

Office for
Students



Monitoring of the Prevent duty

2016-17 progress report and future
development

Reference OfS 2018.27

Enquiries to prevent@officeforstudents.org.uk

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To	Heads of OfS-funded higher education institutions Heads of other relevant higher education bodies
Of interest to those responsible for	The Prevent duty, Governance, Administration, Student services, Information technology, Security, Chaplaincy, Students' unions, Higher education policy, Counterterrorism policy
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Summary

Purpose

1. This report sets out the Office for Students' (OfS's) findings from the annual reports submitted by higher education providers covering activity relating to the Prevent duty for the 2016-17 academic year.
2. It also signals the direction of travel regarding the continuation of monitoring responsibility for Prevent under the OfS.

Background and introduction

3. Since September 2015, all 'relevant higher education bodies' (RHEBs) have been subject under the Counter-Terrorism and Security Act 2015 to a statutory duty to have 'due regard to the need to prevent people from being drawn into terrorism' (referred to as 'the Prevent duty')¹. In fulfilling this duty, they must have particular regard to their existing duties to ensure freedom of speech and consider academic freedom. Further information on how higher education providers should implement the duty is set out in two sets of statutory guidance published by the government².
4. In 2015 the government appointed the Higher Education Funding Council for England (HEFCE) to monitor implementation of the duty across the higher education sector in England, and this role was formally delegated to the OfS when it became operational on 3 April³. Alternative arrangements apply in Wales and Scotland respectively. The Office for Standards in Education (Ofsted) is responsible for monitoring implementation of the duty at further education colleges, including in relation to any higher education provision they offer. While the OfS acts as monitor, the government retains responsibility for imposing sanctions associated with non-compliance with Prevent, and we therefore do not hold any formal powers under the Act.

Monitoring approach to date

5. To demonstrate that they have 'due regard' to the Prevent duty, RHEBs need to:
 - have robust and appropriate policies and processes in place, responding to the Prevent duty statutory guidance
 - show that they are actively implementing and following these policies in practice.
6. To date, as part of an annual monitoring exercise, RHEBs have been required to submit an annual report detailing their implementation of Prevent, data on Prevent training, high-risk events and welfare referrals, and signed declarations from their governing body confirming they have continued to demonstrate due regard to Prevent over the academic year.

¹ The Counter-Terrorism and Security Act 2015 Section 26(1) at www.legislation.gov.uk/ukpga/2015/6/contents/enacted.

² See 'Revised Prevent duty guidance: For England and Wales' and 'Prevent duty guidance: For higher education institutions in England and Wales' at <https://www.gov.uk/government/publications/prevent-duty-guidance>.

³ See the delegation letter from the Secretary of State for Education, available at www.officeforstudents.org.uk/advice-and-guidance/regulation/counter-terrorism-the-prevent-duty/.

7. Where further evidence was needed from a provider, they were required to complete progress plans. Some were also required to undergo a Prevent review meeting to demonstrate compliance. The 'Further evidence needed' category is a temporary judgement, and providers are expected to move into either a 'Demonstrates' or 'Does not demonstrate' outcome category on reassessment.
8. The underlying principle of the monitoring approach to date has been to take a proportionate approach to monitoring providers' implementation of the Prevent duty. The level of evidence required to demonstrate compliance has depended on the context of an individual institution, including factors such as size and compliance history. HEFCE and the OfS have sought to avoid unnecessary burden for providers in continually resubmitting documentation, while providing a robust level of assurance where there are concerns. Learning from experience, and consulting across the sector and with the government, both bodies have continued to evolve and refine the monitoring approach and have aimed to reduce burden where possible.
9. HEFCE published the third iteration of its monitoring approach, 'Framework for the monitoring of the Prevent duty in higher education in England: 2017 onwards' (HEFCE 2017/10), in August 2017. It sets out the current monitoring requirements on RHEBs.

Analysis of 2016-17 Prevent annual reports

10. HEFCE received annual reports for 2016-17 from 315 providers subject to the Prevent duty in England. This document reviews progress based on these reports. Overall **97 per cent of providers** were assessed as **demonstrating due regard** to the Prevent duty at the point of assessment (an **increase of three percentage points** from the previous year). In general, our analysis demonstrates significant progress on the part of the sector in implementing the approaches set out since the start of monitoring in 2015.
11. This document includes a range of case studies of effective practice across the key themes of the Prevent duty guidance, focusing on:
 - assessment of risk
 - welfare
 - events and speakers
 - engagement with local partners
 - co-ordination for Prevent
 - engagement with students
 - training
 - web filtering and monitoring.

