



PREVENT DUTY POLICY DOCUMENTATION

1 The Prevent Duty

The Queen's College acknowledges that under Section 26(1) of the Counter-Terrorism and Security Act (2015) it has a duty, when exercising its functions, to have due regard to the need to prevent people from being drawn into terrorism.

In order to discharge this duty this document and a range of other policy and procedural documents have been reviewed by the College PREVENT Working Group and presented for approval by the Governing Body. These documents arise from a risk assessment process which has been reviewed by the Governing Body and are prepared following guidance provided by HM Government, the Higher Education Funding Council (England) (HEFCE) and the Conference of Colleges.

In the light of its risk assessment, the College PREVENT Working Group takes the view that the strength of support arrangements in the College, the character of the College community itself and existing procedures are such as to require only minimal adjustments to its policies and procedures to meet the requirements of the PREVENT duty.

2 Description of relevant aspects of the College

The senior members of the College consist of the Provost and 38 Official Fellows who together constitute the Governing Body. Most of the Official Fellows act as tutors and advisors to the College's students. In addition, the College has 24 Research Fellows whose principal activity is research but who may engage in teaching. The College contains roughly 340 undergraduate students and 170 graduate students. Almost all of the undergraduates (u/g) and about half the post-graduates (p/g) live in College premises either on the main site or in one of its 4 annexes, situated within one mile of the main site. The College has 25 academically related staff working in the offices or library and more than 70 staff concerned with domestic matters (cooks, porters, cleaners, maintenance staff). College Governance is effected through the College Officers, of whom the Senior Tutor, the Tutors for Undergraduates and Graduates, the Dean, the Equalities Officer and the Domestic Bursar are the most relevant to the PREVENT responsibility. They have reporting lines through various college committees to the Governing Body. Student representatives sit on all relevant College Committees, including the Governing Body.

Besides residential rooms and offices, the main site has several small teaching and meeting rooms together with a 120-seat auditorium and a Chapel. The annexes are used solely for accommodation. Access to the main site is controlled at the Porters' Lodge, situated at the entrance, which is manned on a 24/7 basis. The Porters also monitor CCTVs and alarms at all the annexes, 2 of which have residential caretakers. The Porters can choose to report to the University Security Services any breach of physical security at the main College or

annexes. Each student's progress is monitored by a "Moral Tutor" (for u/g) or "Advisor" (for p/g), who is one of the Official Fellows, and will have regular meetings with the student. In addition each undergraduate student typically has at least one weekly academic meeting in a small group with a tutor, who is often one of the Official Fellows. The Dean coordinates several Junior Deans each of whom lives in one of the College's accommodation buildings and who are responsible for welfare and discipline in the College. They undergo Disclosure and Barring Service checks (formerly Criminal Record Bureau, CRB, checks). They and the Dean (the "Decanal Team") have regular meetings. The College has a full-time Chaplain, responsible for the use of the Chapel and available for pastoral matters to all students irrespective of their faith, or none. Students of the College and fellows of the College or other College academic staff who hold university appointments are automatically members of the University and as such are bound by University regulations and policies.

The College supports IT services for students and staff, and has an IT office with three members. Connections to external networks are via the University Network and servers, and every student and staff member signs up to the University policies on IT before being granted access. The IT office coordinates closely with the University Service on any detected breaches of these policies.

Because of the small size, and close-knit nature of the College, and the regular meetings which occur between the senior and junior members, we believe that the chance of students or staff being drawn into terrorism undetected is intrinsically low. External bookings and the planning of events featuring external speakers are monitored as described below and in the risk assessment/action plan. They take place only on the main College site, in a well-controlled environment. We have drawn up policies, described below, to counter any residual threat.

3 Principles underpinning the College's Policy and Procedural Documentation

As an introduction to the College's policy and procedural documents relating to the PREVENT duty the following underlying principles are of paramount importance.

It is to be understood by all Key Individuals, and by the College community as a whole, that principles of free expression, academic freedom, autonomy, confidentiality, privacy, and equality of rights, according to law, provide the overarching context within which the PREVENT duty is to be considered; and that the duty must be implemented in a manner that is proportionate and positively secures and protects those rights

In approving policy and procedural documentation the Governing Body shall ensure that policies and procedures

- secure and protect free expression and academic freedom, recognising the primacy of these values in institutions of higher education.
- secure and protect the rights of academics, students and staff to hold, articulate and act upon their political, religious and ideological opinions at all times, within the law, and subject only to their contractual agreements and terms of employment.
- respect the rights of academics, students and staff to confidentiality and privacy at all times, in the absence of a risk of serious crime or harm to themselves or others, subject only to their contractual agreements and terms of employment.

