Prevent Duty - Annual Report to HEFCE Appendix i

University of Bristol: Prevent Action Plan

This action plan is intended to be applicable to all University of Bristol students and staff, at all University of Bristol sites, in all reasonably foreseeable circumstances.

Last updated: 11/10/16

Reference	Strategic Theme	Objective	Specific action/s for 16/17	Key drivers	Action owner/s	Target date	Measurable outcomes	Interdependencies	Status	Progress to Date
PC-WS/1	**Welfare and Safeguarding**	Introduce support mechanisms for students vulnerable to radicalisation	Effectively publicise the new supporting students at risk of radicalisation guidance to key student-facing staff with responsibility for welfare e.g. Faculty Education Directors, Senior Tutors and Wardens.	- Student Services review of how the University consistently responds to students at risk. -Prevent legislation places a duty on the University to do this	Student Services Divisional Office	1) Complete	Staff will be aware of how they can seek advice and guidance if they are concerned about the welfare of a student.	Will be included in training delivered to staff	*Complete*	
PC-WS/2		Ensure staff are aware of and trained in support mechanisms for students vulnerable to radicalisation	1) Consider what awareness raising training is relevant and appropriate for student-facing staff of the University and Bristol SU. Plans for this training will be outlined and presented to the Prevent Compliance Group on 28th June 2016. 2) University Security Services staff to receive Prevent relevant training 3) Contract staff in relevant roles (e.g. Mentors and other support workers provided by agencies supporting students with disabilities, and support staff working in Partner organisations like Unite) to receive training 4) Ensure staff that arrange placements for students (for example in industry, schools, hospitals, and at overseas Universities) have relevant Prevent-related information of how to seek help if concerns are raised.	- Good practice - Prevent legislation places a duty on the University to do this.	Student Services Divisional Office	1) A training proposal was approved by the Prevent Compliance Group in June 2016 and elements of it have been delivered already. That proposal has been updated in light of comments from the University's Board of Trustees in October 2016, and will be submitted as part of this the Annual Report to HEFCE 2) Spring 2017 3) Spring 2017 4) Spring 2017	The University takes a decision about the level of risk and which groups of student facing staff should be trained about extremism, radicalisation and terrorism in order to manage that risk and be compliant with the Prevent duty. When developing training, anti-discrimination messages will be included in order to ensure staff do not unwittingly discriminate against members of particular groups and are aware of unconscious bias.		*Good progress*	*A three tiered training strategy has been developed in order to appropriately train staff with differeing levels of responsibility. This strategy was presented to the Prevent Compliance Group detail at the 28th June meeting and approved. Training will be carried out in autumn 2016.*
PC-WS/3		Ensure provision and management of prayer facilities is sufficient	Review existing arrangements for students' prayer and contemplation facilities, and establish policy governing the use of them.	- Good practice - Prevent legislation places a duty on the University to do this.	Director of Student Services and Coordinating Chaplain	1) Autumn 2016	Ensure that the existing effective arrangements for accessing prayer and contemplation facilities for all faiths continues and is improved upon.		*Good Progress*	*A first draft has been completed and circulated to key stakeholders. An Advcanced draft will be submitted as part of the Annual Report to HEFCE*
PC-WS/4		Ensure provision of Chaplaincy support is sufficient	1) Consideration will be given to providing the Multifaith Chaplaincy with additional financial resources, to fund appointments to Chaplaincy staff at the Coordinating Chaplain's discretion. Decisions about Chaplaincy provision will be based on a number of factors which include but are not limited to, proportionality to religious groups within the student population, the strategic issues that are perceived to be of most importance during a given period of time, and the availability of Chaplains from faiths.	- Good practice - Prevent legislation places a duty on the University to do this.	Director of Student Services and Coordinating Chaplain	1) Complete	1) The University will have given proper consideration to its Chaplaincy provision. 2) The Multifaith Chaplaincy concept is strong and should be maintained. It has on occasion been difficult to secure the voluntary participation of representatives from all faith communities. Funding may make recruitment easier.	Requires budgetary approval from senior management	*Complete*	*£5k of additional funds have been made available to the Chaplaincy in 2016/17 to aid recruitment*
PC-WS/5		Ensure appropriate measures are introduced to support staff vulnerable to radicalisation	1) Initiate discussions with the Director of HR and ask them to consider reviewing staff welfare policies and procedures. 2) Ensure HR Managers are given a briefing on Prevent so they can respond to concerns raised with them. 3) Given that the University does not have specific staff welfare policies, we will consider how best to incorporate the raising of Prevent related concerns into rules on staff conduct, before any criminal activity takes place.	- Good practice - Prevent legislation places a duty on the University to do this.	Student Services Divisional Office	1) Autumn 2016	The University will have given proper consideration to its provision for supporting the welfare of staff	The process is dependent on policies currently in existence.	*Good Progress*	*1) The Human Resources Division have been consulted. 2) Details of how welfare cases are currently managed are explained in the main body of the annual report 3) HR Managers will be trained as part of our Prevent training plan 4) A decision remains as to how to incorporate Prevent into rules on staff conduct (Ordinance 28)*