The OfS approach to monitoring

12. This report signals the direction of travel regarding the Prevent monitoring function under the OfS. In light of two cycles of annual reporting revealing a high degree of compliance in the

sector, and of the establishment of the OfS, we are taking the opportunity to review and refine our monitoring approach.

13. Building on HEFCE's successful work, the OfS will continue to work closely with the sector, the government and key partners in the implementation of the Prevent duty in higher education. Our engagement strategy with providers will be more risk-based and will reflect individual contexts. We will prioritise engagement with those providers from which we require further evidence of due regard to the duty, or which require further support, for example because they face greater local challenges. We will also continue to review specific areas of Prevent-related practice across the sector, support the sharing of good practice. The new approach will offer greater opportunity for the OfS to undertake these specific area reviews and to work with other stakeholders such as students or multi-agency Prevent partners.
14. We have developed a set of overarching principles and the broad framework that will guide the OfS's strengthened, risk-based approach to monitoring in the longer term. Following consultation with providers over the summer, these principles will translate into an updated OfS Prevent monitoring framework which we will introduce in early autumn 2018. The academic year 2018-19 will be a transition year, as we recognise that providers will need some further time to respond to the revised monitoring arrangements.

Action required

15. This report is for information only.

What does monitoring under the OfS mean for providers?

Prevent as a core part of student welfare and safeguarding

The OfS has put student interests at the heart of its regulatory approach. Two of our four primary regulatory objectives set out in the Regulatory framework are to ensure that:

- All students, from all backgrounds, with the ability and desire to undertake higher education, are supported to access, succeed in, and progress from higher education.
- All students, from all backgrounds, receive a high quality academic experience, and their interests are protected while they study or in the event of provider, campus or course closure.

Effective student welfare and safeguarding arrangements across the sector are essential to meeting these objectives.

16. At the OfS we want every student to have a fulfilling experience of higher education that enriches their lives and careers. A core part of this is the personal welfare and wellbeing of students, which underpins their ability to have a positive higher education experience and to achieve successful outcomes. Students should expect to have a safe and inclusive learning experience that is free from harm.
17. The OfS has a role to play in supporting and championing the wellbeing of students. This will be achieved primarily through regulation at a sector level and working collaboratively with partners and experts to shine a spotlight on issues, identify gaps in evidence, co-produce and share evidence, and champion examples of effective and innovative practice which can be demonstrated to have the biggest impact on students. We have identified student mental health as a core priority in our business plan. As a part of the OfS's wider approach to championing inclusive, safe and healthy learning communities, we are currently taking forward work initiated by HEFCE, and continuing to fund and evaluate, through a total investment of £4.7 million, 119 projects seeking to address sexual harassment, hate crime and online harassment. These projects will be active throughout 2018-19 and we will share the evaluation and findings from them next spring.
18. As implementation of the Prevent duty is regarded and approached as a welfare and safeguarding issue, the OfS's role as Prevent monitor forms a core component of its wider remit to promote and protect student welfare and wellbeing. For example, many referral pathways that higher education providers have in place for Prevent-related concerns are similar to and involve the same staff roles as broader safeguarding pathways. This also extends to using the same information-sharing mechanisms and relationships with external partners. Indeed, the same vulnerabilities that may be exploited for the purpose of drawing people into terrorism can manifest themselves through broader welfare and safeguarding concerns, so a holistic and integrated approach is key.
19. Building on this legacy work, we are collaborating with students, providers, experts and stakeholders to co-develop a longer-term strategy relating to the role that the OfS will play, not only in championing our broader approach to student welfare and wellbeing, but also in

reviewing and building on the Prevent monitoring framework established by HEFCE. Having already undertaken some initial consultation in relation to Prevent, we expect to engage with the sector in developing our approach to student welfare and wellbeing through the summer, and will communicate further information by the autumn. Beyond this, we will continue to work with other stakeholders to define and build a long-term strategy.

Which higher education providers will be covered by the Prevent duty under the OfS?

20. Following the passage of the Higher Education and Research Act 2017, we do not expect any material changes to providers that are required to comply with the Prevent duty as set out in the Counter-Terrorism and Security Act 2015. However this is something we will monitor over the summer as providers register with the OfS.

