

UNIVERSITY POLICY AND MANAGEMENT PROCEDURE

Prevent Statutory Duty

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Statement

*This University Policy and Management Procedure was approved and authorised by the Health, Safety and Welfare Committee on **16 February 2016** on behalf of the University of York Council and forms part of the Health and Safety Policy of the University of York.*

This document is a Management Procedure for good health and safety management practice. This Management Procedure provides Heads of Departments and Colleges and all managers, staff and students with the necessary information to incorporate healthy and safe practices and relevant procedures into their activities. Divergence from this Management Procedure may result in Heads of Departments and Colleges and the University of York being exposed to possible legal proceedings.

The use of this Management Procedure and the incorporation of its requirements into working practices and activities will ensure that the University of York and its community achieve compliance with its legal duties regarding health, safety and security.

The most recent version of this Management Procedure is available at <http://www.york.ac.uk/admin/hsas>.

<i>Date of Latest Review</i>	<i>February 2016</i>	<i>By</i>	<i>Director of Health, Safety and Security</i>
<i>Date of Previous Review</i>			
<i>Date of Next Review</i>	<i>February 2018</i>		

UNIVERSITY POLICY

1. INTRODUCTION

Following statutory guidance issued under Section 29 of the Counter-terrorism and Security Act 2015, a duty is placed upon the University of York (University) in exercising our undertakings to have 'due regard to the need to prevent people (staff, students and visitors of the University) from being drawn into terrorism'.

The Prevent Strategy, published by the Government in 2011, forms part of its overall Counter-terrorism Strategy known as CONTEST. There are four identified work streams, each comprising a number of key objectives:

- **Pursue:** to stop terrorist attacks.
- **Prevent:** to stop people becoming terrorists or supporting terrorism.
- **Protect:** to strengthen our protection against a terrorist attack.
- **Prepare:** to mitigate the impact of a terrorist attack.

The stated aim of the Prevent Strategy is to reduce the threat to the UK from terrorism by stopping people becoming terrorists or supporting terrorism.

The 2011 Prevent Strategy has three specific strategic objectives:

- Respond to the ideological challenge of terrorism and the threat we face from those who promote it.
- Prevent people from being drawn into terrorism and ensure that they are given appropriate advice and support.
- Work with sectors and institutions where there are risks of radicalisation that we need to address.

The strategy states that terrorist groups often draw on extremist ideology, developed by extremist organisations. Some people who join terrorist groups have previously been members of extremist organisations and have been radicalised by them. The Government has defined extremism in the Prevent Strategy 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. Included in those definitions of extremism are calls for the death of members of our armed forces".

The University will meet its legal obligations under the Act by implementing control measures and mitigation arrangements.

1.1 Current Threats

The UK Government's approach to Prevent is intended to deal with all kinds of terrorist threats to the UK. The Government believes that the most significant of these threats is currently from terrorist organisations in Syria and Iraq, and groups associated with Al Qa'ida. However, individuals and groups associated with the extreme right are also believed to pose a continued threat to public safety and security.

2. PREVENT DUTY - A RISK-BASED APPROACH

In complying with the Prevent Duty, the University aims to demonstrate an awareness and understanding of the risk of radicalisation within the institution. This risk may vary greatly and can change rapidly, but no area within the institution is entirely risk free.

There are three themes for consideration:

- Effective leadership
- Working in partnership
- Appropriate capabilities.

2.1 Leadership

The University aims to establish and, where appropriate, make full use of the many existing mechanisms to understand the risks of radicalisation. To ensure the University community understands the risks and builds the capabilities to deal with it, the University will communicate the importance of this duty and ensure it is implemented effectively.

2.2 Partnership

Through regular communications, meetings and involvement with both internal and external agencies, the University will maintain effective partnership arrangements. The University will ensure productive co-operation and engagement with key stakeholders, including (but not limited to):

- North Yorkshire Police (NYP)
- Prevent Implementation Board (PIB), City of York Council (CYC)
- Local and National Prevent Co-ordinators
- Community Safety Partnerships
- Higher York
- Counter Terrorism and Security Team (CTSA)

- Association of University Chief Security Officers (AUCSO)
- Safer Campus Communities
- All internal University stakeholders (Executive Board, Student Support Services, College Teams, Security Services, staff and students)
- York University Students Union (YUSU)
- Graduate Students Association (GSA)
- Chaplains Services.

In fulfilling the duty in section 26 of the Act, the University will seek to prevent people from being drawn into terrorism. How this is done, and the extent to which this is done, will depend on many factors.

2.3 Capabilities

The University will ensure that our staff who engage with students, visitors and members of the public understand what radicalisation means and why people may be vulnerable to being drawn into terrorism as a consequence of it. The University will seek to make staff aware of how the Government understands the term “extremism” and the relationship between extremism and terrorism.

The University will communicate what our arrangements and available support services are to help prevent people from becoming drawn into terrorism.

The University will ensure that appropriate awareness training is available and accessible to empower our staff and students. Staff will have access to the Learning Management System (LMS) that is maintained by Human Resources, Learning and Development. Students will have access via the Virtual Learning Environment (VLE); the extent to which both systems are used is fully auditable.