PC-WS/6		Ensure sufficient regard is given to Equality and Diversity legislation when implementing Prevent compliance measures	Ensure reference is made to E&D legislation in any policies/procedures developed in response to Prevent legislation, where appropriate	- Good practice - Recommendation following Mazars audit of University's Prevent compliance readiness	Director of Student Services and Organisational Development Manger (Equality and Diversity)	1) Complete			*Complete*	*The Organisation Development Manager (Equality) is satisfied that work carried out regards Prevent does not contravene the University's E&D policy. In addition, information on unconscious bias will be incorporated into training on Prevent.*
PC-MS/1	**Management of Space**	Ensure events where controversial individuals are speaking are properly risk assessed	1) Complete development of a new Freedom of Speech Statement and External Speakers Procedure (replacing longstanding documents) which acknowledges the University's obligations in legislation.	- The Secretary's Office were in the process of reviewing this prior to Prevent legislation being enacted. - Prevent legislation makes it a requirement	Director of Legal Services	1) Complete	- All are aware of and adhere to the Freedom of Speech Statement and External Speakers Procedure. - The policy operates effectively. - A record of any high level decisions made about external speakers will be kept in order to ensure the process is auditable	Requires final approval from Committee of Senate	*Complete*	*The Freedom of Speech Code of Practice was approved by the Board of Trustees in July and has been submitted to HEFCE*
PC-MS/2		Minimalise possibility that events promoting extremism or supporting terrorism are organised by students off University premises	1) Bristol SU to consider seeking student approval to update the safe space guidance to specifically include events off campus in its remit.		Bristol SU	1) January 2017			*Good Progress*	*At the final Student Council meeting of the academic year a decision was made to replace Bristol SU's Safe Space Policy with an anti-bullying and harassment statement that would sit alongside a new code of conduct. The policy was designed to protect individuals from discrimination, and would apply to events organised on or away from University premises by Bristol SU and its members. The new code of conduct still needs to be ratified.*
PC-MS/3		Ensure that terrorist or extremist related material is not displayed on University premises	Consider whether or not to introduce an overarching policy statement on the suitability of promotional materials displayed on student managed outlets such as noticeboards	- A policy on this could be seen as good practice.	Secretary's Office	1) January 2017			*Slow progress*	*Still at consideration stage*
PC-LE/1	**Leadership and Engagement**	Ensure effective engagement with external agencies on issues relating to Prevent	1) Day-to-day operational management of the University's engagement with Prevent will be conducted by the Student Services Divisional Office. This includes liaising with our BIS Regional Prevent Coordinator and Building the Bridge (the local authority-led group for authorities subject to the Prevent duty). 2) Consideration will be given as to desirability and practicality of an information sharing agreement.		Student Services Divisional Office	1) Ongoing 2) Complete	Arrangements for the management and leadership of the University's engagement with Prevent are clear.		*Complete*	*1) Staff from the Student Services Divisional Office attend regular events hosted, and jointly attended by external partners. We have a formal position on the City Council's Building the Bridge board, where information is regularly shared.* *2) UoB Staff have met with Avon and Somerset Constabulary to discuss this. Currently, the constabulary are unable to set up a formal agreement where information can be shared routinely about individual cases. However, it remains at the discretion of individual Police Officers to share information with us on cases.* *In addition, the head of the Constabulary's Counter Terrorism Intelligence Unit has said they will contact us to let us know if one of our students is a concern.*

