

COU17D018 / COU17A002

Second Annual Report to HEFCE on the implementation of the Prevent duty at the University of East Anglia 1 December 2017

1. Context

UEA's risk assessment is reviewed annually. Overall the risk to UEA is considered to be low but we recognise that it is important not to be complacent. As previously indicated, overall risk is not something that is capable of precise quantification but it is a judgement based on the fact that radicalisation has not had a high profile in the Norwich/Norfolk area or been considered a significant risk over many years, and reflects the positioning of the University in a small conurbation in a largely rural area. As a result, a proportionate response to staff training has been adopted based on the level of risk.

Mr Brian Summers retired as University Registrar and Secretary on 31.10.17. The Acting Registrar and Secretary is now Mr Ian Callaghan who took over as Prevent Lead on 1.11.17.

2. Outstanding Actions from previous submissions

None

3. Staff Training

The key staff groups identified for face-to-face and online training using in-house Workshop to Raise Awareness of Prevent (WRAP) training resource are:

- Student Services – WRAP training is included in all new Student Support Service staff inductions.
- Student Academic Advisors – 30 new Academic Advisors
- Security staff – WRAP training - Security Team– Full Compliance = 28 staff , plus two senior managers = 30 Total

Face to Face training – Workshop to Raise Awareness of Prevent (WRAP 3)

To date the following UEA staff have received WRAP 3 face-to-face training given by a trained member of Student Services Staff:

19 staff from Student Services +1 = 20. Another 15 staff are to be WRAP trained by December 2017.
8 Security staff (Team Leaders) New team leader already undertaken online training; to be WRAP trained by December 2017.
25 Assistant Wardens¹ + 19. New appointments in the 2017-18 academic year to be trained by December 2017.
20 Senior Advisers + 7. Remaining Senior Advisers and new SA appointments to be trained by December 2017.
1 staff member from Human Resources
1 staff member from Centre for Staff and Educational Development.

In the period 1 Aug 2016 to 31 September 2017, 67 people received face to face WRAP training.

In the period 1 October 2017 to 30 November 2017, we anticipate a further 35 people have signed up for face-to-face WRAP training.

- a) New Academic Advisers are now instructed to attend a 2-hour UEA Centre for Staff and Educational Development (CSED) Adviser training session. This is bespoke training written by David Thurkettle, the Manager of Student Services and delivered each year to staff. Currently UEA offers 3 annual training sessions through the CSED programme, but also runs ad hoc training to advisers in Schools on request by either the Senior Adviser or Head of School. This training includes a section on Prevent and as part of this advisers are asked to discuss Prevent related scenarios prepared by Student Services.
- b) Last academic year, a Prevent session with all staff in the School of Politics, Philosophy, Language and Communication Studies as part of their annual staff development day was trialled. This was very successful as it was an effective way of delivering training en masse. Approximately 50 staff attended which included the Head of School. It is hoped to offer something similar to other schools as required. This year Student Services are working with Faculty Managers to ensure that a timetabled Prevent session is booked into academic colleagues calendars each year. This will mean that Student Services can deliver the training to more staff annually.
- c) Prevent training has been included in the induction of new staff in SSS, including the Assistant Wardens, and it is hoped to roll this out to other central services over the year.

¹ Assistant Wardens/formerly Senior Residents are experienced students who live on campus and provide advice, guidance and support to students living in University residences.

d) Internal on-line module

The Student Academic Advisers' on-line module includes a number of Prevent training scenarios and a link to choose one of two options; the Safe Guarding under Prevent online course or to attend WRAP 3 training. Our systems still do not provide information on the numbers who have actually completed the training and we are seeking to address this point for future monitoring purposes. The University has recently decided to invest in software improvements to enable better monitoring and enforcement of mandatory training across the University.

A new online module titled "Safeguarding Under Prevent" went live in November 2016. All Academic staff, Security staff, Student Services staff, HR managers, and Students Union staff are auto-enrolled on the module from their HR record; cleaning supervisors and managers are also enrolled.

Annual awareness updates to all staff are used to communicate more widely on the Prevent duty, the need to report concerns and the mechanisms for doing so. The Registrar wrote to all staff in December 2015, December 2016 and a further communication is planned for early December 2017.

Members of UEA Council are updated annually on the University's implementation of the Prevent duty and a briefing is also included in the induction for new members of Council. Further training for Members of Council, ET and the new Acting Registrar Ian Callaghan is planned for later in 2017/early 2018.

Additional relevant training related to safeguarding

Training from Norfolk Constabulary on Multi-Agency Safeguarding, FGM, Forced Marriage and Honour-abuse for Student Support Staff in August 2017.

