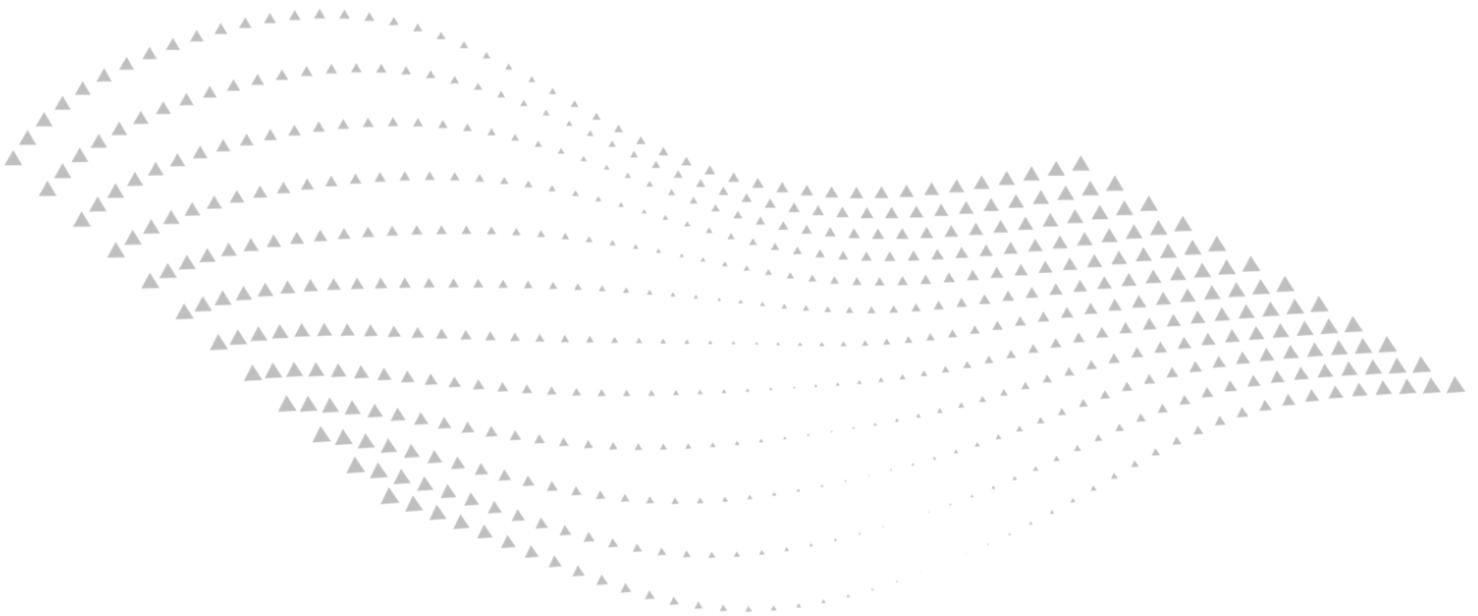


BIMM
UNIVERSITY

A university
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Prevent Duty Policy



Last approved: April 2022

Approved by: BIMM University Limited Board

Next review due: April 2026

1 Applicability

- 1.1 This Policy applies to all staff and students at BIMM University’s Colleges located in the United Kingdom (UK). However, the associated [External Guest Booking Procedure](#) and policies linked to from this policy may apply to all of the University’s colleges, including those outside of the UK.
- 1.2 This Policy is designed to help both staff and students understand their responsibilities regarding of the 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 the University where such concerns arise. It is in this context that the University will seek to ensure the vulnerable individuals within its community are safeguarded from being drawn into terrorism.
- 1.3 The 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.
- 1.4 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 the University’s community. No referral will be made to the authorities and/or the Channel Programme without the express authority of the Local Prevent Leads (see also 4.1.2) following advice from the BIMM University Limited Prevent Duty Lead.

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 the University in implementing the Prevent Duty are:
 - a commitment to the safety and wellbeing of our staff and students and all who interact with the 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 2000 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 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”. The University promotes these values to its students, as outlined in its [Universal Values Statement](#).

