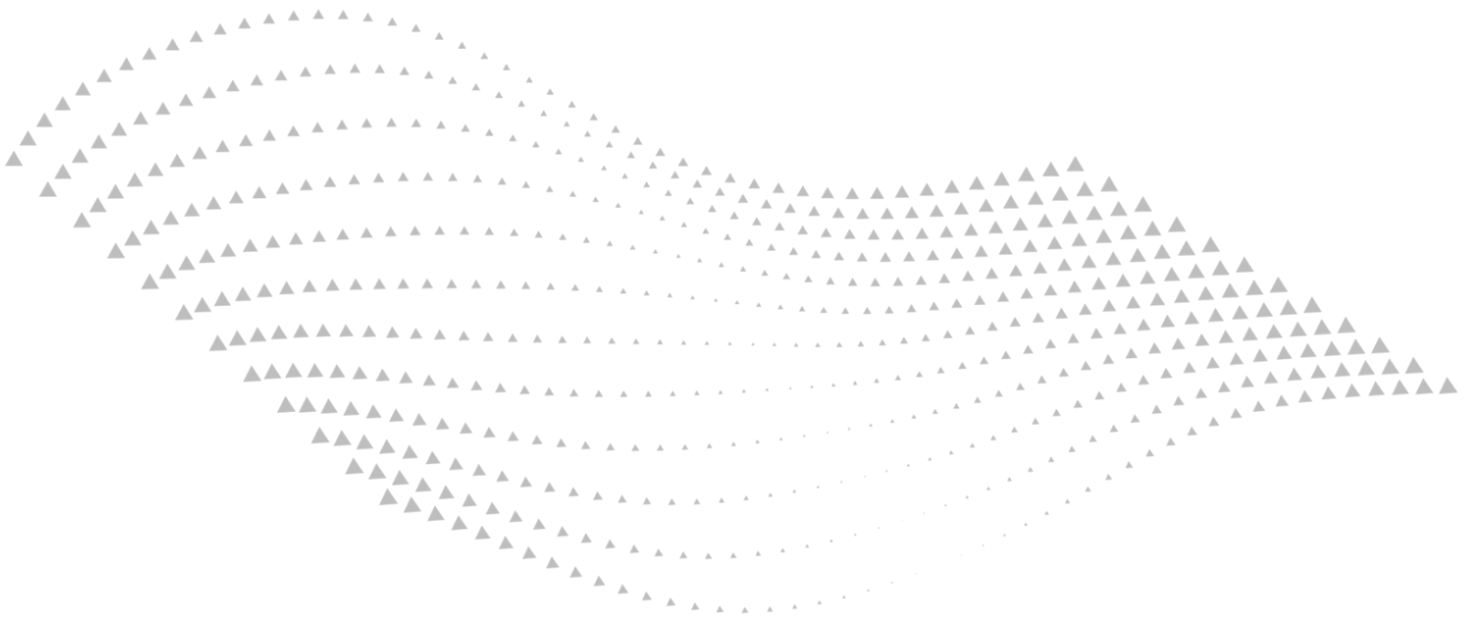


Prevent Duty Policy



Approved by:	BIMM University Limited Board
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Expiry:	April 2030
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Previous Version:	https://bimm.ac.uk/prevent-duty-v1 Change made to Campus Prevent Lead since version 2.0