2.4 Information Sharing

The University may need to share personal information about staff and students to ensure, for example, that a person at risk of radicalisation is given appropriate support (for example via the Channel programme). Information sharing will be assessed on a case-by-case basis and is governed by legislation (this approach will include stated criteria for any judgement, public identification of those making the judgement and a process of accountability for any judgement). To ensure the rights of individuals are fully protected, the University’s Records Manager will be consulted.

When considering sharing personal information, the University will take account of the following:

- Necessity and proportionality: personal information will only be shared where it is strictly necessary to the intended outcome and proportionate to it. Key to determining the necessity and proportionality of sharing information will be the professional judgement of the risks to an individual or the public.
- Consent: wherever possible, the consent of the person concerned will be obtained before sharing any information about them.
- Power to share: the sharing of data by public sector bodies requires the existence of a power to do so, in addition to satisfying the requirements of the Data Protection Act 1998 and the Human Rights Act 1998.
- Data Protection Act and the Common Law Duty of Confidentiality: in engaging with non-public bodies, the University will ensure that it is aware of its responsibilities under the Data Protection Act and of any confidentiality obligations that exist.

There may be some circumstances where the University, in the course of Prevent related work, identifies someone who may already be engaged in illegal terrorist-related activity. The names of individuals suspected of being involved in such activity will be referred to the Police.

3. MONITORING ARRANGEMENTS

The monitoring framework for overseeing universities will be operated by the Higher Education Funding Council for England (HEFCE) and is intended to satisfy Government that 'Relevant Higher Education Bodies' (RHEBs) are fulfilling their duty under the Counter-Terrorism and Security Act 2015 to have due regard to the need to prevent people being drawn into terrorism.

3.1 Reporting Requirements and Timetable

The Act requires all RHEB to provide HEFCE with any information required for the purposes of monitoring compliance with the Prevent Duty. The framework sets out how information will be gathered to demonstrate compliance. The link below outlines the HEFCE monitoring framework:

<http://www.hefce.ac.uk/reg/prevent/>

Preliminary self-assessments were due with HEFCE by 22 January 2016. Additional information and more detailed returns are required by 01 April 2016, with Annual Reports from the University's Governing Body by 01 December 2016 and annually thereafter. A full submission of Prevent Duty documentation is to be provided by 01 March 2017 and on a 5-yearly cycle thereafter.

All RHEBs are required to provide HEFCE with any information needed for the purposes of monitoring performance in discharging the Prevent Duty. If an RHEB fails to provide information, the Secretary of State may give directions to enforce compliance, and such directions themselves may be enforced by a Court Order.

A copy of the Prevent Duty compliance and preliminary Risk Self-assessment Report is at Appendix 3 of this University Policy and Management Procedure.

3.2 Reporting Material Details

The detailed material required by HEFCE is as follows:

- a. A copy of the University's:
 - Prevent Risk Self-Assessment
 - Action Plan in response to that risk assessment
 - University Policies and Management Procedures for managing and mitigating the risks around External Speakers and Events Management on campus and University-branded events taking place off campus.
 - Institutional University Policies that reflect the University's duty to ensure Freedom of Speech on campus and its arrangements to protect the importance of Academic Freedom.
- b. A University Report summarising the institution's arrangements for the following where they are not already covered in the risk assessment or action plan:
 - Senior Management and Governance oversight of the implementation of its Prevent duty obligations and engagement with Prevent partners
 - Engagement with and consulting staff and students on the University's plans for implementing the Prevent Duty
 - Training appropriate staff about Prevent (all staff will have access to

the Channel Awareness module)

- Sharing information internally and externally about potentially vulnerable individuals, where appropriate
- Sharing information about external speakers with other institutions, where legal and appropriate (if not covered in the external speakers and events policies)
- Ensuring sufficient pastoral and chaplaincy support for all students (including arrangements for managing prayer and faith facilities)
- The use of the institution's computer facilities (hardware, software, networks, social media), to include consideration of filtering arrangements and of academic activities that might require online access to sensitive or extremism-related material
- Engaging with Students' Unions and Societies, which are not subject to the Prevent Duty but are expected to cooperate with their institution.

c. Additional information and data:

'Channel' programme

- The number of people considered for referral to the Channel programme
- The number of people referred to the Channel programme
- The number of people accepted onto the Channel programme.

Events and Speakers

- The number of events and speakers referred to the highest levels of approval required by the RHEB procedure.

Staff Training

- The number of staff who received Prevent-related training, with an indication of the nature of the training, including where different categories of staff received different training.

d. **The Annual Report:**

The annual report should demonstrate active engagement by the institution in delivering the Prevent Duty during the last operating or academic year:

- Address all of the topics listed above, describe activities undertaken during the period and provide evidence of their effectiveness. HEFCE will encourage, but not require, the inclusion of case studies, particularly to illustrate engagement with the duty
- Include data about: Channel referrals; events and speakers on

campus; staff training.