- 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, the 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. The 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, the 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 Prevent Duty requirements do not apply to activities undertaken by the University in other countries, although it would be expected that any activities directly related to the University overseas would not be at odds with this Policy. To this end, all Prevent-related processes and procedures apply to all teaching locations and countries.
- 3.3 The University is aware of the [Channel Process](#) and of 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 has a statutory responsibility to ensure the University satisfies the requirements of the Prevent Duty, with leadership and implementation delegated to the Academic Director & Provost (as Prevent Lead) for relevant matters. The Prevent Lead is responsible for ensuring that the 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 OfS. The Prevent Lead will also ensure that all 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 Each College/Department is responsible for appointing an appropriate member of its staff to act as a Local Prevent Lead, who will be responsible for developing and maintaining links with local Prevent Partners.
- 4.1.3 This Policy and its associated procedures are kept under annual review by the University’s Quality

Assurance & Compliance Committee (QACC) on behalf of the Academic Board, with ultimate responsibility for ensuring compliance with the Prevent Duty resting with the BIMM Limited Board.

4.2 Risk Assessment & Action Plan

4.2.1 The University continually assesses where and how its students might be at risk of being drawn into terrorism. The University manages risk by looking at institutional policies regarding its colleges 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 the 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 the institution.

4.2.2 The Prevent Duty Risk Assessment is kept under review by QACC and reviewed annually, reported to Academic Board and the BIMM Limited Board to ensure relevance prior to the University's annual Prevent Return to the OfS. This includes proposed actions which the University will take to mitigate these risks. QACC will report annually to the BIMM Limited Board with a view to providing reassurance to the Board that the University's responsibilities under the Prevent Duty are being effectively discharged.

4.3 External/Visiting Speakers & Events

4.3.1 The 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 the University's statutory responsibility to secure freedom of speech.

4.3.2 A risk-based approach to the assessment of events will be taken, and this may require modification of adjustments to the content of or arrangements for events to mitigate risks in respect of the Prevent Duty. In exceptional circumstances only, the University reserves the right to prohibit events where speakers promote or seek to incite hatred of, or violence against others. For full details, please refer to the [External Guest Booking Procedure](#).

4.4 Staff Training

4.4.1 The 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 the University has in place to seek to prevent staff or students from being drawn into terrorism or become 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. Local 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 IT Networks

4.5.1 The University is currently reviewing its existing web-filtering mechanisms to 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 the University. The communication of policy on this matter will be covered in the University's [IT Infrastructure Acceptable Use Policy](#).

4.6 Social Media

4.6.1 The 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 the University's [Student Social Media Policy & Guidelines](#) and [Staff Social Media Policy](#).

4.7 Communications

4.7.1 The 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.

4.8 Student Engagement & the Student Association

4.8.1 The University is committed to engaging with its students in relation to Prevent Duty requirements. The BIMM Student Association (BSA) is still evolving and, therefore, the University commits to working with BSA in this regard.

4.9 Safeguarding & Reporting

4.9.1 The implementation of the Prevent Duty is not to challenge or re-shape 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 the 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 the University's [Safeguarding Policy](#).

5 Values

5.1 The Department for Education (DfE) expects schools and Further Education (FE) colleges to promote the values of “democracy, the rule of law, individual liberty and mutual respect and tolerance for those with different faiths and beliefs”. Institutions are expected to encourage students to respect other people with particular regard to the protected characteristics set out in the [Equality Act 2010](#), as these have a part to play in preventing extremism and building resilience to grooming and radicalisation. For details of how these values are promoted across the University's provision, please see our [Universal Values Statement](#).

6 Statutory Responsibilities

6.1 The Office for Students (OfS) is the principal regulator of the University and has established a [monitoring framework](#) to assess compliance of all RHEBs with the Prevent Duty. The 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 the University's Prevent responsibilities. The OfS may at any point assign an appropriate body to assess the University's compliance with the Prevent Duty.

- 6.2 The 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 incidents (if applicable).
- 6.3 The University must submit an Annual Return, 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 QACC each semester. A final statement, containing data for the previous Academic Year, is approved by BIMM Limited Board and submitted to the Semester 1 meeting of Academic Board for information.