
academicregistrar@ust.ac.uk

1.6 Prevent is a regular item on the agenda of meetings of the Union School of Theology Senior Management Team, which comprises the President, the Provost and the Executive Director. Prevent matters are also discussed by regular meetings of the Prevent Team, comprising the Executive Director, the Provost, the ICT and Network Administrator, the Prevent Co-ordinator and one of UST's Safeguarding Officers.

1.7 Scope

The policy applies to all members of the UST community, including –

- **1.7.1** Staff, including permanent and part-time, paid and unpaid, visiting lecturers, volunteers, others engaged to do work for the School (referred to in this document as staff);
- **1.7.2** Lead Mentors in UST's Learning Communities (referred to in this document as Lead Mentors), all of whom must sign the Learning Community MOU confirming their agreement with this policy as part of their agreement to adopt all UST's Policies and Procedures as part of their work for UST.
- **1.7.3** All students including their family members resident on or visiting the UST campus (referred in this document as 'students').
- **1.7.4** Those who hire the UST premises in Bridgend and Oxford and those who attend the meetings and conferences they run on the premises (referred to in this document as hirers).

1.7.5 All visitors to the School, including prospective applicants (student and staff), those staying on the School premises for any other purpose, referred to hereafter as 'visitors.'

2. DEFINITIONS:

2.1 **Terrorism:** For the purposes of this policy, the statutory definition of "terrorism" should be applied where that term is used. That definition is taken from the Terrorism Act 2000, which 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."

2.2 **Extremism:** The statutory Prevent Duty Guidance defines "extremism" 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 and calls for the death of members of our armed forces, whether in this country or overseas." Where the term "extremism" is used in this policy, it should be read and understood in the context of this definition.

3. POLICY

3.1 Affirmations

3.1.1 The School welcomes the Government's intention that the Prevent Duty is implemented 'in a proportionate and risk-based way' and that it should not create large new burdens on institutions. We therefore intend to implement our legal responsibilities as part of our existing policies and procedures, which we also consider to be the best way of ensuring a joined-up approach. In doing

this we will actively involve the Student Committee and will continue to consult them should any changes to this policy be required in the future.

3.1.2 We take seriously our responsibility to ensure the safety and wellbeing of students, staff, volunteers and visitors, and will work to prevent any member of the School community from being drawn into terrorism. We also value the principles of academic freedom and general freedom of expression and have a statutory duty to protect them.

3.1.3 This Union School of Theology policy, and any amendments, is owned and approved by the UST Academic Board. It is affirmed by the UST Board of Trustees, and its Senior Management Team (President, Provost, and Executive Director).

3.2. Leadership

3.2.1 The School takes seriously at the highest levels the need to prevent terrorism occurring in our community. Prevent Duty is a standing item in the Senior Management Team's regular meetings. The Prevent Co-ordinator will report to them any activity that causes concern, and the Senior Management Team will discuss the action needed to mitigate the risk reoccurring, and whether the Risk Assessment should be amended in the light of reported events. Prevent Duty will appear in the report from the School of Theology to the Board of Trustees. The Board of Trustees will monitor whether the Risk assessment is appropriate.

3.3 Training

3.3.1 All members of Union School of Theology staff and Lead Mentors of Learning Communities will made be aware of the School's responsibilities under the UK government's Prevent Duty and of the measures set out above to comply with it.

3.3.2 UST will normally hold annual training and information-sharing events for all staff, volunteers, and Lead Mentors so that they can recognise those who are vulnerable of being drawn into terrorism and potential signs of

radicalisation, and understand the appropriate responses expected. This training will be arranged by the Prevent Co-ordinator in consultation with the Provost, and a training plan will be submitted annually to HEFCW as part of its annual Prevent monitoring report. UST will ensure that Prevent Duty training (WRAP, Channel, or Other) for staff and volunteers is suitable to their role, and that up to date information about Prevent responsibilities is given to those who hire the UST premises. This training and information sharing will be held for members on campus, and for Lead Mentors during the annual Union Conference, which they are required to attend on the campus. These sessions will be recorded and can be accessed by those who take up their roles after the training event has been held.