HEFCE will require the annual report to include the following three declarations by the governing body or proprietor:

‘Throughout the Academic Year and up to the date of approval:

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

3.3 How HEFCE will discharge its role

The duty applies to a wide range of providers with very different institutional structures and cultures. RHEBs are responsible for assessing Prevent-related risks in their own context and deciding on appropriate and proportionate actions in response to their assessment of those risks. HEFCE will assess whether the Action Plans, Policies and Processes set out by each RHEB take account of the topics covered in both sets of statutory guidance and are sufficient to respond to the issues identified in their own risk self-assessments. HEFCE will provide feedback to individual institutions and to the higher education sector as a whole.

HEFCE will report periodically to the Department for Business, Innovation and Skills (BIS) on the outcomes of the assessments in line with the monitoring cycle, as well as where necessary on an ad hoc basis. HEFCE will regularly publish reports on compliance at a sector-wide level. Data and information used for reporting publicly will be anonymised and will not include information at an individual institutional level.

ARRANGEMENTS

4. IMPLEMENTATION

The University is committed to complying with the requirements of the Prevent Duty to demonstrate ‘due regard to the need to prevent people (staff, students and visitors of the University) from being drawn into terrorism’.

The University has identified and appointed the following internal responsibilities:

- **Gold Level (Strategic)**
Registrar & Secretary (Dr David Duncan), University Executive Board (UEB)
- **Silver Level (Tactical)**
Department of Education (Prof Chris Kyriacou) Academic Representative
- **Bronze Level (Operational)**
Director of Health, Safety and Security (Denis Fowler),
YUSU Chief Executive Officer (Ben Vulliamy).

4.1 Risk Self-Assessment and Action Plan

Using the University's template for assessing risk, a Prevent Risk Self-Assessment has been completed. This follows the themed risk categories outlined within the HEFCE Monitoring Framework for the Higher Education (HE) Sector. The Prevent Risk Self-Assessment and Action Plan form Appendix 1 and 2 of this University Policy and Management Procedure.

4.2 Policies and Procedures

A range of Policies and supporting procedures are in place for managing and mitigating the risks relating to External Speakers and Events Management on campus and institution-branded events taking place off campus. These policies have been reviewed and where appropriate revised to reflect the University's duty to ensure Freedom of Speech on campus and protect Academic Freedom. Links to additional and support policies and procedures are identified within Appendixes 1 and 2 of this University Policy and Management Procedure.

Web links to relevant University's Policy and Management Procedures are available below:

Events Management

<http://www.york.ac.uk/admin/hsas/safetynet/Event%20Management/eventmanagementonline.htm>

Religion, Belief and Non-Belief

<http://www.york.ac.uk/admin/eo/policies/ReligionBeliefNonBeliefStudents.htm>

Facilities for Prayer and Reflection

<https://www.york.ac.uk/students/support/faith/prayer/>

Safeguarding Arrangements

<http://www.york.ac.uk/about/safeguarding/>

Harassment and Bullying

<http://www.york.ac.uk/admin/eo/Harassment/HarassmentGuide.htm>

Equality and Diversity

<http://www.york.ac.uk/admin/eo/index.htm>

4.3 Training

All members of staff and the student community including appropriate visitors etc. will be provided with suitable awareness information, instruction and training with respect to the Prevent Agenda. The University community are encouraged to engage with this awareness training and other appropriate training that could help people from being drawn into terrorism and challenge extremist ideas. Training will include the ability to recognise vulnerability to being drawn into terrorism, and be aware of what action to take in response. This will include an understanding of when to make referrals to the Channel programme and where to get additional advice and support.

PREVENT STATUTORY 2015 – RISK SELF-ASSESSMENT

Section 1: Assessment Overview

Assessment Reference Number	Prevent 001	Version Control	VS1.4
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Name of Assessor	Denis Fowler	Date	01 December 2015
Description of Area/ Procedure/Task being assessed	This document seeks to assess the University's readiness to implement the Prevent Duty under the Counter Terrorism and Security Act (2015). The primary aim is to take steps which will serve to prevent people from being drawn into terrorism.		
Location	University of York including Heslington East, West and Kings Manor.		

Section 2: Persons Affected

Who might be affected by this work? (delete ✓ as applicable)	Staff and Students College Teams Security Services Reception Portering staff Campus Services Open Door Team (ODT) Student Support Services Chaplaincy Team Academic & Teaching Staff External Agencies (Various)	Are any vulnerable groups affected? (delete ✓ as applicable)	University Staff and Student Community	How many people are affected? (delete ✓ as applicable)	16,000 plus students 3,500 plus staff
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Section 3: Review

Date for Next Review of this Document	Date Document Reviewed	Reviewed by (print name)	Signature
July 2016			

Risk Matrix

Hazard Severity Score		Likelihood		Severity \ Probability	1	2	3
Negligible Injury or Damage	1	Unlikely	1	1	LOW	MEDIUM	MEDIUM
Minor Injury or Damage	2	May Happen	2	2	MEDIUM	MEDIUM	HIGH
Major Injury or Death	3	Almost Certain	3	3	MEDIUM	HIGH	HIGH

