



PREVENT POLICY

GOVERNANCE, COMPLIANCE & LEGAL OFFICE

ISSUE NUMBER: 1.1

ISSUE DATE: September 2022

REVIEW DATE: September 2023

APPROVED BY: SLT

Aim: To ensure the University meets its statutory and regulatory obligations while keeping staff and students safe.

Applies to: All University staff and students¹ (including those delivering, supporting, or studying a Kingston University validated course at a collaborative partner institution) as well as invited external speakers, of the University and UKS.

Collaborative partners must have an equivalent policy in place or can adopt this policy; this will be confirmed as part of partnership due diligence.

1.0 Introduction

1.1 Introduced under the Counter-Terrorism and Security Act 2015, the Prevent Duty requires universities to take appropriate steps to prevent people being drawn into terrorism. As part of its role safeguarding and supporting students and staff, the University, like other educational institutions, has a statutory responsibility to adhere to the government's Prevent Duty.

2.0 Purpose

2.1 The University must be able to demonstrate that its [policies](#) and procedures fulfil the requirements of the [Prevent Duty](#). Measures in place to do this include:

- Processes to assess speakers invited on to campus or to participate in online forums
- Ensuring those expressing extremist views do not go unchallenged
- Ensuring there is no gender segregation at university-approved events
- Coordinating and making available training for staff
- Making sure students and staff are aware of the different types of support available to them

3.0 Applicability

3.1 All staff employed by the University, Students, Contractors, and Visitors, on Kingston University Campuses or buildings or at Kingston University events.

3.2 Collaborative partnerships operating in the UK are also subject to the University's Prevent responsibilities. Partners are expected to have their own Prevent Policy, to

¹ 'Students' includes apprentices studying on a higher or degree apprenticeship course.

adopt the policy of the University, and are also expected to have their own Prevent Lead.

- 3.3 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.

4.0 Governance & Key Staff 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 execution of the University's Prevent responsibilities.

- 4.2 The Prevent Lead will designate a Deputy Prevent Lead to assist with execution of the Prevent Lead's responsibilities and who will assume the responsibilities of the Prevent Lead should the Prevent Lead be unavailable, incapacitated, or in a conflict of interest on a particular matter.

- 4.3 The University will have a Prevent (Review and Implementation) Group, convened by the Prevent Lead and drawing its membership from staff with responsibilities for executing Prevent expectations from across the University. Chaired by the Prevent Lead, the group reviews all activity in relation to the Act and monitors implementation of statutory guidance relating to it. The group is responsible to the Vice-Chancellor, as the University's Accountable Officer.

- 4.4 The Prevent Lead will take responsibility for the requirement to report matters relating to the University's compliance with the Prevent Duty to the OfS through its reportable events reporting requirements.

- 4.5 The Board of Governors of the University will be updated on assurance of the University's compliance with its Prevent responsibilities and the Governors will be presented, for approval, the University's statutory Prevent return for submission to the OfS in advance of the deadline for submitting the return.

5.0 Freedom of Speech within the Law

- 5.1 We are proud to be a vibrant University community, where people from all backgrounds can come together to share their views and experiences and in which ideas can be heard and tested.

- 5.2 We encourage our students to show they can challenge and interrogate different viewpoints in a thoughtful, tolerant and courteous way.

- 5.3 The University is committed to upholding freedom of speech and has a statutory responsibility to do so. At the same time, it has a responsibility to all staff, students and members of the public, including any speakers, to ensure there are processes and procedures in place to safeguard them.

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5.4 Our [Freedom of Speech: External Speakers and External Events Policy](#) supports this by requiring staff and students to seek clearance for speakers whose engagement may require exceptional resources or safety considerations. The University works closely with the Union of Kingston Students to agree mitigating safety measures ahead of such events going ahead.

5.5 The University is committed to ensuring freedom of speech within the law for its employees, students and visiting speakers. Nothing in this policy is intended to limit staff or student freedom of expression within the law.

6.0 Preventative Steps

6.1 The University Prevent Lead will ensure there is a University Prevent risk register, regularly updated and overseen by the Prevent (Review and Implementation) Group.

6.2 The Prevent Lead and Deputy Lead will maintain communication links with bodies external to the University in relation to Prevent, including the Department for Education, the Office for Students, the local authority, and relevant police services.

6.3 The Prevent Lead and Deputy Lead will, working with the Prevent (Review and Implementation) Group, ensure that there is training on Prevent available to relevant staff and students.

7.0 Reporting 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 become concerned that an individual within the University is at risk of being drawn into terrorism. Concerns may be about terrorism, radicalisation and violent extremism, or where individuals are at risk of moving from extremist (albeit) legal groups into terrorist-related activity.

7.3 Staff and students are encouraged to be mindful of conduct by individuals within the University that may indicate that they are at risk of being drawn into terrorism.

7.4 Unless the Prevent Lead or Deputy Lead judges that there is a direct threat of physical harm, these concerns will initially be directed towards appropriate internal safeguarding provisions: Student Wellbeing where the matter concerns a student; Human Resources where it concerns a member of staff.

7.5 Serious concerns may be subject to referral to external Prevent partners. Concerns will be shared externally. A confidential record of action taken, including where it has been necessary to refer a concern externally, will be retained. All information will be held and processed in accordance with data protection legislation and the University's Data Protection Policy.

7.6 If there is an immediate concern that a person's physical wellbeing is under threat staff are guided to contact University Security, and the police where appropriate.

8.0 Confidentiality

8.1 All referrals are treated with the utmost confidentiality and in compliance with the University's personal data policies and GDPR.

9.0 Activities on Campus

9.1 We require all speakers who attend events across any of our campuses, or being held online, to conform to the University and the Union of Kingston Students' (UKS) equality policies, which include a joint values statement. Both the University and UKS reserve the right to deny access to a speaker, or to stop a talk, if an individual or organisation refuses to comply with these requirements or breaches the values statement in any way.

9.2 Full details may be found in the University's [Freedom of Speech and External Speakers Policy](#).

10.0 Activities off Campus (e.g. school visits, field trips, placements, volunteering opportunities, union activities)

10.1 We require all staff employed by the University, Students, Contractors, and Affiliate Members (including collaborative partners, volunteers and honorary appointees) conducting university business or taking part in activities related to the University, to adhere to the Prevent Duty requirements.

10.2 Per section 3.2 of this policy, collaborative partnerships operating in the UK are also subject to the University's Prevent responsibilities. Partners are expected to have their own Prevent Policy, to adopt the policy of the University, and are also expected to have their own Prevent Lead.

10.3 Per section 3.3 of this policy, 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.

11.0 Use of IT Facilities

11.1 The University's [IT Security Policy](#) prohibits the use, access, storage or distribution of material that is illegal, discriminatory, or harassing.

11.2 The IT facilities are, however, an open access environment and use of IT facilities by students is not routinely monitored in detail and there may be times students might need to research content that may be considered as offensive, sensitive, or

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extremism-related for research purposes as part of their course. Advice on data and computer security and keeping safe online is provided for staff and students.