3.3.4 The Academic Registrar has been identified as the member of staff responsible for ensuring that the School complies appropriately with the Prevent Duty and regularly attends training days. The Academic Registrar works in liaison with the DfE regional Prevent coordinator and other key stakeholders within and beyond the School. An annual report will be made to HEFCW.

3.3.5 Regular Prevent awareness training will be made available to students, through the DfE Prevent Co-ordinator.

3.3.6 UST will make information about Prevent and the School's policy available on the UST website and the staff and student pages of the VLE, and the Lead Mentor pages of the VLE.

3.4 Risk Assessment and Action Plan

3.4.1 As part of its Prevent Duty, UST will carry out an annual assessment of the risk of anyone at the UST campus, Oxford office or UST Learning Communities, becoming radicalised. The Prevent Policy will be reviewed at least annually. Where any significant risk is identified we will consider what action might mitigate the impact/ likelihood of that risk crystallising, and if necessary include it in the School's Prevent Action Plan. Proposed or actual acts of violence will be treated in accordance with the UST Code of Conduct, and the appropriate authorities informed. If concerns are raised about someone being

drawn into ideologies that advocate the use of violence, the Prevent Co-ordinator will seek advice from the DfE regional Prevent coordinator and the Wales Extremism and Counter Terrorism Unit (WECTU).

4 External Speakers

4.1 In complying with the Prevent Duty the School will not provide a platform for any proscribed terrorist organisation or encourage terrorism in any way.

4.2 All visiting speakers must be approved by the Provost or the Executive Director before they are permitted to speak to any section of the UST community.

4.3 Organisations which use or hire the Union School of Theology premises should submit in advance a list of any intended speakers at events they hold, and details of their backgrounds and chosen topics. The UST premises are only hired out by a very small number of users who are well-known to UST. UST will not hire out its premises to any person or group who will allow the unlawful expression of views, especially those who might incite those attending to commit a criminal act.

4.4 Union School of Theology will not suppress legitimate freedom of thought and expression. However, the School takes seriously its duty to ensure, wherever practical, that such thoughts and expressions do not constitute incitement to riot, insurrection, racial hatred, religious hatred, sexual harassment or other activities (beyond the right of peaceful protest) which are likely to cause a breach of the peace or public disorder or otherwise to be unlawful.

4.5 Any event held in UST's name off-campus will require the permission of the Senior Management Team (President, Provost, Executive Director), and will operate under the provisos of UST's Policies and Procedures including its Prevent Policy.

5. IT Networks

5.1 We consider it unacceptable for our IT networks to be used in any way that supports, promotes or facilitates terrorism. Student induction will highlight this policy. Prevent is referenced in our 'Acceptable Use of the Internet' Policy

and will maintain filters (such as Guardian) as a means of restricting access to content covered by the Prevent Duty as part of our risk assessment process. The ICT Network Administrator monitors student use of the Internet. Social media services such as Facebook, Twitter and Reddit provide new avenues for the distribution and accessing of extremist material, and the School takes the challenges presented by social media very seriously. If any misuse of social media accounts is discovered, then action will be taken in accordance with the ICT policy and the Student Code of Conduct. In the light of any concerns the Prevent Co-ordinator will seek advice from the DfE regional Prevent coordinator and WECTU and Jisc.

6 Communications

6.1 We will not permit material supporting terrorism, violent extremism and radicalisation to be displayed within School premises and will remove any such material if it is found. Likewise, we will seek to ensure that the School's printed and electronic communications (including its website) do not contain or support terrorist material or material likely to encourage terrorism and will investigate immediately if any such instances are raised.

7. Security-Sensitive Research

7.1 The School recognises that the research and study of terrorism may be 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) may 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 School'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. All such work should be approved in line with the UST Research Ethics Policy.