Description of Hazard		Hazard	Initial Likelihood	Initial Risk	Controls	Residual Likelihood	Residual Risk
1	Ideological challenge of terrorism and the threat faced from those who promote it	3	2	H	<ul style="list-style-type: none"> ▪ Increase the resilience of our University and College communities by encouraging engagement with management, staff and students through training and awareness rising. ▪ Encourage staff training and create opportunities for students which allow grievances to be aired and dealt with. ▪ Ensure that University and College resources are not used by extremist groups. ▪ Continue to work closely with the Students' Union and Graduate Students' Association to provide appropriate debating platforms and work with faith-based societies to provide understanding of diversity of beliefs and cultures on campus. 	1	L
2	Individuals being drawn into terrorism	3	2	H	<p>York was established as a Collegiate University so that Colleges could provide small, interdisciplinary communities within the wider university that support and enrich the University experience for students and staff. This is especially true for the c6,000 students living on campus.</p> <ul style="list-style-type: none"> ▪ Colleges promote and facilitate the exchange of opinion and ideas, and enable debate as well as learning. The Government has stated that it has no wish to limit or otherwise interfere with this free flow of ideas, and that it will be careful to balance the need to preserve national security with protecting civil liberties. It is a long-established principle that Colleges also have a duty of care to their students. Colleges, societies and student groups have a clear and unambiguous role to play in helping to safeguard vulnerable young people from radicalisation and recruitment by terrorist organisations. ▪ Colleges can play an important part in preventing terrorism. Just as they can help to educate students about risk, Colleges can offer opportunities to help students understand the risks associated with extremism and help develop the knowledge and skills to be able to challenge terrorist ideologies. ▪ Channel is a multi-agency initiative that offers help and guidance to people who may be at risk of becoming involved in extremism. Extremist organisations sometimes try to 	1	L

					recruit people who are susceptible or vulnerable, in person or through the internet. If the early signs are spotted and acted upon, it is intended to safeguard the person concerned and help protect others.		
3	Events involving speakers who promote extremism and terrorism	3	2	H	<p>All University Events are managed and approved via the Events Management Online System using a staged sign-off and approval by key stakeholders. All events have an Event Organiser and appropriate arrangements including controls are resourced to support events including:</p> <ul style="list-style-type: none"> ▪ Nominated Event Organiser ▪ Duty Manager (where appropriate) ▪ Security Industry Association (SIA) trained Doorsafe staff ▪ Trained First Aiders ▪ Reception Porters/Security Services. <p>The University has strong values:</p> <ul style="list-style-type: none"> ▪ Believing in tolerance, freedom of expression and equality. ▪ Believing in the rights of individuals to live in freedom from intimidation on the grounds of their protected characteristics (as defined by the Equality Act 2010 and including race, religion, sex and sexual orientation). <p>Freedom of speech is a cornerstone of human dignity:</p> <ul style="list-style-type: none"> ▪ Article 19 of the UN International Covenant on Civil and Political Rights guarantees the right to freedom of expression and freedom of opinion. ▪ Article 20 of the same convention requires the prohibition of “any advocacy of national, racial or religious hatred that constitutes incitement to discrimination, hostility or violence”. Clearly, there is a tension between these two – as a community the University is actively thinking about how it can reconcile them. <p>Staff and students are entitled to make arguments for and against political acts in the UK and in other countries. The University upholds the right to protest but not to intimidate. Above all, the University encourages its members to respect each other and treat others with courtesy and respect.</p> <p>The University expects that where members of our community may share ethnic, religious or other affiliations with individuals or regimes under discussion, no assumption is made that they share the political opinions in question. Where such inferences are made, they can cause distress, anxiety and fear.</p>	2	M

					As a place of learning, research and scholarship, the University favours arguments that are rational and evidence-based. It is essential that the University remains a place where intimidation and fear have no place.		
4	Lack of understanding or awareness of the Prevent Duty Guidelines	2	1	M	<p>Senior Management Group and key stakeholders at the University are actively involved and engaged in the Prevent Statutory Group.</p> <p>The Prevent Statutory Group includes:</p> <ul style="list-style-type: none"> ▪ The Registrar & Secretary ▪ The Pro-Vice Chancellor for Teaching, Learning & Students ▪ Director of External Relations ▪ Director of Corporate Planning & Deputy Registrar ▪ Academic Registrar ▪ Director of Health, Safety & Security ▪ Director of Student Support Services ▪ Chief Executive Officer – Students’ Union (YUSU) ▪ Chief Executive Officer – Graduate Students’ Association (GSA). <p>Termly meetings are held with key stakeholders. Students also have opportunities to raise issues via the Student Life Committee or directly with the Vice-Chancellor.</p> <p>All Heads of College and their College Teams/College Safety Officers (CSO) have received awareness training.</p> <p>Appropriate training will be provided to academic supervisors, chairs of departmental ethics committees and IT officers.</p> <p>All enrolled students at the University are required to attend a mandatory College Welcome briefing including:</p> <ul style="list-style-type: none"> ▪ College Induction and meeting key staff (College Team) ▪ Fire Safety Briefing including river and personal safety (SafeZone App) ▪ Conduct and standards of behaviour ▪ University and College facilities ▪ Interfaith relations and facilities (Chaplaincy) ▪ The Open Door Team ▪ Student Support Services ▪ University’s Counselling and Employee Assistance (CiC) Services for staff. ▪ Information on Prevent and the University’s approach to it. 	1	L