Training from Norfolk Constabulary on Multi-Agency Safeguarding, Sexual Assault and Rape, and Hate Crime, for Resident Warden Team in September 2017.

3. Active and effective implementation of Prevent-related policies including:

i) External Speakers and Events

Policies and procedures for approving external speakers and events on campus are well established and are included in the Code of Practice for ensuring Freedom of Speech² on campus, which has been reviewed and updated to reflect Prevent guidance, and the Speakers and Events Policy and Escalation. The process has been undergone a full review in 2017 with recommendations for adaptations to the 'on line' room booking system being scheduled with our IT department.

External Speakers Data Analysis - Period August 2016 to 31 July 2017

	Aug	Sep	Oct	Nov	Dec	Jan	Feb	Mar	Apr	May	Jun	Jul	Totals
Number of External Speakers	2	12	49	112	41	89	237	187	56	187	163	63	1198
Number of Events	2	9	46	98	37	55	237	109	42	136	59	36	866
Number Escalated for higher authority	0	0	0	0	0	1*	1**	0	0	0	0	0	2

*Last year we indicated that the University was notified of potentially controversial Muslim speaker [details redacted] by the Students' Union at a very early stage, as part of his national tour. A comprehensive risk assessment was completed to ensure freedom of speech with robust debate and challenge. This UEA event was not pursued by the speaker in 2016 but we were advised that it was likely to be rescheduled in 2017. This finally took place in February 2017. As part of the UEA risk assessment process by the Students Union it was noted that the speaker had visited other universities including York, Brunel, Warwick, Exeter and Leeds where control measures were put in place and no serious issues were experienced. Therefore a number of measures were put in place at UEA to mitigate against the risks, including the appointment of a neutral Chair to keep discussions in line with the topic, restricted access (staff & students only), attendance by a senior member of staff on behalf of the Registrar, social media was monitored, the event was recorded by UEA and there was a low-level presence by UEA Security. In the event, the talk went well, attendance was not unusual, content was non-controversial and there were no related incidents.

² <https://portal.uea.ac.uk/documents/6207125/7465906/Section+3+Code+of+Practice+-+Freedom+of+Speech.pdf>

**The other referred event took place in January 2017 – [details redacted]-Solidarity Campaign. Permission was granted, after assessment at low risk, special measures were required to reduce risk including appointment of neutral Chair, the event was to be recorded, restricted access (Staff & Students only). In the end the event did not go ahead, for reasons unrelated to the risk assessment process.

We judge that processes around external speakers at UEA are robust and the measures put in place to enable controversial speakers to hold events on campus have worked effectively and enabled such events to proceed safely.

Student Engagement - Students Union

Whilst the NUS nationally and the Students Union locally are officially opposed to the Prevent duty, UEA Students Union attends the University's Prevent Group and the Union itself has a robust policy on external speakers based on the model issued by NUS and UUK.

In accordance with the University's Code of Practice on Freedom of Speech, the Students' Union operates its own arrangements for reviewing activities and bookings on University premises made by its officers, staff, clubs and societies such that steps are taken to prevent speakers from:

- inciting hatred, violence or call for the breaking of the law;
- encouraging, glorifying or promoting any acts of terrorism including individuals, groups or organisations that support such acts;
- spreading hatred and intolerance in the community and thus aiding in disrupting social and community harmony;
- insulting other faiths or groups (within a framework of positive debate and challenge)

The policy includes a provision that refers all speakers into a risk assessment process, and any speaker that may pose a risk is subject to an investigation.

In making recommendations the investigation will assess risk on the following basis:

- a. The potential for any decision to limit freedom of speech as per the university's code of practice in pursuance of the 1986 Education Act
- b. The potential for the event going ahead to cause the union to be in breach of its equal opportunities policy
- c. The potential for the event going ahead to cause the union to fail in its wider legal duties
- d. The potential for the event going ahead to cause reputational risk to the Union

- e. The potential for the speaker's presence on campus to cause fear or alarm to members of the student body
- f. The potential for the speakers presence on campus to give rise to breach of peace

It may make any of the following recommendations:

- a. On the basis of the risks presented to not permit the event with the external speaker to go ahead
- b. On the basis of the risks presented to fully permit the event with the external speaker to go ahead unrestricted
- c. On the basis of the risks presented to permit the event with the external speaker to go ahead on the basis of regulatory steps designed to reduce risk

Regulatory steps designed to reduce risk may include:

- a. Requiring that the event be filmed by an independent body
- b. Requiring that the event be observed by union, university or third party officials
- c. Requiring that the event be stewarded or subject to security on the door
- d. Requiring that an event promoting a particular view includes an opportunity to debate or challenge that view
- e. Requiring that an event closed to society members only be opened to all members of the union
- f. Requiring that a copy of any speech to be delivered by the speaker be submitted to the union
- g. When considering any regulatory steps designed to reduce risk, their potential to in and of themselves cause risk (for example, the sense of oppression felt by the imposition of security on the door) should be taken into account.