Ref	Category	Objective	Actions			Status	Outcome		RAG	Update
PC-LE/2		Ensuring staff are engaged with Prevent in order to aid compliance	1) A Prevent Compliance Group has been established to agree on and oversee the work that needs to be undertaken to ensure the University's compliance with the Counter Terrorism Act 2015. The group comprises of academic and professional services staff, with Trades Union representatives. It is chaired by the Director of Student Services. 2) Formulation and development of policy and practice will be carried out by individual departments with responsibility for specific areas referenced in the duty, with the assistance of the Prevent Compliance Group. 3) The University's senior management engagement with Prevent will be led by the Deputy Registrar (Academic Services). Policy documents will be approved by the University's Board of Trustees. 4) Engage with Bristol SU: both with their representatives on the Prevent Compliance Group and more widely as staff and elected officers. 5) Engage with the UCU and the other Trades Unions. 6) Develop an internal communications strategy to explain our chosen approach. 7) Seek approval for plans through the Board of Trustees and then reported to HEFCE for compliance monitoring.			1) Complete 2) Ongoing 3) Complete 4) Ongoing 5) Ongoing 6) Completed 7) Ongoing	1) The Prevent Complaince Group ensures a range of views are actively involved in the review and development of policy and practice in relation to Prevent 2) Policy and practice will be realistic and achievable as it will be developed by those who are knowledgeable about that area of work. 3) Senior leadership is actively aware of the Prevent duty and has oversight of formal actions in relation to the University's compliance. 4,5,6) Engage effectively with key stakeholders to inform our approach. Once agreed, explain our approach to students and staff to increase its chances of being successful. 7) As the University's governing body, it is important the Board of Trustees has oversight of the University's approach and agree our compliance monitoring submission.		*Good progress*	*1) The Prevent Compliance Group was established in 2015 and has overseen the compliance work undertaken so far and submitted to HEFCE. It's work is now conclcuded.* *2) Policy development remains ongoing.* *3) The Deputy Registrar remains the Senior Management lead for Prevent. Other members of Senior Management will be offered a briefing on prevent as part of the University's training strategy* *4) Bristol SU is represented on the Prevent Compliance Group by the CEO and a full time elected officer. They will be consulted on the content of the annual report to HEFCE* *5) The Vice President of Bristol UCU will be consulted ont he content of the Annual Report* *6) A consultation exercsie with all students and staff on the work the University proposed to submit to HEFCE was carried out in February 2016* *7) Our submission to HEFCE was completed in April 2016, with the Board of Trustees approval.*
PC-IS/1	ICT and online research	Ensure student and staff online safety and academic freedom	1) Complete review of IT policies in relation to Prevent. This might involve adding specific reference to Prevent and accessing terrorist or extremist material in the range of IT policies, or put a reference in each policy to an overarching Prevent Policy. 2) Consider whether to introduce web filtering as requested by HEFCE 3) Update 'keeping safe online' guides for students to explain what terrorist/extremist material looks like, what the University's responsibilities are, how to avoid it and how to raise concerns about fellow students if they consider they are looking at inappropriate material for reasons other than mild curiosity. 4) Using existing School/Faculty Ethics Committees, establish a systematic mechanism for centrally recording if a student is legitimately accessing illegal or sensitive material as part of their research, as per the UUK guidelines.			1) 1 August 2016 2) Complete 3) 1 August 2016 4) 1 August	1) The expectations of staff and students about how they can use the University's IT facilities are clear. 2) A decision is taken whether to introduce filtering. 3) Staff and students know how to raise concerns and understand the process for carrying out security sensitive research 4) Students and staff feel protected and secure if carrying out legitimate security sensitive research.		*Good progress*	*1) Await update* *2) The University has decided on principle to not introduce filtering* *3) Await update* *4) Await update*
PC-C/1	Communications	Ensure the University's reputation is not damaged through linkage to individuals that might support or promote extremism or terrorism	1) Consider whether the University's visual identity guidelines need revision in light of the Prevent Duty. Specifically, it may be helpful to describe when the institution's branding can be used and the responsibilities which come with its use.			1) 1 August 2016	Any references to the University related to potential terrorist or extremist activity that cause concern are referred for advice.		*Slow progress*	*1) Await update*

Prevent Duty Annual Report - Appendix i

University of Bristol Prevent Compliance Risk Assessment 2015-16

This risk assessment is intended to be applicable to all University of Bristol students and staff, at all University of Bristol sites, in all reasonably foreseeable circumstances.