1 Applicability

- 1.1 This Policy applies to all staff and students at BIMM University's campuses located in the United Kingdom (UK) to ensure that it meets UK legislation. However, the same approach will be applied to our campuses outside of the UK to ensure consistency. The associated [External Guest Booking procedure](#) and policies linked to from this policy will apply to all of BIMM University's campuses, including those outside of the UK.
- 1.2 This Policy applies to all BIMM University staff, students and delivery undertaken on behalf of the University, including validated and franchise provision. BIMM University retains overall responsibility for Prevent compliance for all students registered with the University, regardless of delivery location.
- 1.3 BIMM University's responsibilities will vary depending on the partner's Office for students (OfS) Registration status:
 - 1.3.1 **OfS registered partners** are Relevant Higher Education Bodies in their own right and are subject to the statutory Prevent Duty, including their own obligations for risk assessment, staff training, external speakers and referrals. Where an OfS-registered partner delivers BIMM University provision (either in a validated or subcontractual arrangement), the partner must meet its own Prevent requirements and ensure that its arrangements are compatible with the standards and expectations set by BIMM University for its awards.
 - 1.3.2 **Non-OfS-registered partners** are not subject to the statutory Prevent Duty. In these cases, BIMM University retains full accountability for Prevent compliance. Such partners are therefore required, through partnership agreements and associated operational procedures, to align their safeguarding and Prevent-related arrangements with BIMM University's expectations. All Prevent-related concerns involving BIMM University-registered students must be escalated to BIMM University's Prevent Lead, and non-OfS-registered partners must not make external Prevent, police or Channel referrals independently.
- 1.4 BIMM University provides all partners with required guidance, escalation routes and training expectations. Detailed operational requirements are set out in partnership agreements and supporting procedures rather than in this Policy.
- 1.5 The Prevent expectations in this Policy also apply proportionately to commercial partnerships, venue hires and other external arrangements where BIMM University organises activities involving its students or staff. External venues or service providers are not expected to comply with the Prevent Duty themselves; however, BIMM University will ensure that such arrangements do not introduce Prevent-related risks and that BIMM University-led events follow the University's established safeguarding, external speaker and escalation procedures.
- 1.6 This Policy is designed to help both staff and students understand their responsibilities in respect of BIMM University's statutory duties in respect of Prevent Duty, as well as the expectations of Prevent in circumstances where it is reasonably believed that an individual is at risk of being drawn into terrorism and who to contact at BIMM University where such concerns arise. It is in this context that BIMM University will seek to ensure the vulnerable individuals within its community

are safeguarded from being drawn into terrorism.

- 1.7 BIMM University has taken a risk-based approach to put in place appropriate measures at an institutional level to ensure that the risks of members of its staff and students being radicalised are minimised, whilst at the same time balancing its other legal duties, including the need to ensure freedom of speech and academic freedoms within the law and to promote equality and diversity. This Policy forms part of that approach.
- 1.8 No processes or mechanisms will be created for the express purpose of monitoring and reporting students or staff, and existing policies and procedures will be used to ensure the safety and wellbeing of BIMM University's community. No referral will be made to the authorities and/or the Channel Programme without the express authority of the Campus Prevent Leads (see also 4.1.2) following advice from the BIMM University Prevent Duty Lead. See also the Prevent Duty Referral Procedure

2 Introduction & Definition

- 2.1 The Counter Terrorism & Security Act 2015 places a duty on all Relevant Higher Education Bodies (RHEB) to have due regard to the need to prevent people from being drawn into terrorism. This legislation is given specific statutory force through the Prevent Duty guidance for Higher Education (HE) institutions in England and Wales, referred to as the 'Prevent Duty'. Prevent is one strand of the UK Government's counter-terrorism strategy.
- 2.2 The underlying considerations adopted by BIMM University in implementing the Prevent Duty are:
 - a commitment to the safety and wellbeing of our staff and students and all who interact with BIMM University, including not being victims of or complicit with any activities linked to radicalisation.
 - upholding the legislative requirements and championing the spirit of academic freedom and freedom of speech within the law and with the appropriate obligations and responsibilities arising from such freedoms (see also section 2.6).
 - that the requirements described in this Policy are implemented in a proportionate and risk-based manner.
- 2.3 The legal definition of terrorism as stated in the Terrorism Act 2000¹ is "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 or 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."
- 2.4 Terrorism may take the form of extremist behaviour and acts, and the statutory guidance² defines extremism as "the promotion or advancement of an ideology based on violence, hatred or intolerance, that aims to:
 1. negate or destroy the fundamental rights and freedoms of others; or
 2. undermine, overturn or replace the UK's system of liberal parliamentary democracy and democratic rights; or
 3. intentionally create a permissive environment for others to achieve the results in (1) or (2).

¹ [Terrorism Act 2000](#)

² [New definition of extremism \(2024\) - GOV.UK](#)

- 2.5 Radicalisation is defined as the process by which a person comes to support terrorism and extremist ideologies associated with terrorist groups.
- 2.6 In accordance with this definition, BIMM University considers that extremist ideologies, and those who express them, undermine the principles of freedom of speech and academic freedom. Freedom of speech and academic freedom are separate but interrelated liberties and are key features of student life. BIMM University has a separate [Freedom of Speech Policy](#) which sets out the legal obligations, rights and responsibilities related to preserving this freedom.

