KINGSTON UNIVERSITY PREVENT POLICY

1.0 Introduction

1.1 Introduced under the Counter-Terrorism and Security Act 2015, the Prevent Duty requires the University, in exercising its functions, to have due regard to the need to prevent people being drawn into terrorism. The University fulfils this duty as part of its wider arrangements for safeguarding and supporting its students and staff.

Radicalisation: The process by which an individual comes to support terrorism or extremist ideologies associated with terrorist groups.
Extremism: The promotion or advancement of an ideology based on violence, hatred or intolerance that seeks to negate or destroy the fundamental rights and freedoms of others.

2.0 Purpose

2.1 The University must be able to demonstrate that its policies and procedures fulfil the requirements of the Prevent Duty. Our approach to delivering the Duty include:

- Policies and Processes for any formally organised event, meeting, activity or gathering conducted under the auspices of the University that falls outside of the normal academic curriculum and involves external speakers.
- Taking proportionate action to address the risks of people being drawn into or supporting terrorism.
- Ensuring there is no segregation on the basis of any protected characteristics at university-approved events. The University permits gender segregation for the purposes of religious worship only.
- Coordinating and providing training for staff.
- Maintaining appropriate safeguarding, welfare arrangements and support mechanisms through which concerns that an individual may be at risk of being drawn into terrorism can be identified, assessed and addressed.

3.0 Applicability

3.1 This policy applies to:

3.2 All staff employed by the University, Students, Contractors, and Visitors on Kingston University Campuses or buildings, Kingston University events or events run under the auspices of the University.

3.3 Collaborative partnerships operating in the UK are also subject to the University's Prevent responsibilities. Partners are expected to have their own Prevent Policy, or to adopt the policy of the University, and are also expected to have their own Prevent Lead.

3.4 Apprenticeships are also subject to the Prevent Duty. Employers should be aware of their Prevent responsibilities and be made aware of the University's Prevent Policy.

3.5 **Students' Union and Student Societies:** Student societies, associations and Students' Union activities conducted under the auspices of the University are expected to comply with the University's Prevent-related policies and procedures, including requirements relating to freedom of speech, external speakers, safeguarding and event management.

4.0 Governance & Responsibilities

4.1 The University will designate a Prevent Lead from among its senior members of staff. The Prevent Lead will provide oversight of the University's arrangements for meeting its responsibilities under the Prevent Duty.

4.2 The University may designate a Deputy Prevent Lead, or another appropriate member of staff, to support the Prevent Lead and/or act on their behalf where necessary, including where the Prevent Lead is unavailable or has a conflict of interest.

4.3 The Prevent Lead will draw on relevant expertise from across the University as required to support the effective implementation and ongoing review of the Prevent Duty. The Prevent Lead may convene a Prevent review group, or other appropriate meeting of relevant staff, to consider the University's Prevent risk assessment and action plan, significant Prevent-related incidents, significant changes to legislation, statutory guidance or regulatory requirements, or other matters requiring a coordinated University response. The membership and remit of any such group will be determined according to the matter under consideration.

4.4 The Prevent Lead will oversee the University's engagement with the Office for Students (OfS) in relation to its monitoring of the Prevent Duty, including the annual accountability and data return, Prevent Review Meetings where applicable, and arrangements for identifying and reporting of Prevent-related reportable events and material changes in accordance with OfS requirements.

4.5 The Board of Governors is responsible for ensuring that the University complies with its statutory Prevent Duty. The Board will receive annual assurance of the University's implementation of its Prevent responsibilities through consideration of the University's annual Prevent report and approval of the statutory OfS Prevent accountability and data return. This assurance will include confirmation that the University's Prevent risk assessment and associated action plan have been reviewed and updated as appropriate. Matters requiring the Board's attention outside the annual reporting cycle will be reported by exception.

5.0 Freedom of Speech and Academic Freedom

5.1 The University is committed to creating an environment in which lawful freedom of speech and academic freedom are secured and in which ideas and opinions can be expressed, discussed and challenged.

5.2 The University recognises the fundamental importance of freedom of speech within the law and academic freedom to universities as places of education, learning, free enquiry and

the pursuit of knowledge. Students and staff are encouraged to engage with and challenge different viewpoints, including views with which they may disagree. The University's approach is set out more fully in its Freedom of Speech Code of Practice.

5.3 In implementing the Prevent Duty, the University will have appropriate regard to its other legal duties in addition to those relating to freedom of speech and academic freedom. The University recognises that the expression of controversial or unpopular views does not, in itself, constitute a Prevent concern. Decisions involving the Prevent Duty will be taken on the basis of the circumstances and risks identified, having regard to the University's relevant legal obligations.