- are not discriminatory, and secure and protect the rights of all academics, students and staff to equal treatment under the law, regardless of racial or ethnic origin, or religious belief, and which are in the strictest accordance with the Equality Act 2010 and with the Public Sector Equality Duty.
- are proportionate, noting where the risk of individuals being drawn into terrorism is judged to be low, and which remain subject to, and do not undermine, existing rights including under the Education (No 2) Act 1986, the Human Rights Act 1998, the Equality Act 2010 and data protection or other legislation.

The College will provide tailored training to support the implementation of the PREVENT duty in the College context. That training will ensure that practice remains subject to, and does not undermine, the rights of academics, students, staff and visiting speakers under existing law, including the Education (No 2) Act 1986, the Human Rights Act 1998, the Equality Act 2010 and data protection or other legislation.

Key Individuals and Staff in College will receive appropriate training, including rights protection training. The Governing Body will receive an annual briefing, including on its overarching responsibility for rights protection.

4 Leadership

The College's policies and procedures relating to the PREVENT duty are based on a risk assessment template which will be kept under review by the Equalities Committee and amended in accordance with further guidance from HEFCE and the University.

The Equalities Committee will, through its student representatives, involve the student body in the development and annual review of policies and procedures relating to the PREVENT duty.

The Governing Body will commission an annual review from the Equalities Committee to satisfy itself that the PREVENT duty is being implemented in a manner that does not undermine, and secures and protects, existing rights, including to free expression, academic freedom, autonomy, confidentiality, privacy, and equal treatment under the law.

At the time of each annual review the Governing Body shall receive refresher briefing on the PREVENT duty.

Compliance with the PREVENT duty to be included in the College's risk register and reviewed annually by Governing Body when making the annual report to HEFCE.

As detailed below, key individuals have been nominated by Governing Body with specified responsibilities in respect of policies and procedures related to the PREVENT duty. These individuals comprise the PREVENT Working Group.

Provost - PREVENT lead; responsibility for ensuring that the implementation of the PREVENT duties is in accord with the principles and procedures laid out in this document and for communication with external bodies about the PREVENT duty itself.

Dean – responsibility for welfare and for events involving speakers arranged by students

Domestic Bursar – responsibilities associated with non-academic staff, arrangements for conferences and summer schools, and security matters

Senior Tutor– responsibilities associated with academic staff and arrangements for external speakers invited by academic staff

Equalities Officer; responsibility for management of policies on Equality and those relevant to the PREVENT duty.

Domestic Bursar in association with IT Officer; responsibilities associated with IT systems use.

Secretary to the Governing Body; responsibility for the monitoring and reporting arrangements to the Governing Body.

5 Data Sharing and Communications

Where there is a risk of serious PREVENT related crime or a risk of a vulnerable individual being drawn into terrorism, the College PREVENT Lead is to receive information through the University's security service and from the local PREVENT co-ordinator.

In providing this category of information the University security service will operate under in a manner that secures and protects the existing rights of academics, students and staff, including, in the absence of serious PREVENT-related crime or other justifiable concerns, to confidentiality and privacy; and, at all times, to equal treatment under the law.

The PREVENT Working Group will review existing data sharing protocols with other colleges and the University, and update as necessary, including in a manner that secures and protects the existing rights of academics, students and staff, including, in the absence of serious crime or the risk of a vulnerable individual being drawn into terrorism, to confidentiality and privacy; and, at all times, to equal treatment under the law. External referrals can only be made by the Prevent Lead (Provost) and to, or *via*, an appropriate contact in the University (http://www.ox.ac.uk/staff/working_at_oxford/policies_procedures/prevent-duty/key-contacts).

Whilst the College might choose to share information with the University security services on any concerns, the decision on whether to contact law enforcement authorities will remain one for the College to take. Action under the PREVENT duty would only be proposed in respect of serious terrorist criminal activity, where the College already has certain duties. The University Registrar will be the single point of referral by the College to Channel.