5	Lack of understanding or awareness of the Safeguarding Policies and arrangements	2	1	M	<p>The University Safeguarding Policy and arrangements are available via the link below: http://www.york.ac.uk/about/safeguarding/</p> <ul style="list-style-type: none"> ▪ Safeguarding Policy ▪ Nursery Safeguarding Policy ▪ Widening Participation Safeguarding Policy ▪ York Students in Communities Safeguarding Policy ▪ YSIS Safeguarding Policy ▪ YSIS and York Communities in Schools DBS procedure. <p>The National Counter Terrorism Policing Headquarters (NCTPHQ), in conjunction with the College of Policing, has developed a general awareness e-learning package for Channel. The package includes information on how Channel links to the Government's Counter-Terrorism Strategy (CONTEST) through the Prevent strategy, guidance on how to identify people who may be vulnerable to being drawn into terrorism, and how to refer them to the Channel process.</p> <p>Case studies are included to increase understanding of Channel; these explain how to identify and refer vulnerable individuals to the process. Additionally, information is provided on how to identify appropriate support for the individuals concerned.</p> <p>The training can be accessed at the following URL: http://course.ncalt.com/Channel_General_Awareness</p>	1	L
6	Members of the University community or visitors accessing illegal websites which promote extremism or terrorism, or	2	1	M	<p>The Directorate of Information which includes IT Services has defined and published policies and arrangements for Information Security, Use and Storage including Data available via the links below:</p> <p>http://www.york.ac.uk/about/departments/support-and-admin/information-directorate/information-policy/</p> <p>http://www.york.ac.uk/about/departments/support-and-admin/information-directorate/information-policy/rules/</p>	1	L


	using the University network to promote extremism and terrorism				Details of illegal terrorist and extremist websites will be provided to IT Services by the Further and Higher Education Prevent Officer. Access to these sites will be blocked using the University's filtering software.		
7	Threats to personal safety on campus	2	1	M	<ul style="list-style-type: none"> The Independent newspaper recently voted the City of York the safest city in the UK. The University introduced in January 2015 the CriticalArc SafeZone App which is free to all staff and students with 24/7/365 monitoring by on-site Security Services. All approved and authorised contractors are subject to the University's Approved Vendor and Supplier List, and are required to undergo a Contractor Induction. All contractors must pass the contractor induction. They must display and carry at all times a Contractor Identification and Workflow (Job Ticket). Access Control systems include KAKA and Onity access control card to restricted areas and all accommodation facilities have controlled access arrangements. The campus is covered by CCTV systems subject to SIA monitoring by trained and competent Security Staff via the Security Centre 24/7 365. 	1	L
8	Dissemination of literature promoting extremism and terrorism	2	1	M	<ul style="list-style-type: none"> The University has provided appropriate facilities to all the Student body to circulate and display posters and flyers at various approved locations across the campus (concrete poster points). There are also facilities with Departments and Colleges to allow authorised material to be advertised and displayed (notice boards etc). Regular monitoring is maintained by College Teams, the Student Societies and YUSU, Reception Portering and Facilities Managers/Cleaning staff. Any inappropriate material, including signs of extremist literature, is challenged and removed and may lead to disciplinary action. 	1	L
9	Use of University facilities to promote extremism and terrorism	2	1	M	<ul style="list-style-type: none"> All facilities for room/venue bookings are arranged and approved via the Directorate of Estates and Campus Services (Accommodation Office – Room Booking Services) DECS Facilities Managers, Security Services and Reception Coordinators are key stakeholders. All bookings are subject to the University's Events Management booking arrangements and approvals. Rules on appropriate use of prayer rooms and faith-related facilities are set out in our Policy on Religion, Belief and Non-Belief. 	1	L


10	Lack of scope or skills to discuss and challenge extremist views	2	1	M	<ul style="list-style-type: none"> All external speakers are subject to the Events Management booking arrangements and approvals. Where appropriate, authorised External Speakers are approved by the Registrar via External Relations and Communications Office. 	1	L
11	Failure to liaise and share information with appropriate authorities	2	1	M	<ul style="list-style-type: none"> The Security Manager maintains regular contact with NYP. There are arrangements in place for sharing information, updates and feedback. Key stakeholder Points of Contact are defined and maintained. The University Prevent Strategy lead is the Registrar and Secretary. Local Prevent contact details are defined and maintained. National Prevent contact details via the link below: http://www.safecampuscommunities.ac.uk/guidance/regional-coordinators 	1	L
12	Tensions arise between different groups within the University community	2	1	M	The University maintains monitoring arrangements with all Student Bodies. YUSU and GSA have representation on a number of University Committees including the Health, Safety and Welfare Committee, Crime Reduction Meetings and Student First. There is regular consultation and engagement with the student body and close working relationships are maintained with Student Support Services, the Open Door Team and Night Line.	1	L
13	Failure of YUSU and/or GSA to fulfil their responsibilities	2	1	M	There is regular consultation and engagement with the Student body and close working relationships are maintained with Student Support Services, the Open Door Team and Night Line.	1	L
14	Handling or manufacture of dangerous substances on campus	2	1	M	Legal compliance with respect to the procurement, safe storage, handling, use and disposal arrangements of dangerous and hazardous substances are defined and maintained. Departments have local control arrangements in place and science laboratories and workshops are monitored for compliance internally and externally. http://www.york.ac.uk/admin/hsas/safetynet/COSHH/coshh.htm	1	L
15	Failure to respond appropriately to a serious incident	2	1	M	The University has defined Business Continuity and Incident Management arrangements which are tested on a regular basis. There is a Major Incident Response Team (MIRT) and escalation matrix for Emergency Contacts. http://www.york.ac.uk/admin/hsas/safetynet/atoz.htm	1	L