From August 2019 when the OfS Regulatory Framework comes into force, RHEBs will be defined as:

- providers that are registered in both the 'approved' and 'approved fee cap' categories with the OfS⁴
- providers that are not registered but have over 250 higher education students
- providers that are designated for student support by the Secretary of State (e.g. for the purposes of 'teach out')
- all the autonomous colleges, schools and halls of the Universities of Cambridge, Durham and Oxford.

21. The Prevent monitoring role and associated monitoring framework are distinct from the OfS Regulatory framework. However, we do propose to ensure that information is shared appropriately between the Regulatory framework and the Prevent legislative framework, so that the two regulatory activities do not operate in isolation. For example, our risk assessment of providers relating to Prevent should take account of registration conditions relating to management and governance and freedom of speech considerations, and vice versa. Indeed, co-regulation has worked effectively up to this point by allowing providers to develop their own approaches, so long as they meet expected outputs and provide assurance that they are showing due regard to the Prevent duty.

Moving towards a strengthened risk-based approach to monitoring

22. We want to continue supporting open, transparent and trusting relationships with providers, giving them the tools to implement the Prevent duty effectively, while intervening only where concerns are identified, and in a timely manner. The OfS will build on the Prevent monitoring framework that was established by HEFCE, in the knowledge that the sector has generally complied with the duty. There is now an opportunity to review the previous monitoring

⁴ This excludes further education colleges, which will continue to be monitored by Ofsted.

arrangements, to ensure that our approach reflects both an evolving regulatory landscape and the current threat environment in relation to terrorism and radicalisation.

23. In March 2018 the Secretary of State for Education wrote to the OfS delegating to it the function of monitoring authority for RHEBs in England⁵. The letter was clear in its direction for us to move towards a more risk-based approach to monitoring, and we are considering how our monitoring approach might evolve to reflect the new values and approach of the OfS, including being increasingly student-focused, outcomes-driven and with a focus on co-regulation. While adhering to the requirements of the statutory guidance and maintaining core elements of the current approach, including a focus on proportionality and context, supporting continuous improvement, student engagement and working collaboratively with the sector and other partners, we will be moving towards a strengthened, evidence-based and risk-based approach.
24. Since February 2018, we have been consulting with key sector representatives, the government and other monitoring authorities across different sectors to share and test our emerging proposals, and ensure there is an opportunity to shape our future monitoring approach. We have set out in a letter to the sector 'Prevent monitoring under the Office for Students' on 11 July 2018⁶ the overarching principles and broad framework of the evolved approach to monitoring. In early autumn, we will publish a revised monitoring framework with further details, which will be effective from the 2018-19 academic year.
25. The annual reporting exercise will be replaced by a more data-driven accountability return. We will also expect providers to submit an accountability statement from governing bodies or proprietors, as the legally accountable entities under the Counter-Terrorism and Security Act 2015⁷, confirming that they have been assured that the organisation is giving due regard to Prevent. This information will provide the OfS with baseline assurance and evidence that will help to inform our wider risk assessment of a provider of giving due regard to Prevent. Additionally, the OfS will use Prevent reviews more systematically and more widely under our evolved framework to supply insight into how a provider is implementing the duty beyond data returns, encompassing not only where we have concerns triggered by particular circumstances, but also through use of random sampling.
26. In formulating our engagement strategy we will assess providers against the risk of not demonstrating due regard to the Prevent duty. Our assessment of provider risk will draw on a range of sources of evidence including a provider's Prevent track record, the OfS Prevent assessment process, information from a provider's compliance with ongoing conditions of registration, and information from Prevent partners more generally. This may include situations where, because of their context, individual providers require further support, for example because they face greater local challenges. Providers assessed to be at higher risk of non-compliance with the duty will be subject to heightened engagement from the OfS compared with providers assessed as lower risk.

⁵ See www.officeforstudents.org.uk/advice-and-guidance/regulation/counter-terrorism-the-prevent-duty/.

⁶ See www.officeforstudents.org.uk/advice-and-guidance/regulation/counter-terrorism-the-prevent-duty/how-we-monitor/.

⁷ The Counter-Terrorism and Security Act 2015 Section 26(1) at www.legislation.gov.uk/ukpga/2015/6/contents/enacted.