As indicated above, we judge that the processes around external speakers at UEA (both Student Union and wider University) are robust and the measures put in place to enable controversial speakers to hold events on campus have worked effectively and enabled such events to proceed safely.

ii) Operation of Welfare Policies including Partnership and Leadership

The Council of the University has stated its commitment to delivering the Prevent duty. The Executive Team take overall responsibility, advised by a small Prevent Group chaired by the Registrar & Secretary as Prevent Lead. The Prevent Group regularly meets 3 times during the year, and small sub-groups are convened to discuss specific issues such as forthcoming events as needed.

The Director of Student Services chairs UEA Students' Safety Group which includes representatives from Norfolk Constabulary and from Norwich City Council amongst others. The Head of Campus Support and the Director of Student Services maintain routine contact with the Police Authorities and the Prevent Regional Coordinator.

The Head of Campus Support is linked in to other UK HEIs through the Association of University Chief Security Officers (AUCSO) and the Director of Student Services through the Association of Managers of Student Services in Higher Education (AMOSSHE).

The Guidance on Religious Activities and Observance on Campus has been updated including the provisions for the management of facilities for religious observance, and has been reviewed by Council.

Director of Student Services and the Head of Student Services have had two meetings this year with the Prevent Coordinator, Mark Osborn. The Head of Student Services has met regularly with the Prevent Coordinator this year and continues to meet monthly with Special Branch contacts.

Student Support Service hosts a monthly Community Safety meeting chaired by the Head of Student Services.

Director and Head of Students Services have continued to attend regular CCSP meetings.

The Head of Student Services sits on the Norfolk Community Relations Equality Board (CREB).

Franchise Partner institutions: the situation remains unchanged from last year. Whilst UEA has validated provision at Further Education colleges, we have no franchise partner institutions.

No students have been referred to Channel this year.

iii) IT acceptable-use policies and approach to web filtering in relation to the Prevent duty

The University's established policies have been reviewed in light of the Prevent guidance. Access to a small number (14) of extremist web sites including some Islamic and White Supremacist sites have been blocked on the advice of the previous Prevent coordinator. Access can be given to legitimate researchers upon request.

In our judgement there is a tension between blocking access and monitoring access that needs to be considered further. Blocking access to websites may simply push the activity on to other network providers meaning we would not be able to readily monitor potential access. Allowing free access, but monitoring a defined set of websites is probably more within the spirit of the Prevent duty as it allows the University to identify people potentially at risk of radicalisation.

Whichever approach is adopted, the key issue is how we keep up to date on which sites should be monitored / blocked in a rapidly changing environment. We considered the JISC curated list that can be used either with a blocking service that they provide or that can be used with internal tools. As noted in last year's report we were exploring options for running a monitoring service in house (due to concerns around the performance impact of a cloud hosted service). We have now concluded our investigation into web monitoring and at the Prevent Group meeting of 7 February 2017 decided against investing in any technical solutions to filter or monitor web traffic at this time. This decision was taken because it was considered too early to determine what value would be derived from monitoring systems. It had been noted that it was relatively simple to access material in other ways. The decision on web filtering is to be kept under review.

The University actively monitors social media where the University is referenced.

The University's acceptable use policy (known as Conditions of Computer Use or COCU) is subject to annual review. It was reviewed in the Spring of 2017 and an updated version was approved at committee in June 2017. No further changes to the wording of acceptable use as it relates to the Prevent duty were proposed. (COCU was first updated for the Prevent duty for the 15/16 academic year.)

A copy of COCU is available from <https://portal.uea.ac.uk/documents/6207125/6476835/cocu-pdf.pdf/>

All new IT account holders are directed to COCU and asked to agree to abide by their terms. Each year all staff and students are informed of the review and update to COCU. Incidents brought to the attention of the IT service are investigated and where relevant users are directed to COCU where behaviours indicate an infringement. During 16/17, no incidents relating to the Prevent duty were brought to the attention of the IT service.

iv) Pastoral care/Multi faith Groups

The University has a strong multi-faith Chaplaincy team already in place but has agreed resources to further strengthen this in areas where there is a less established infrastructure of support from the mainstream churches. During 2016 we considered the appointment of a new Muslim Chaplain (as our current Muslim Chaplain also works part-time at Norwich Prison) but have instead decided to augment the

current incumbent's services, on the advice of Special Branch, with a number of additional trained members of the Muslim faith. This arrangement has been kept under review during 2017.