Definitions:

- An ideology is a set of beliefs.
- Radicalisation is the process by which a person comes to support terrorism and forms of extremism leading to terrorism.
- Safeguarding is the process of protecting vulnerable people, whether from crime, other forms of abuse or from being drawn into terrorism-related activity.
- Terrorism is an action that endangers or causes serious violence damage or disruption and is intended to influence the Government or to intimidate the public and is made with the intention of advancing a political, religious or ideological cause.
- Vulnerability describes factors and characteristics associated with being susceptible to radicalisation.
- Extremism is 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.

Section 5: Assessment Sign-Off

Assessor's Signature		Position	Director of Health, Safety and Security
Print Name	Denis Fowler	Date	21 January 2016
Additional Comments	This Self-risk Assessment will be maintained under review and updated as appropriately.		

Assessment Agreed		Position	Registrar and Secretary
Print Name	David Duncan	Date	21 January 2016
Additional Comments			

Appendix 2
Management Procedure
Prevent Statutory Duty
Action Plan

Serial	Observation or Non-conformity	Assessment Reference	Priority	Owner	Comments Corrective Actions	Target Date Due	Progress %	Date Completed
1	<p>Increase the resilience and understanding of our University and College communities by encouraging engagement with management, staff and students through training and awareness rising.</p> <p>████████████████████ Prevent Team ██████████ North Yorkshire Police facilitated the Prevent Team - Workshop Raising Awareness of Prevent (WRAP) Training.</p>	1	Q	KOS	<p>Ensure all relevant staff and key stakeholders receive appropriate awareness training.</p> <ul style="list-style-type: none"> ■ Senior Management Group ■ Student Support Services ■ College Teams ■ Open Door Team ■ Security Services ■ Reception Porters/Cleaners ■ Student's Union and GSA. <p>Workshop for Raising the Awareness of Prevent (WRAP 3) Training scheduled and booked.</p>	<p>10/10/2015</p> <p>13/01/2016</p>	<p>100</p> <p>100</p>	<p>01/12/2015</p> <p>13/01/2016</p>
2	Lack of understanding or awareness of the Prevent Duty Guidelines.	4	1	ME	<p>All new arrival students in residential accommodation are required to attend a mandatory Fire and Personal Safety Briefing as part of their College Welcome and Induction.</p> <p>We will also implement a coherent communication plan to ensure consistency of message in relation to Prevent.</p>	10/10/2015	100	29/11/2015

Serial	Observation or Non-conformity	Assessment Reference	Priority	Owner	Comments Corrective Actions	Target Date Due	Progress %	Date Completed
	Provide access to appropriate facilities and training materials for staff and students.	4	1	DF	The National Counter Terrorism Policing Headquarters (NCTPHQ), in conjunction with the College of Policing, have developed a general awareness e-learning package for Channel. The package includes information on how Channel links to the Government's Counter-Terrorism Strategy (CONTEST) through the Prevent Strategy. Available via URL: http://course.ncalt.com/Channel_General_Awareness This will be available via the LMS/VLE.	01/09/2015	100	08/09/2015
3	Lack of understanding or awareness of the Safeguarding Policies and arrangements.	5	Q	JE	Undertake a review of the current Safeguarding Policies to ensure that they remain appropriate and up-to-date, taking into consideration the duties outlined within the Prevent 2015 Guidance.	25/09/2015	100	09/12/2015
4	Members of the University community or visitors accessing illegal websites which promote extremism or terrorism, or using the University network to promote extremism and terrorism.	6	1	HFK	Ensure that testing arrangements to confirm the IT System Security arrangements remain suitable and sufficient.	30/11/2015	100	08/01/2016
5	Threats to personal safety on campus.	7	3	DF	Ensure that all staff and students are aware of the SafeZone Application and its capabilities.	10/10/2015	100	20/11/2015
6	Use of University facilities to promote extremism and terrorism.	9	3	MB	Maintain and monitor space usage and room bookings for possible links that may promote extremism of terrorism; assess and rate risks associated with any planned events.	31/01/2016	100	29/02/2016