7.2 It is acknowledged that there may be legitimate reason to display materials relating to terrorism as part of legitimate teaching and research activities, and

this should be declared to the relevant Programme Leader and the Prevent Co-ordinator before such teaching takes place.

8. Pastoral Support

8.1 UST's campus community and its learning communities are small bodies where staff, students and Lead Mentors are well known to each other. Every student has a Personal Tutor and meets weekly in a Personal Tutor Group. The UST Learning Communities meet together each week, each led by a Lead Mentor. The school also has a Welfare Officer who is a trained counsellor. Students are encouraged to contact relevant staff members regarding pastoral issues.

8.2 As a Christian School of Theology pastoral care is embedded in our approach and there is no chaplaincy. A lead in this is taken by our Pastoral Dean under the direction of the Provost. Most of the School's lecturers are ordained, so further additional chaplaincy support is not needed.

8.3 All faith-related activities at Union School of Theology are community events at which staff and students use facilities collectively, and content is monitored for its appropriateness.

8.4 Although UST is a Christian theological institution, our students learn about other faiths as part of their programmes of study.

8.5 The School works closely with the Student Committee in ensuring that we provide excellent care and support to our students. Students will have regular access to the Prevent training being provided by the School.

9. UNDERSTANDING THE RISKS OF RADICALISATION

There is no single way to identify who is likely to be vulnerable to being drawn into terrorism. However, the following indicators have been identified:

9.1 CONTEXTS

9.1.1 Personal circumstances can lead to someone becoming vulnerable to extremist ideology that could lead to their radicalisation. These include:

9.1.2 Living in a conflict/war zone and/or observing acts of injustice can engender feelings of loss, grievance, insecurity, vulnerability and helplessness. Such people can be very vulnerable to indoctrination and radicalisation.

9.1.3 Experiencing loss of family members or witnessing perceived or actual injustice to someone personally known, particularly if separated from family members can also lead to vulnerability to indoctrination and radicalisation.

9.1.4 A need for identity, meaning and belonging: particularly after experiencing peer, social, family or faith group rejection or isolation

9.1.5 Relevant mental health issues: Disorders such as anxiety, depression, PTSD and relational or personality problems can leave individuals particularly susceptible to radicalisation

9.1.6 A desire for excitement and adventure: Young people in particular are often influenced by views and opinions provided by online propaganda

9.1.7 A need to dominate others

9.1.8 Susceptibility to indoctrination

9.1.9 Dependence on relationships built on social media: vulnerability to those who have built a trusting relationship either in real life or on social media.

9.1.10 Being at a transitional time of life: e.g. moving to a new area or country, ending or starting a new relationship etc

9.1.11 Being influenced or controlled by a group: organisations intent on radicalising others who have a powerful and dominating effect on individuals

9.1.12 Opportunistic Involvement: people may be presented unexpectedly with an opportunity to become involved with groups or individuals they may not otherwise associate with. They may be taken by surprise by 'psychological hooks' that quickly take hold.

9.1.13 A desire for political or moral change: Some people could react strongly to the emotive subject of extremism and terrorism, often with disgust or outrage in some cases, this can lead to an overwhelming need for change, either political or more extreme.

9.2 INDICATORS OF RISK

the following symptoms **may** be expressed by someone who is at risk of radicalisation, however they may not express any of these symptoms and this list is not exhaustive:

9.2.1 Evidence of withdrawing or isolating themselves from others and/or being secretive;

9.2.2 Extreme moods (this could expressive itself in being either very quiet or withdrawn or very angry).

9.2.3 Third party reports of concerns about behaviour e.g. Plans to undertake extended periods of travel to international locations known to be associated with terrorism

9.2.4 Exclusion of certain groups or individuals from activities which appears to be for extremist or discriminatory reasons