Risk area	Risk owner	Reference code (for cross referencing with Action Plan)	Risk Title	Key factors that would contribute to the risk (contributing factors)	Gross Risk score	Action taken/available to mitigate risk (mitigating factors)	Net Risk score	Warning mechanisms	Contingency Plan	Responsibility	Assurance mechanisms	Date last reviewed
Welfare and Safeguarding	Deputy Registrar	PC-WS/1	Radicalisation of University of Bristol Students	Students could be radicalised by factors internal to the University, and factors external to the University	4-B	The University has a number of policies intended to promote a culture of inclusivity. The supporting students at risk of radicalisation guidance makes clear the potential symptoms and signs that warrant further discussion about whether someone may be at risk. **Proposed Action:** - The Student Services Divisional Office will maintain an operational brief for radicalisation issues and will highlight any new developments to relevant staff. Positive debate about these issues is available from the Multifaith Chaplaincy and Bristol SU. - Where it is possible to intervene to provide effective and timely support to a student, this is likely to mitigate the severity of the impact. - Where a student is radicalised, effective handling of internal communications and external media is crucial and can mitigate the severity of the impact.	3-A	Staff may become aware of students being radicalised either through their own interactions with them, or if the Police contact the University to share their concerns. Guidance has been published to help staff recognise possible signs of radicalistion. This guidance has been based on guidance published by the Association of Chief Police Officers (ACPO).	- Where it is possible to intervene, the Student Services Divisional Office staff are familiar and confident with responding to students at risk. - When a student is radicalised, support from the Communications and Marketing Division to manage the University's response is key.	Deputy Registrar	Annual Report to HEFCE (which is subject to review by the University oard of Trustees)	11/10/2016
		PC-WS/2	Failure of staff to raise concerns about students potentially vulnerable to radicalisation	- Staff are not aware that the cause for concern procedure can be used in relation to concerns relating to terrorism or extremism, and/or do not feel comfortable sharing issues internally - Not all appropriate staff are trained for example disability support workeers provided by agencies. - University of Bristol students become radicalised while on placement or studying overseas	2-C	- Guidance for supporting students at risk of radicalisation has been published. The existing Vulnerable Students Support Service is well known and will be the conduit for concerns. Proposed Action: - Train key staff likely to be the first port of call for concerned colleagues that the supporting students at risk of radicalisation guidance is available, for example by providing training for the Senior Tutors Network, Faculty Education Directors, Faculty Education Managers, Wardens, Security Services etc. - Ensure contract staff like Disability Mentors, and staff supporting students in partner organisations like Unite are appropriately briefed in Prevent - Ensure that our colleagues who are working with placement providers will have relevant Prevent-related information of how to seek help if concerns are raised	2-B	Late notification of students seemingly at risk of radicalisation, where it is clear that staff could have intervened earlier.	The University has published guidance on responding to situations where students have become radicalised. This guidance will be included in training for staff who have pastoral responsibility for students.	Director of Student Services	Annual Report to HEFCE (which is subject to review by the University oard of Trustees)	11/10/2016
		PC-WS/3	Insufficient chaplaincy provision, which could lead to lack of availability of key support for young people.	- Insufficient direction of funds to the multi-faith chaplaincy would contribute to this risk. - Inability to recruit experienced volunteers to act as chaplains.	3-C	- The University has a well regarded Multifaith Chaplaincy with representation of Buddhism, Christianity, Islam, Juadism, and Hinduism, through it's volunteer Chaplains. - Chaplains provide guidance about broader religious issues such as student societies, timetabling, festivals and external events organised by various faith groups, which is valuable. **Proposed Action:** - The University is currently considering making additional funds available to help to ensure continued recruitment of Chaplains representing faiths relevant to the University community.	3-B	Students and staff may complain that facilities and support is not sufficient.		Director of Student Services and Coordinating Chaplain	Annual Report to HEFCE (which is subject to review by the University oard of Trustees)	11/10/2016