Serial	Observation or Non-conformity	Assessment Reference	Priority	Owner	Comments Corrective Actions	Target Date Due	Progress %	Date Completed
7	Lack of scope or skills to discuss and challenge extremist views.	10	2	DF	Undertake a review of the University Policy and Management Procedure for Events Management to ensure it is appropriate and takes into consideration the Prevent Statutory Duty with respect to External Speakers etc.	18/12/2015	100	12/01/2016
8	Risk of research work being used to promote extremist views	6	2	DJD	Ensure that all proposed research projects are reviewed by the ethical review process	31/03/2016	75	

Priority Key:

Key	Action Level	Timescale
Q	Quick Win Action (Requires minimal effort and resources to achieve compliance).	14 days
1	Immediate Action, Short Term (High) within 28 days of formal receipt of the Audit Report.	28 days
2	Medium Term (Moderate) within 2 months of formal receipt of the Audit Report.	60 days
3	Long Term (Low) by the next Audit or agreed date with the HoD and Audit Team Lead Auditor.	By arrangement

Owner Key:

Key	Owner	Appointment
DJD	David Duncan	Registrar & Secretary
DF	Denis Fowler	Director, Health, Safety and Security Department
ME	Mick Elliott	Deputy Director, Health, Safety and Security Department & University Fire Safety Officer
GB	Geoff Brown	Security Manager
PQ	Peter Quinn	Director, Student Support Services
JE	Jill Ellis	Deputy Director, Student Support Services
HFK	Heidi Fraser-Krauss	Head of IT Services
KOS	Kate O'Sullivan	Director, Learning and Development
■	■■■■■■■■■■	Health and Safety Officer (Training)
MB	Matt Burton	Head of Space Management

Authorised by: Senior Management Group

UK Provider Reference Number: XXXXXXXXXX

Serial	Factor in the Prevent Duty Guidance	Risk Self-Assessment Rating (A-E)	Comments
A	Arrangements for Senior Management and Governance oversight of the implementation of the institution's Prevent Duty obligations and engagement with Prevent partners.	A	<p>The University's governing body is the Council. The Council will receive a general briefing on Prevent on 26 February 2016 and will be asked to approve the annual statement at its November meeting.</p> <p>The Audit Committee will also maintain a watching brief over this issue; members of Audit Committee have already received a briefing on Prevent from the Registrar & Secretary.</p> <p>While Council assumes a monitoring and oversight role as the governing body, it delegates the operational running of the University to the Vice-Chancellor.</p> <p>The Vice-Chancellor undertakes his responsibilities with the support of his senior colleagues who meet twice a month as the University Executive Board (UEB). The Board will receive quarterly updates on Prevent.</p> <p>The Board assists the Vice-Chancellor in overseeing the strategic direction for the University and delivering its vision. The Board ensures there is effective leadership, management and co-ordination of all the major academic and support activities including the implementation of the University's obligations with respect to the Prevent Duty.</p>

Serial	Factor in the Prevent Duty Guidance	Risk Self-Assessment Rating (A-E)	Comments
B	Prevent Risk Self-Assessment.	A	<p>A Prevent Risk Self-Assessment was initiated following the introduction of the Prevent Statutory Duty in July 2015. The Risk Self-Assessment has been compiled following receipt of the Universities UK (UUK) guidance and modified following the publication of the Monitoring Framework for the Higher Education Sector published by the Higher Education Funding Council of England (HEFCE).</p> <p>The Risk Self-Assessment has been circulated to all internal key stakeholders and was last reviewed and updated in January 2016. The Risk Self-Assessment was adopted and approved by the University's Health, Safety and Welfare Committee (HSWC) on 27 October 2015 and the University Executive Board on 19 January 2016.</p>
C	Action Plan in response to the Risk Self-Assessment.	A	<p>An Action Plan has been developed and is maintained to address identified observations and/or non-conformities. The Action Plan will be reviewed and updated in conjunction with the Risk Self-Assessment. This is a live document and progress will be monitored and reviewed on a regular basis.</p>
D	Arrangements for engaging with and consulting students on the provider's plans for implementing the Prevent Duty.	A	<p>The University has identified and appointed the following internal responsibilities:</p> <ul style="list-style-type: none"> ■ Gold Level: (Registrar & Secretary (Dr David Duncan), University Executive Board (UEB) ■ Silver Level: Department of Education (Prof Chris Kyriacou) Academic Representative ■ Bronze Level: Director of Health, Safety and Security (Denis Fowler), YUSU Chief Executive Officer (Ben Vulliamy). <p>Regular meetings about Prevent are held with the above key stakeholders.</p>

Serial	Factor in the Prevent Duty Guidance	Risk Self-Assessment Rating (A-E)	Comments
E	Training appropriate staff about Prevent Duty.	A	<p>The National Counter Terrorism Policing Headquarters (NCTPHQ), in conjunction with the College of Policing, has developed a general awareness e-learning package for Channel. The package includes information on how Channel links to the Government's Counter-Terrorism Strategy (CONTEST) through the Prevent Strategy.</p> <p>The University has arrangements to ensure that appropriate awareness training is available and accessible to empower staff and students. Staff have access to the Learning Management System (LMS) that is maintained by Human Resources, Learning and Development. Students have access via the Virtual Learning Environment (VLE); both systems are fully auditable.</p> <p>Key roles have been identified and nominated for the awareness training; this is defined as mandatory training and is monitored on a regular basis. Refresher training will be completed on a two yearly basis.</p> <p>A workshop for Raising the Awareness of Prevent (WRAP 3) Training was completed in January 2016.</p>