Last academic year, Director of Student Services Jon Sharp set-up and chaired a new Faith working group to look at Islamic faith provision. The group membership includes students and staff. The group will meet regularly and it has recently been decided to include a Pro-Vice-Chancellor as Chair.

Student Services meets regularly with all the Chaplains from the Multifaith Centre including with the Islamic Chaplain last year. Matters relating to the Prevent agenda are discussed at the meetings.

9. Areas of Good Practice or where further support may be required – Sensitive Research

In our view it would be helpful if further advice could be given in the area of sensitive research, for example some special dispensation or official arrangement for legitimate academic researchers into radicalisation/extremism to be able to access extremist websites without possible criminal consequences. At present we know of two cases where PhD students wished to research such areas but we had to advise them not to, in view of the advice received from Special Branch (see below). Given that radicalisation/extremism is an area that would potentially benefit from further research into motivation and drivers etc, further advice on this area from HEFCE would be helpful.

In 2016, following the Registrar's all-staff email, the Registrar's office was notified by an academic member of staff a case of a Masters student planning to undertake legitimate research into why western women are attracted to join ISIS. The student hoped to be able to download material from the ISIS website. We sought advice from special branch (Andrew Hill) and the National Counter Terrorism Policing HQ and were advised that there were no formal agreements or mechanism whereby institutions or individuals could declare that they or their academic staff intended to carry out research deemed to be highly sensitive and that they or the institution would be able to confirm that they judged the research to be legitimate academic activity:

“There is no precedent that we know of that enables someone to legitimately access what would be proscribed material uploaded by a terrorist organisation for research purposes. Whilst there is a defence in law to s.58 Terrorism Act 2000, you'll see that it applies to someone charged with an offence to then argue that they had a reasonable excuse for holding that information.

We obviously acknowledge the diligence shown in seeking advice prior to starting any such research but because of the above information, we can't advocate access/downloading of this type of information for this purpose.”

This advice was passed to the University's Research Ethics Committee (UREC) who considered the case and reported back as follows:

"... the research depends on accessing material that is covered by the Terrorism Act (2000) and this might be judged to be a criminal offence. Advice from Special Branch indicates that there is no precedent for gaining legal access to proscribed material of this kind. There is no way to get legitimate access, for research purposes, to proscribed material uploaded by a terrorist organisation. In the end it would be for the courts to decide if the 'researcher' had a reasonable excuse for accessing and / possessing proscribed material.

While there may be ethical issues raised by the material of which we are unaware, the main ethical issues concern the safety of the researcher and the responsibilities of the University. Since accessing this material would be, prima facie, a criminal offence, it would place the student and University at unacceptable risk. If the research went ahead the student could face risk of prosecution and might be unable to finish her research and the University would risk being seen to sanction a breach of the law and could be vicariously liable. Given that by design the research involves a potentially criminal act, it would not be covered by insurance. The legal costs could be considerable. My view as Chair of the University's Research Ethics Committee is that the risks to the student researcher and by implication to the University are significant and are not outweighed by the potential benefits that might flow from this MA level research project.

My judgement is that the research should not be approved and the student should be encouraged to find a different and less hazardous way of studying this interesting topic."

This advice was followed and no further issues with this project have arisen.

In 2016/17 there has been one further informal enquiry to the Registrar's office seeking ethical approval for a student to undertake extremist-related research. When the advice above was provided, the supervisor and student agreed not to proceed.

Further guidance on acceptable approaches to research in this area would be welcomed.

10. Risk Assessment

An updated risk assessment is appended as Appendix 1.