Transition year in 2018-19

27. While we intend to introduce an updated monitoring framework in the early autumn, 2018-19 will be a transition year for providers. This is in recognition that providers will need some further time to respond to our revised monitoring arrangements.
28. Those providers receiving feedback from the 2016-17 annual reports will be expected to submit information to the OfS about how this has been addressed, during a submission window in October 2018. Should a provider not submit the required information, this will inform our ongoing risk assessment, which could in turn trigger heightened engagement and a Prevent review.
29. All providers will be required to submit an accountability return to the OfS in December 2018, comprising both the accountability statement and a data return covering the academic year 2017-18. This includes those providers that previously submitted information to us in March.
30. Following the December submission, the OfS will use the accountability returns, alongside other sources of evidence, to identify higher-risk providers, and to select the first random sample of other providers that will be subject to Prevent reviews from February 2019.
31. Further details about the arrangements for the transition year can be found in our letter to the sector, 'Prevent monitoring under the Office for Students', and will also be contained in the revised monitoring framework. We will write to providers with outstanding feedback to detail the exact requirements and how to submit information.

Key findings from 2016-17 annual reports

The assessment process

32. Our assessment of Prevent annual reports from higher education providers can result in one of three outcomes:
 - **Demonstrates due regard** to the need to prevent people being drawn into terrorism: policies and processes satisfy the requirements of the statutory guidance and there is sufficient evidence of active implementation (taking into account the provider's context).
 - **Further evidence needed:** policies and processes need improvement to satisfy requirements, or further evidence is needed to demonstrate active implementation. This is a transitional category, with an opportunity to submit further evidence for reassessment.
 - **Does not demonstrate due regard** to the need to prevent people being drawn into terrorism: policies and processes do not satisfy requirements, or there is inadequate or no evidence of active implementation, or there is significant evidence of non-implementation of policies and processes. Any providers that fall into this category are given a short time to provide further evidence.
33. For fuller details of the current assessment process see Annex A.

Progress since 2015-16 annual reports

34. Key findings from the analysis of the first set of annual reports for 2015-16 were published in August 2017⁸. Following the conclusion of the 2015-16 annual reporting exercise, **21 RHEBs** needed to provide **further evidence** to demonstrate due regard to the Prevent duty. HEFCE worked closely with all 21 as part of the assessment follow-up; as a result 19 providers moved to a judgement of 'Demonstrating due regard' after submitting additional information and evidence. At the point of submission for this year's annual reporting cycle, two providers remained in a 'Further evidence needed' category and were working constructively with HEFCE to move to 'Demonstrating due regard'.

Compliance outcomes from analysis of 2016-17 annual reports

For the 2016-17 annual report assessment exercise, **97 per cent** satisfied us that they were **demonstrating due regard** to the Prevent duty at the point of assessment. This is an **increase of three percentage points** from the previous year's cycle.

35. We received annual reports from 315 providers subject to the Prevent duty. This is an increase of two from last year (313) as several providers have either entered or left the monitoring purview. Providers have entered monitoring through becoming funded RHEBs or being awarded specific course designation, and those that have left have lost their designation or merged with another RHEB. These providers were not required to submit annual reports.
36. In the review of annual reports submitted, **97 per cent (304 providers)** satisfied us that they were demonstrating due regard to the Prevent duty.
37. The assessment identified **3 per cent (10 providers)** that were judged as having '**Further evidence needed**' to demonstrate due regard to the duty. After follow-up activity, two of these 10 providers have now provided the further evidence required. Providers assessed as having 'Further evidence needed' have been given a deadline of four months from receipt of their compliance outcome to submit additional evidence of active implementation against an agreed progress plan, which will be reassessed and a revised outcome given as appropriate. Some providers will receive a formal Prevent review meeting to gather additional evidence.
38. Of those providers that received a 'Demonstrates due regard' judgement, **49 per cent also received feedback and specified actions** relating to particular areas of the statutory duty – for example, requests for updated policy documents to be submitted once formally approved, or recommendations for enhancing and strengthening approaches to implementation. Further information is set out in paragraph 42. In addition, where we identified that a provider was yet to complete certain necessary actions at the point of annual report submission, it received a 'Demonstrates' judgement that was contingent on this being fully completed within a specified timescale. One such example is in relation to incomplete training for key staff at the point of the annual report submission; failure to complete training activity within the specified timescale could result in a change of judgement. This accounted for 33 providers in this category.

⁸ 'Analysis of Prevent annual reports from higher education providers for activity in 2015-16' (HEFCE 2017/11), available at www.hefce.ac.uk/pubs/year/2017/201711/.

39. **One** provider was assessed as ‘**Not demonstrating due regard**’ to the duty and was referred to the Department for Education. This was due to insufficient evidence to demonstrate due regard being submitted as part of the annual report.
40. The outcomes for providers following our assessment of their annual reports are set out in Table 1.