5.4 The University's External Speakers Policy sets out the arrangements for assessing and managing risks associated with events involving external speakers. Decisions relating to such events will be made in accordance with the Policy and the University's Freedom of Speech Code of Practice, taking account of the University's broader legal responsibilities. Where risks associated with an event or speaker are identified, the University will seek to manage these through appropriate and proportionate measures and mitigations wherever possible. Such measures may include additional event oversight, balanced representation of viewpoints, independent chairing arrangements, amended event conditions and/or enhanced security arrangements. Cancellation of an event will only be considered where identified risks cannot reasonably be mitigated.

5.5 Concerns or complaints relating to the University's compliance with its freedom of speech duties may be raised through the procedures identified in the Freedom of Speech Code of Practice.

6.0 Prevent Arrangements

6.1 Risk assessment and action plan

The Prevent Lead will ensure that the University maintains a Prevent risk assessment and associated action plan, setting out the risks identified in the University's context and the measures in place to manage and mitigate those risks. The risk assessment and action plan will be reviewed at least annually, and more frequently where circumstances require, drawing on relevant internal expertise and the advice of external Prevent partners where appropriate. The Board of Governors will receive assurance that the annual review has taken place through the University's annual Prevent reporting arrangements.

6.2 External Engagement

The Prevent Lead will ensure that appropriate communication links are maintained with relevant external and Prevent partners, including the Department for Education, the Office for Students, the local authority and relevant police and security services.

6.3 Training

Prevent training is compulsory for all staff. Staff may be required to undertake enhanced training depending on their role. Refresher training will be provided periodically, to ensure awareness remains current and effective. The Prevent Lead will ensure that arrangements are in place to support appropriate awareness of the Prevent Duty across the University community.

6.4 Monitoring and Continuous Improvement

The Prevent Lead will monitor the effectiveness of the University's Prevent arrangements through periodic review of training completion rates, Prevent referrals, external speaker activity, safeguarding trends, risk assessments and relevant regulatory developments. Lessons learned from incidents, referrals and external reviews will be used to inform continuous improvement of the University's Prevent arrangements.

7.0 Reporting and managing a Prevent Concern

7.1 The Prevent Mailbox prevent@kingston.ac.uk should be emailed in the first instance to raise any concerns in relation to Prevent. This may be to report a concern or to raise a question for assessment of a situation.

7.2 Any student or member of staff may raise a concern where they believe that an individual within the University community may be at risk of being drawn into terrorism or into supporting terrorism.

7.3 Prevent concerns will be considered through the University's appropriate safeguarding arrangements and escalated if necessary. Where a concern relates to a student, appropriate student safeguarding and wellbeing services will be involved; where it relates to a member of staff, appropriate staff support and Human Resources arrangements will apply. Where there is an immediate risk of harm, the matter will be escalated in accordance with the University's emergency and safeguarding procedures.

7.4 Where appropriate and proportionate, concerns may be referred to relevant external Prevent partners, including the local authority Prevent Team for consideration through the Channel process. Any such referral will be made in accordance with safeguarding principles, and the University's applicable records retention arrangements. Personal data will be processed in accordance with data protection legislation and the University's Data Protection Policy. Information on Prevent concerns and referrals, including relevant trends and activity, will be reported to the Board of Governors through the University's annual Prevent report and statutory accountability and data return, with matters requiring the Board's attention outside the annual reporting cycle being reported by exception.

7.5 If there is an immediate concern that a person's physical wellbeing is under threat staff should contact the University's Security Team, and the police where appropriate.

8.0 Confidentiality and Information Management

8.1 All referrals are treated with the utmost confidentiality. Information relating to Prevent concerns will be shared only where necessary, proportionate and lawful. Records will be retained securely in accordance with the University's records retention schedule and Data Protection Policy. Personal data will be processed fairly and transparently, and access to information will be restricted to those with a legitimate need to know.

9.0 Use of IT Facilities

9.1 The University's IT Security Policy prohibits the use, access, storage or distribution of material that is illegal, discriminatory, or harassing.

9.2 The University's IT facilities are, however, an open access environment and use of IT facilities by students is not routinely monitored in detail. There may be times when students or staff may need to research content that may be considered as offensive, sensitive, or extremism-related for study or research purposes. In such instances, students and staff should refer to the relevant advice on data and computer security.

10. Research Activities

The University recognises that teaching, learning and research activities may involve the exploration of terrorism, extremism, political violence and other sensitive topics. Such activities will be supported and managed through existing research governance, ethics and academic oversight arrangements, ensuring that academic freedom is protected while risks are appropriately managed.