**Appendix 1.
Updated Prevent Risk Assessment and Action Plan November 2017**

No	Risk	Indicator	Risk Controls	Action	Prob. Score	Impact Score	Risk Score
1	Students or staff being drawn into radicalisation or extremist activity by influences on and off campus	a) Identified instances or incidents where radicalisation and extremism are evident of linked to personal or group activities. b) Report by students or staff. c) Information provided by Police, Local Authorities or Prevent Regional Coordinator. d) Information from other external sources. e) Press or media. f) Concern expressed for any students through the safeguarding procedure. g) Concern expressed for any staff through general raising of awareness. h) Social media activity.	<ul style="list-style-type: none"> • Commitment to the implementation of the Prevent Duty Guidance at the highest level • Reporting through safeguarding policy and where appropriate to partner authorities and agencies; • On-going support to individuals and groups; • Training of key groups of staff and general raising of awareness; • Effective channel capability. 	Commitment to Prevent compliance by Council and the Executive Team – completed Prevent Implementation Group conducting a regular review of Prevent landscape in the University meeting regularly, reviewing relevant policies and their effective implementation and reporting to the Executive Team – in place Effective mechanisms for regular liaison with Police and Prevent Regional Co-ordinator – in place Training has taken place/planned for: <ul style="list-style-type: none"> • Dean of Students' staff 	1	5	Green - low risk

No	Risk	Indicator	Risk Controls	Action	Prob. Score	Impact Score	Risk Score
				<ul style="list-style-type: none"> Academic Advisors (on appointment and thereafter on a 3-year cycle) Security staff -in place Annual awareness bulletin to advisors and through the staff bulletin to all other staff reminding them of the Prevent Duty, the need to report concerns and the mechanisms for doing so – bulletins issued in Dec 2015, 2016 and due in Dec 2017 Strong pastoral support through multifaith Chaplaincy – in place The current resources providing support and leadership and guidance to Islamic students to be strengthened through additional support for the part-time Muslim Chaplain – ongoing 			

No	Risk	Indicator	Risk Controls	Action	Prob. Score	Impact Score	Risk Score
				<ul style="list-style-type: none"> Safeguarding policies reviewed and updated in the light of Prevent Guidance – completed November 2015 and updated during 2016/17. 			
2	Production, dissemination or access to radical, extremist or terrorism related material or internet resources	a) Use of University IT systems and networks for production and dissemination. b) Print materials in evidence on University property. c) Use of University related or hosted social networking sites for extremist/radical or terrorism related discussion.	<ul style="list-style-type: none"> IT systems can be key word/phrase monitored; University's Conditions of Computer Use policy updated to reflect Prevent guidance. Handing out printed material is a regulated activity at UEA. Non-compliant print materials are removed and reported to relevant authorities; Social networking policy in place; Development of information gathering and monitoring capability in IT systems in line with legal requirements and constraints and University IT security 	JISC written guidance on IT filtering has been considered but not pursued. We will keep this risk as amber. All policies will be kept under review and will be updated in line with new guidance.	3	4	Amber Med risk

No	Risk	Indicator	Risk Controls	Action	Prob. Score	Impact Score	Risk Score
			<ul style="list-style-type: none"> plan. Some websites blocked on the advice of Regional coordinator. Consideration given to blocking anonymization services such as Tor; not favoured at present. 				
3	Access to University site by external influences, speakers	<p>a) Activities, events and meetings identified through the Code of Practice on Freedom of Speech as likely to comprise extremist views.</p> <p>b) Presence of unauthorised speakers on site.</p> <p>c) Reports by students and employees.</p> <p>d) Information from external sources.</p>	<ul style="list-style-type: none"> Application of Code of Practice on Freedom of Speech leading to identification of all activities, events or meetings which may lead to extremist views being expressed and risk drawing people into terrorism and these being prohibited or risk mitigated; Regular security patrols and cctv coverage. 	<ul style="list-style-type: none"> Code of Practice on Freedom of Speech updated to include Prevent Guidance – completed and updated in 2017 Prevent training for Security Staff – in place Effective monitoring of all bookings for activities, events and meetings through a refreshed online booking system - 2017 Policy for the use of all prayer facilities on campus to be reviewed in light of Prevent Guidance – updated 2017 Use of prayer facilities 	1	4	Green - low risk

No	Risk	Indicator	Risk Controls	Action	Prob. Score	Impact Score	Risk Score
				monitored by the Multifaith Chaplaincy Team – completed			
4	Failure to make full and appropriate use of the opportunity for partnership working		•	<ul style="list-style-type: none"> • Oversight by UEA's Prevent Implementation Group and collaboration with the Police, Special branch, Local Authorities, the Regional Prevent Coordinator and other agencies eg Wymondham Police partnership working group – in place. • UEA Head of Campus Support point of contact linked into other UK HEIs through the Association of University Chief Security Officers (AUCSA) – in place • Single point of contact for partner organisations – in place, Student Services 			Green - low risk

Risk Estimates

Probability: 1-5

Impact: 1-5

Green: Low Risk 1-9

Amber: Medium Risk 10-15

Red: High Risk 16-25