Serial	Factor in the Prevent Duty Guidance	Risk Self-Assessment Rating (A-E)	Comments
F	Arrangements for sharing information internally and externally about vulnerable individuals, where appropriate.	A	<p>The University is committed to effective partnership arrangements through regular communications, meetings and engagement with both internal and external agencies. Key stakeholders include (but are not limited to):</p> <ul style="list-style-type: none"> North Yorkshire Police (NYP) & Counter Terrorism and Security Team (CTSA) Prevent Implementation Board, City of York Council (CYC) Local and National Prevent Co-ordinators Community Safety Partnerships & Higher York Partnership Association of University Chief Security Officers (AUCSO) Safer Campus Communities All internal University stakeholders (Senior Management Group, Student Support Services, College Teams and Security Services) York University Students' Union (YUSU) Graduate Students' Association (GSA) The Chaplaincy team Other faith leaders.
G	Policies and procedures for approving external speakers and events on Campus.	A	<p>The University recognises its management responsibilities for the risks and hazards associated with Events Management (EM). The University will ensure that all relevant control measures are introduced and implemented to prevent injury or harm to those involved in EM.</p> <p>The University's Policy and Management Procedures for Events Management were reviewed and revised in December 2015 to ensure compliance with the Prevent Statutory Duty, including the arrangements for External Speakers. The Policy is approved by the HSWC and will be reviewed at least every two years.</p>

Serial	Factor in the Prevent Duty Guidance	Risk Self-Assessment Rating (A-E)	Comments
H	Code of practice for ensuring freedom of speech within the law on the provider's premises, including (if applicable) those of the students' union (if not covered in the external speakers and events policies).	A	<p>The Code of practice for ensuring Freedom of Speech and Academic Freedom within the law on the provider's premises is embedded within the University's Policy and Management Procedures for Events Management.</p> <p>Policies and procedures for approving branded events taking place off campus and information sharing are embedded within the University's Policy and Management Procedures for Events Management.</p> <p>http://www.york.ac.uk/communications/</p>
I	Arrangements to protect the importance of academic freedom (if not covered in the external speakers and events policies).		
J	Policies and procedures for approving branded events taking place off campus (if not covered in the external speakers and events policies).		
K	Arrangements for sharing information about external speakers with other providers, where legal and appropriate (if not covered in the external speakers and events policies).		
L	Arrangements for ensuring sufficient pastoral and chaplaincy support for all students (including arrangements for managing prayer and faith facilities).	B	<p>The chaplains (Anglican, Methodist and Roman Catholic) actively work to support the sense of community on campus and can be contacted by students of all faiths and none. The Chaplaincy to the University provides and actively encourages the use of spaces and opportunities for reflection, listening, exploration, confidential support, prayer, worship, meditation and socialising.</p> <p>Whatever an individual's position on faith, their situation, nationality, gender, sexual orientation or role within the University, the chaplains offer individual and group advice, support, and friendship.</p> <p>External advice is sought in relation to denominations and faiths which are not represented on the chaplaincy team.</p>

Serial	Factor in the Prevent Duty Guidance	Risk Self-Assessment Rating (A-E)	Comments
M	Policies for the use of the provider's computer facilities (hardware, software, networks, social media), to include consideration of filtering arrangements and of academic activities that might require online access to sensitive or extremism-related material.	B	<p>The Directorate of Information Services has defined and published Policies and arrangements for Information Security, Use and Storage including Data available via the links below:</p> <p>http://www.york.ac.uk/about/departments/support-and-admin/information-directorate/information-policy/</p> <p>http://www.york.ac.uk/about/departments/support-and-admin/information-directorate/information-policy/rules/</p> <p>Details of illegal terrorist and extremist websites will be provided to IT Services by the Further and Higher Education Prevent Officer. Access to these websites will be blocked using the University's filtering software.</p> <p>A memorandum approved by the Registrar & Secretary was circulated to all staff and students in November 2015 to set out our approach and raise awareness of the above.</p>
N	Arrangements for engaging with Students' Unions and Societies, which are not subject to the Prevent Duty but are, expected to co-operate with their institution.	A	<p>Close working relationships are maintained between the University, Students' Union and Graduate Students' Union. Regular meetings and information sharing is commonplace, including that related to events and external speakers. All parties follow the University's Policy and Management Procedures for Events Management.</p>

Rating Scale:

- A Arrangements, including documented policies and procedures, are in place and have been reviewed and updated as necessary to reflect the statutory Prevent guidance. Where appropriate, they have been formally approved. They are active.
- B Arrangements, including documented policies and procedures, are in place, but need to be reviewed against the statutory Prevent duty guidance, updated as necessary and, where appropriate, formally approved.
- C Arrangements, including documented policies and procedures, are in preparation.
- D Arrangements, including documented policies and procedures, have not been prepared yet.
- E This factor does not apply, so arrangements are not in place.