9.2.5 Direct disclosure from the individual of vulnerability to being drawn into terrorism or extremism

9.2.6 Evidence of friends or family concern about vulnerability to extremism

9.2.7 Evidence of discriminatory treatment of other groups or individuals

9.2.8 Evidence of non-compliance with normal expectations of behaviour or shared values within our society, in the context of the definition of "extremism"

9.2.9 Possessing, accessing or requesting extremist materials, unless authorised to do so for academic study through the usual Research Ethics process

9.2.10 Expression of extremist views and sharing of extremist materials including on social media

9.2.11 Use of extremist language; expressing openness to violent solutions to world problems

9.2.12 Threats of violence

9.2.13 Inviting visitors to the school grounds who are a cause for concern in the context of this policy or attempting to distribute material promoting extremism.

10 RAISING AND REPORTING A CONCERN

(see chart 'UST INFORMATION SHARING PROCEDURE FOR PREVENT-RELATED CONCERNS)

10.1 Any staff, student, volunteer, hirer, or visitor to the UST Campus, Oxford office or a UST Learning Community may identify concerns about an individual potentially being drawn into violent extremism or terrorism based on information received or behaviour observed.

10.2 Any member of the School community who is concerned about a student or staff member being at risk of being drawn into terrorism should report this immediately.

10.3 If there is a threat to life and someone believes an individual to be in serious, immediate, danger they should call the police emergency service on 999. They should also tell the Prevent Co-ordinator.

10.4 Anyone who has a Prevent-duty concern about a person in the School Community should initially discuss this concern with the Prevent Co-ordinator. Students or Lead Mentors in Learning Communities should report any such concerns to their Lead Mentor, who will report them to the Prevent Co-ordinator.

10.5 It is important for staff, students, volunteers or visitors to realise that it is not their responsibility to determine 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 to the person who can deal with the situation in an informed manner.

10.6 In consultation with the Prevent Team (Provost, Executive Director, ICT Co-ordinator) the Prevent Co-ordinator will decide on the appropriate course of action.

10.7 Depending on the nature or seriousness of the concern, the action taken could include any or all of the following:

A discussion with the student's personal tutor or a staff member's line manager;

A phone call to the DfE Prevent contact or WECTU to seek advice

A phone call to HEFCW to seek advice such as in the case of a potentially serious Prevent-related issue; [see The Prevent Duty: Monitoring Framework for Higher Education Providers in Wales, Appendix D https://www.hefcw.ac.uk/]

Should the concern be found to be justified, these external bodies will advise on any action to be taken.

The aim is always to support the individual, to understand what is drawing them towards ideologies that promote violence and to offer suitable intervention measures.

UST will also make use of the Channel referral process when it considers it is necessary and appropriate to do so in the interests of preventing people from being drawn into terrorism and to enable them to access appropriate help.

11. ACTION IN THE EVENT OF A SPEAKER CAUSING A PREVENT DUTY CONCERN

a. The Prevent Co-ordinator should be informed.

b. In consultation with the Prevent Team (Provost, Executive Director, Resources Manager and the relevant Programme Director) the Prevent Co-ordinator will decide on the appropriate course of action

c. If the concern is considered to have basis, the Prevent Co-ordinator will contact the DfE Prevent contact and WECTU.

d. If an offence is deemed to have been committed, the external bodies will advise on any further action necessary.

12. RECORDING OF REPORTED CONCERNS

a. Whatever the concern, the Prevent Co-ordinator will complete the Prevent Duty Reporting Form without naming the individual.

b. Prevent Duty will be a standing item on the Senior Management Team's regular meetings. Any activity will be reported, and the team will discuss what action might be put in place to mitigate the risk reoccurring.

c. Prevent Duty will appear on the regular report from the School to the Board of Trustees. The Board will monitor whether the Risk Assessment should be amended in the light of any events that may have been reported since their last meeting.

12.1 Should a concern be raised, written records will be made by the Prevent Co-ordinator and kept separately from the student, staff or hirer's personal data and in compliance with the UST Data Protection Policy.