Category		Ref	Risk	Cause	Rating	Controls / Commentary	Rating	Risk materialisation	Management	Responsibility	Assurance	Date
		PC-WS/4	Insufficient provision and management of prayer and faith based facilities	- Ineffective management of prayer facilities and a lack of policy governing use - Prayer and contemplation space is not equally accessible for all students and staff .	3-C	The University has a Multifaith Chaplaincy and spaces for prayer and contemplation. Arranging access cannot be done on spec as it requires UCard (University ID card) permissions to be granted but this is straightforward and easily arranged on request. **Proposed Action:** - Review existing arrangements for students' prayer and contemplation facilities. - Establish policy for management of prayer and faith facilities	3-B	Students and staff may complain that facilities and support is not sufficient.			Annual Report to HEFCE (which is subject to review by the University oard of Trustees)	11/10/2016
		PC-WS/5	Radicalisation of University of Bristol Staff	Staff could be radicalised by factors internal to the University, and factors external to the University	4-B	**Proposed actions:** - University does not have specific welfare policies for staff. Instead, welfare concerns are dealt with on a case by case basis by line managers, and escalated to HR Managers where necessary. - Ensure HR Managers are given a briefing on Prevent - Consider inclusion of a line in staff code of conduct about Prevent related concerns, and how they should be reported to HR Managers	4-B			Human Resources Division		11/10/2016
		PC-WS/6	Efforts to comply with prevent inadvertently contravene Equality and Diversity legislation	E&D legislation is not given due regard in carrying out our compliance work	1-A	**Required Action:** Consider how reference to E&D legislation can be incoporated into any policies/procedures developed in response to Prevent legislation, where appropriate						11/10/2016
Leadership and Engagement		PC-LE/1	Failure to appropriately engage with external agencies on issues relating to Prevent		2-B	The Student Services Divisional Office maintains active and productive working relationships with our Regional BIS Prevent Coordinator, the local police and organisations such as the local authority-led Building the Bridge. There isn't currently a formal information sharing agreement in place. **Proposed action:** Discussion with the Information Rights Manager about the desirability and practicality of an information sharing agreement.	2-A	The risk might materialise if staff were unable to attend local Building the Bridge Meetings at Bristol City Council, ceased to engage with events organised by our regional Prevent Lead, neglecting to maintain good relations with relevant partners as a result.	Maintaining relationships with external partners is usually done by the Student Services Divisional Office. The Divisional Office collectively manages this by ensuring responsibility for maintaining links with external partners does not rest with one officer alone.	Head of Divisional Office ensures he and his team share the responsibility of attending meetings and events.	Annual Report to HEFCE (which is subject to review by the University oard of Trustees)	11/10/2016
		PC-LE/2	Non-engagement with Prevent by staff, leading to non or partial compliance.	- The University and Colleges Union and Bristol SU object to Prevent on principle. - Ineffective leadership leading to unintentional non-compliance - Poor communications meaning that the University's approach to Prevent is ineffectively communicated.	3-C	**Proposed action:** -The University proposes to approach Prevent from a safeguarding point of view with the intention that this will help to ameliorate concerns sufficiently, so that if a member of staff is worried about the welfare of a student they will report their concerns through Student Services. -The University has consulted widely with the staff and student body about the University's response, communicating as part of that process the message that its approach to Prevent is intended to be proportionate and welfare-focussed, and explaining how our guidance is intended to support those at risk.	3-B	Conscious non-engagement from the Unions (student or employee) would normally be declared. Non-union sanctioned action would be harder to identify initially and may result in scenarios as described in cell I5.	Incidents of staff members deliberately not carrying out tasks as required as part of their roles should be handled by their manager.		Annual Report to HEFCE (which is subject to review by the University oard of Trustees)	11/10/2016