6 Student Welfare and Pastoral Care

The key individual with responsibility for student welfare and pastoral care is the Dean. The Dean attends the University Welfare Forum, where information relating to Prevent and good practice is discussed. The Dean is assisted by the Junior Deans. The student support structures in College range more widely than the decanal team. The Nurse provides health and welfare support. The Tutors for Undergraduates and Graduates both provide welfare support, especially in relation to academic difficulties. The Academic Office provides monitoring of academic performance which not infrequently involves consideration of health and welfare issues. The Accounts Office and Domestic Bursar are involved in hardship issues,

managed by the Student Finance Committee, which again have a relationship with welfare concerns. The Porters' Lodge, as the first point of contact in cases of emergency also plays a role in student welfare, as do the Domestic Bursar and Steward.

Where a member of the College identifies a concern in relation to a student they shall report this to the Dean. The Dean will act in a manner that secures and protects the existing rights of students, including, in the absence of serious crime or the risk of a vulnerable individual being drawn into terrorism, to confidentiality and privacy; and, at all times, to equal treatment under the law.

Those responsible for student welfare and pastoral care shall be alive to the risk that students may be less likely to use welfare provision because they perceive it to be linked to the PREVENT duty.

7 Staff Welfare

The key individual with responsibility for non-academic staff welfare is the Domestic Bursar.

The key individual with responsibility for academic staff welfare is the Senior Tutor, assisted by the Academic Office.

Where a member of the College staff identifies a concern in relation to a member of staff they shall report this to the Domestic Bursar. The Domestic Bursar will act in a manner that secures and protects the existing rights of staff members, including, in the absence of serious crime or the risk of a vulnerable individual being drawn into terrorism, to confidentiality and privacy; and, at all times, to equal treatment under the law.

8 Events and Venue Hire

The College regulates event bookings and venue hire under the terms of its Code of Practice on Freedom of Speech. The Code is founded on the central importance of securing the primacy of the right to free expression within the College, and for external speakers, consistent with the Education (No 2) Act 1986 – this relates to events organised by students, staff or external third party hirers of a venue/facilities.

Under the Code of Practice all external speaker events organised by students have to be approved by the Dean. Students seeking a venue within the College shall complete a booking form which, *inter alia*, shall give details of the content of meetings and arrangements made for the conduct of the meetings. In cases of doubt, before giving approval, the Dean will research the background of the speaker using the web and may check against a list of proscribed organisations held by the University Security Services.

Academic staff are responsible for risk-assessing their own events and drawing the attention of the Senior Tutor to any event that might give rise to concerns relating to the Code of Practice on Freedom of Speech and the College's PREVENT duty. Meetings or other activities falling within the academic curriculum are considered to take place within the context of established policies and procedures in operation in the University and The Queen's College on the content and approach to teaching and learning.

The Conference Office is responsible for risk-assessing activities externally booked through it and drawing the attention of the Domestic Bursar to any event that might give rise to

concerns relating to the Code of Practice on Freedom of Speech and the College's PREVENT duty. The contract used by the College will seek from those hiring facilities details of the content of meetings and other activities sponsored by the hirer.

In cases of doubt, before recommending acceptance of the booking, the Domestic Bursar will research the background of the booking organisation using the web and may check against a list of proscribed organisations held by the University Security Services. The following supplements the College's Code of Practice on Freedom of Speech:-

- Only criminal speech is proscribed
- If an event seems likely to cause security concerns, the Provost, advised by the Dean, reserves the right to take steps to address such concerns, such as relocating that event to premises where the safety of all participants can be properly provided for.

9 IT

The use of IT facilities is governed by the policies and procedures established by the University of Oxford which adequately covers most of the issues highlighted in PREVENT. Further work is being undertaken by the University which will result in amendment to regulations which will signal to users of the University's IT network facilities that they must not deliberately create, display, produce, store, circulate or transmit material related to terrorism or extremist ideology in any form or medium except where required for legitimate academic purposes.

10 Faith Matters

The College contains a Chapel of the Established Church and employs a Chaplain to undertake services. The Chaplain is responsible for approval of all events and services to take place in the Chapel.

11 Research

The policy on research ethics governing college-only researchers is that all college-only staff are covered by the University policies on research ethics, which are operated in a manner which secures and protects the existing rights of those researchers, including to equal treatment under the law, and to secure and protect academic freedom.

12 Security

The College has plans relating to physical, personnel and IT security based on those established within the University and as advised by the University security service.

13 Approval

This document, and the risk assessment and action plan which underpin it, is approved by the Governing Body of The Queen's College and, in accordance with HEFCE Circular Letter 02/2016 paragraph 7, the Provost of the College as the institution's accountable officer.