12.2 Confidentiality: A general principle for processing information is that information should only be shared with the consent of the subject of the information. In some circumstances however, it will not be appropriate to seek consent before sharing information with others and / or information can be shared where consent has been refused. Prevent Duty can be one of those circumstances.

12.3 The School is aware of the opportunities for informal and formal sharing of information with relevant authorities. Information sharing

will only take place with external authorities when this is consistent with the provisions of the General Data Protection Regulation and the Data Protection Act.

13 EMERGENCY PROCEDURE

The UST Business Continuity Plan sets out the response the School will make in the event of different emergency incidents. In a terror-related incidence the Emergency Services should be informed, and the Incident Team convened and the appropriate level of response actioned according to the options in the Business Continuity Plan in consultation with the police.

14 HAZARDOUS MATERIALS

Explosive Materials: Cleaning chemicals and small amounts of petrol on site should be stored in locked cupboards and should only be accessed by authorised staff. Such substances may be used by only those who have been trained in line with COSHH risk assessments. UST maintains a COSHH folder. Missing substances must be reported to the ICT and Network Administrator immediately.

15. DATA PROTECTION

15.1 Written records of any Prevent Duty concerns will be retained for as long as is necessary for the purpose for which it was obtained or as legally required or lawfully permitted.

15.2 Such written records will be held centrally and separately from a member of staff's or student's personal records.

15.3 All such records are kept in accordance with the UST Data Protection Policy.

16. RELATED POLICIES AND PROCEDURES

The following policies and procedures are related to the Prevent Policy:

- Acceptable Use of the Internet Policy
- Safeguarding Policy
- Student Code of Conduct
- Research Ethics Policy
- Learning Community MOU
- Business Continuity Plan
- Use of Buildings Guidelines

17. RESPONSIBILITIES, POLICY APPROVAL AND REVIEW

17.1 This document, as well as all other policy, procedure and guidance documents will be available to all, monitored regularly, reviewed, and evaluated periodically.

17.2 Those in positions of authority, the Senior Management Team (President, Provost and Executive Director) and the Prevent Co-ordinator have formal responsibilities under this Policy and are expected to familiarise themselves with this Policy on appointment.

17.3 The Prevent Co-ordinator will:

- undertake regular relevant training in Prevent Duty procedures
- ensure the School community receive annual training on Prevent Duty
- ensure their knowledge is kept up to date;
- act as a point of contact for those who have Prevent Duty concerns, receiving information and recording those concerns;
- act upon concerns as appropriate in the circumstances for example by making external referrals;
- monitor the implementation of this policy and procedure.

17.4 All staff, students, Lead Mentors, are expected to familiarise themselves with this policy. They also have a duty to comply with and demonstrate active commitment to it by:

- Phoning the police in the event of there being an immediate threat to life

- Talking about any concerns under this Policy with the Prevent Co-ordinator.

17.5 The Provost reviews the annual Prevent report before it is submitted to HEFCW, and provides assurance to the President who in turn provides assurance to the Board of Union Foundation (the legal charitable body which owns the School of Theology) that UST has

- has had due regard to the need to prevent people being drawn into terrorism (the Prevent duty)
- has provided to HEFCW all required information about its implementation of the Prevent duty
- has reported to HEFCW all serious issues related to the Prevent duty, or now attaches any reports that should have been made, with an explanation of why they were not submitted on a timely basis.

17.6 The Senior Management Team (President, Provost, and Executive Director) will annually review and affirm this policy, and take responsibility for achieving its objectives.

17.7 The Senior Management Team has responsibility for overseeing any complaints brought under the terms of the policy and ensuring that decision-making complies with all relevant regulatory bodies.

18. POLICY COMMUNICATION

18.1 This document can be found on the UST website www.ust.ac.uk and on the School VLE.

18.2 Every effort will be made to respond to any request to provide this policy in a different format.

18.3 This policy will be included in staff and student induction.