3 Scope & Application of this Policy

- 3.1 The purpose of this policy is to provide high-level information on the requirements of the Prevent Duty, BIMM University's approach to complying with it, and how the arrangements required therein are being satisfied. Further details on specific arrangements in place are provided in separate policies and procedures (as noted throughout this Policy).
- 3.2 The Prevent Duty, as set out in the Counter Terrorism and Security Act 2015, does not apply to activities undertaken by BIMM University in other countries. However, it is expected that any BIMM University activities undertaken overseas remain consistent with the approach outlined in this policy. Accordingly, BIMM University applies its Safeguarding and Prevent-related processes and procedures across all teaching locations, including those outside the UK, to ensure alignment with institutional standards, even though the statutory duty itself does not legally extend to other countries.
- 3.3 BIMM University understands the [Channel Process](#) and the opportunities for informal and formal sharing of information with the relevant authorities. It will use these opportunities when considered reasonably necessary and appropriate to do so in the interests of the Prevent Duty. Information sharing will only take place with external authorities when this is consistent with the provisions of the Data Protection Act 2018.

4 Arrangements to Deliver the Prevent Duty

4.1 Governance

- 4.1.1 BIMM University Limited Board (BULB) has a statutory responsibility to ensure BIMM University satisfies the requirements of the Prevent Duty, with leadership and implementation delegated to the Chief Operating Officer & Deputy Vice-Chancellor (COO&DVC) (as Prevent Lead) for relevant matters. The Prevent Lead is responsible for ensuring that BIMM University complies appropriately with the Prevent Duty in accordance with guidance issued from time to time by responsible bodies, including the UK Government and the Office for Students (OfS). The Prevent Lead will also ensure that all BIMM University staff are aware of their need to pay due regard to the Prevent Duty, ensure that staff have access to training on the risks related to the Prevent Duty and how to respond appropriately and that key staff have more detailed training on how to support and safeguard vulnerable students and staff and on the use of referral mechanisms in appropriate cases.
- 4.1.2 The Head(s) of School at each campus will collectively (where there is more than one School) fulfil the role of Campus Prevent Lead, with responsibility for developing and maintaining links with Regional Prevent Coordinators. Where a campus has more than one School, the Head of School for the area in which the concern arises would normally take the lead. However, any Head of School may act in capacity as Campus Prevent Lead as required.

- 4.1.3 This Policy and its associated procedures are kept under annual review by Academic Board (which may delegate to an appropriate subcommittee), with ultimate approval of the policy, and responsibility for ensuring compliance with the Prevent Duty resting with BULB.

4.2 Risk Assessment & Action Plan

- 4.2.1 BIMM University continually assesses where and how its students might be at risk of being drawn into terrorism and manages risk by looking at institutional policies regarding its campuses and student welfare, including equality and diversity and the safety and welfare of students and staff. The risk assessment also assesses the physical management of BIMM University's estates, as well as policies and procedures for events held by staff, students or visitors (including external speakers), use of IT systems, and relationships with external bodies and community groups who may use premises, or work in partnership with BIMM University. The Prevent Duty Risk Assessment will include risks associated with partnership provision, including delivery environments, staff training levels, external speaker arrangements, and the capacity of partners to recognise and escalate Prevent-relevant concerns.
- 4.2.2 The Prevent Duty Risk Assessment is kept under review by Academic Board and reviewed annually to ensure relevance prior to BIMM University's annual Prevent Accountability and Data Return (ADR) to the OfS. This includes proposed actions which BIMM University will take to mitigate these risks. Academic Board will report annually to BULB to provide assurance that BIMM University's responsibilities under the Prevent Duty are being effectively discharged.

4.3 External/Visiting Speakers & Events

- 4.3.1 BIMM University has robust procedures for approving External/Visiting Speakers and Events. The [External Guest Booking Procedure](#) sets out the arrangements for managing in-person events on University premises, as well as online events, and the use of University premises by third parties. The procedure is set within the context of BIMM University's statutory responsibility to secure freedom of speech.
- 4.3.2 A risk-based approach will be taken to the assessment of events. Where risks are identified, BIMM University will take all reasonably practicable steps to secure freedom of speech within the law, which may include proportionate modifications to the content, format, or operational arrangements of events to mitigate risk in line with the Prevent Duty. Only in exceptional circumstances, and where speech would be unlawful (for example, where speakers promote or seek to incite hatred or violence), the University may prohibit an event. For full details, please refer to the [External Guest Booking Procedure](#).

4.4 Staff Training

- 4.4.1 BIMM University will develop and make accessible training materials available to academic and professional services staff outlining the requirements of the Prevent Duty, including guidance and support provided at a national level to support the delivery of training within Relevant Higher Education Bodies (RHEBs). Training will also be delivered to appropriate staff to aid awareness of the Prevent Duty and its requirements and the arrangements BIMM University has in place to seek to prevent staff or students from being drawn into terrorism or becoming victims of it. This will include training appropriate members of staff to understand the factors that make people support terrorist ideologies or engage in terrorist-related activity, to recognise vulnerability to being drawn into terrorism, and to

be aware of what action to take in response, rather than direct intervention.