Management of Space	Director of Legal Services	PC-MS/1	University premises are used to promote extremism or terrorism	Events are hosted at the university which promote extremism or terrorism or which popularise hatred or intolerance of those with particular protected characteristics	3-C	- Current practice has been to manage events on a case by case basis, looking at the various risks associated with any case brought to the University's attention, and managing appropriately, wither by introducing measures to allow an event to go ahead safely, or stopping an event if the risks are too deemed to be too high. - The University has had a Freedom of Speech Code of Pratcice (which includes a statement on Freedom of Speech and an external speakers booking process) for many years. This has now been redrafted and is currently being reviewed by the University's Committee of Senate and it's Board of Trustees before being submitted to HEFCE as part of our detailed submission under Prevent. - The new External Speakers Process aims to systematically manage events by asking event organisers to complete a self-assessment tool that enables them to give consideration to any risk that may be associated with a particular speaker. If the self-assessment process raises concerns the event organiser is required to refer to a senior member of staff. - Bristol SU has a safe space policy and best practice guide.	3-B	The external speaker process should raise warnings about any proposed event at which controversial speakers are due to have a platform.	If an event is hosted that causes controversy, this would be managed between the organiser, the Deputy Registrar and the Marketing and Comunications Director.		Annual Report to HEFCE (which is subject to review by the University oard of Trustees). An auditable trail of decision making should be kept in regard to any high-level decisions made about external speakers.	11/10/2016
		PC-MS/2	The promotion of extremism or terrorism by students away from University premises	Student groups events occur on external premises which promote extremism or terrorism or which popularise hatred or intolerance of those with particular protected characteristics	3-B	- The same issues apply as for University events, and the Bristol SU safe space policy applies. Bristol SU society events held off campus are subject to the same policy but it is reasonable to think that neither the University nor Bristol SU would necessarily be aware of all off-campus events. See previous comments about the process underway to update the existing Freedom of Speech Statement and External Speakers Process. -**Proposed Action:** Bristol SU to consider seeking student approval to update the safe space guidance to specifically include events off campus in its remit.	3-B	The Bristol SU safe space policy	If an event is hosted that causes controversy, this would be managed between the organiser, the Deputy Registrar and the Marketing and Comunications Director.	Director of Legal Services and CEO of Bristol SU	Annual Report to HEFCE (which is subject to review by the University oard of Trustees)	11/10/2016
		PC-MS/3	Extremist or terrorist related material is displayed within college premises	Students who support radical causes could be responsible for this. External individuals and organisations could also target University premises in order to promote an extremist message.	1-C	- There is no overarching policy for the suitability of promotional materials displayed on student managed outlets such as noticeboards. Local rules and arrangements apply, for example in study spaces. - Flyering in Halls of Residence is not permitted without the specific approval of Residences staff **Propsed action:** Consider whether an overarching policy statement is required and take action as appropriate.	1-B	Staff at appropriate levels (such as Wardens) are given autonomy to permit or decline requests to display or promote materials.	Any promotional material deemed to be harmful would be removed.	Director of Legal Services	Annual Report to HEFCE (which is subject to review by the University oard of Trustees)	11/10/2016

Area	Owner	Ref	Risk	Description	Initial Rating	Controls / Proposed Actions	Residual Rating					Date
ICT and online research	Chief Information Officer	PC-IS/1	Access of extremist material online	- Staff and students might access materials relating to extremism or terrorism online for research purposes or for nefarious purposes. - The University network is not filtered.	3-C	- The University has a range of IT policies that include regulations designed to prevent the misuse of University IT equipment and its networks where students and staff connect their own devices. -No web filtering is in place so all users at Bristol have unlimited access to the internet. HEFCE expects that the University should have considered whether to introduce filtering, and to explain its rationale. -The research approval process does not have a central register of researchers legitimately accessing terrorist material for research purposes that would protect them in case of enquiry about their web browsing. **Proposed Actions:** - Include specific reference to Prevent in relevant IT policies at next revision, ready for next academic year. - Web filtering will not be introduced at this time. The rationale is given in the Summary Report. - Consider how a central register of researchers accessing security sensitive material could be easily compiled and maintained in case of query.	3-B			CIO, Assitant CIO, and Head of RED		11/10/2016
Communications	Director of Communications and Marketing	PC-C/1	The University's reputation is damaged by being associated with terrorism and/or extremism.	-Improper use of official UoB Facebook/Twitter accounts. - Current or former staff or students using social media to promote extremist messages with UoB logo attached to their profile - Online/social media communications relating to extremist or terrorist material feature the university's branding	2-B	- The University's Web and New Media Team monitor all official channels but it is prohibitive to consider monitoring all third party channels which might use the University's branding. If any misuse is discovered then appropriate and proportionate action would be taken, dependent on the circumstances. **Proposed Action:** The University's Web and New Media Team will be briefed on Prevent and will know who to discuss their concerns with if any extremist or terrorist material is found to have the University's branding.	2-B	No formal mechanism	The University's Incident and Crisis Management Framework identifies who in the Communiocations and Marketing Division can be contacted in a crisis situation			11/10/2016