- 4.4.2 Campus Prevent Leads should be contacted in confidence where staff have specific concerns – they can provide support and guidance as necessary and identify when referral to another body is appropriate.

4.5 Student Training

- 4.5.1 BIMM University will provide proportionate Prevent awareness training to students, as part of its commitment to safeguarding and to meeting its statutory responsibilities under the Prevent Duty. This training is delivered during the induction period via the online portal and reinforced through ongoing awareness activities. The training supports students in understanding the risks of radicalisation, recognising concerning behaviours, and knowing how to report issues through BIMM's established safeguarding channels.
- 4.5.2 Training content will be reviewed and adapted in response to changes in local or national risk, reflecting the requirement that education providers safeguard learners from extremist ideologies and remain aware of evolving vulnerabilities.

4.6 IT Networks

- 4.6.1 BIMM University expects its students to engage with IT systems in a responsible and safe manner that supports a secure digital environment. In line with the University's Student Fair Usage Policy, the use of networks to access, share, or attempt to bypass protections around harmful, illegal, extremist, or terrorist-related content is strictly prohibited. Any activity that gives rise to safeguarding or Prevent concerns will be managed through established escalation and referral procedures.
- 4.6.2 BIMM University's web-filtering mechanisms ensure that its IT networks or equipment cannot be used by staff or students to access, support, promote or facilitate harmful content, including extremism-related material, unless this is for teaching and research purposes as approved by BIMM University. The communication of policy on this matter will be covered in BIMM University's [IT Infrastructure Acceptable Use Policy](#).

4.7 Social Media

- 4.7.1 BIMM University has a statutory obligation under the Prevent Duty to ensure that social media is not used to promote extremist material or activities which may place people at risk of being drawn into terrorism; therefore, its social media channels are monitored regularly, and action will be taken to address any misuse of social media which is in breach of this policy. See also BIMM University's [Student Social Media Policy & Guidelines](#) and [Staff Social Media Policy](#).

4.8 Communications

- 4.8.1 BIMM University has a statutory obligation under the Prevent Duty to ensure that material is not distributed or displayed on its premises which promotes terrorism or related extremist activities, or which may place people at risk of being drawn into terrorism. Therefore, action will be taken to remove any material if identified and steps will be taken to address any publication of material in breach of this Policy. Any decisions taken will also be in accordance with the Freedom of Speech Policy.

4.9 Student Engagement

- 4.9.1 BIMM University engages with students to ensure they understand the policies, procedures, and expectations associated with the Prevent Duty, and provides clear information and accessible reporting and safeguarding routes.
- 4.9.2 Students organising events or inviting external speakers must follow the University's established approval and risk-assessment processes outlined in the [External Guests Booking Procedure](#).

4.10 Safeguarding & Reporting

- 4.10.1 The implementation of the Prevent Duty is not to challenge or reshape the current relationship between staff and students, or between any other stakeholders who make up the extended University community. Instead, the focus is that, in the rare event that a member of our community – be it a staff member, student, or anyone else connected with BIMM University – has a serious concern that someone else in our community is potentially being drawn into violent extremism or terrorism, they know where to seek advice and what to do with that concern. Information in what to do in these cases can be found in BIMM University's Prevent Duty Referral Procedure. See also BIMM University's [Safeguarding Policy](#).

5 **Statutory Responsibilities**

- 5.1 The OfS is the principal regulator of BIMM University and has established a [monitoring framework](#) to assess compliance of all RHEBs with the Prevent Duty. BIMM University has a legal duty to provide reports and evidence of its compliance with the Prevent Duty to OfS, including serious issues which arise related to BIMM University's Prevent responsibilities. The OfS may at any point assign an appropriate body to assess BIMM University's compliance with the Prevent Duty.
- 5.2 BIMM University has a responsibility to notify the OfS of any significant changes of circumstance affecting its Prevent responsibilities (such as a change in Prevent Duty Lead or changes to core policies), or of any Prevent-related serious incidents and significant changes of circumstance must be reported as reportable events under ongoing condition F3, via the OfS portal, as soon as possible.
- 5.3 BIMM University must submit an Annual Accountability and Data Return (ADR), including an Accountability Statement, to the OfS in December of each year. This includes the total number of External Guests who have attended an event (as set out in section 4.3.1), via scrutiny by the Prevent and Freedom of Speech Committee each semester. The final ADR, containing data for the previous Academic Year, is approved by BULB and submitted to the Trimester 2 meeting of Academic Board for information.