Table 1: 2016-17 annual report judgement overview by provider

Demonstrates	Demonstrates with feedback	Further evidence needed	Does not demonstrate	Grand total
156 (50%)	148 (47%)	10 (3%)	1 (0%)	315

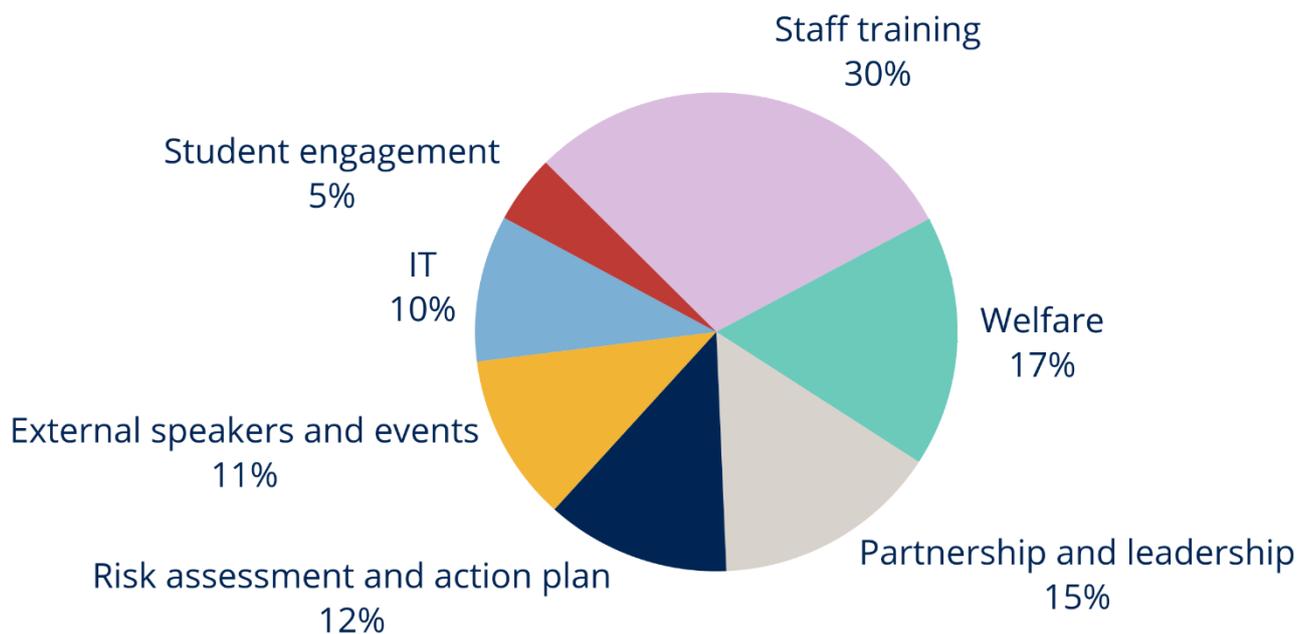
Change in compliance outcomes for the last two reporting cycles

41. A comparison between the findings from the 2015-16 annual reports and the compliance outcomes data for 2016-17 shows the following:
- The number of providers assessed as having ‘**Further evidence needed**’ before we can make a compliance judgement decreased by **52 per cent** across the sector. This represents an overall increase in compliance across the sector, with more providers (an increase of 4 per cent) ‘**Demonstrating due regard**’ at the point of assessment.
 - Two providers assessed as requiring further evidence last year have received the same judgement this year. This makes up a nominal percentage of providers across the sector overall, with the majority of providers given a ‘Further evidence needed’ judgment last year receiving a different outcome this year. Both providers are addressing the issues identified.
 - One provider was found **not to demonstrate** due regard from this year’s exercise, which is a nominal percentage increase overall since last year.

Feedback to providers on 2016-17 annual reports

42. The feedback we gave to providers across our judgment categories covered all areas of the statutory guidance. However, the most prevalent area was training, which accounted for 30 per cent of the total feedback. This affected 84 providers. Figure 1 illustrates the proportion of feedback within each specified area. On welfare and external speakers and events, the feedback tended to focus on requiring providers to communicate policies more actively, to amend policies that had been revised and submitted to us, or to show us policies that they had signalled they were intending to review. On partnership and leadership, most of the feedback was related to institutional coordination of Prevent, but instances included asking for information about a reconstituted Prevent steering group, further information relating to internal coordination, and engagement with multi-agency partners.

Figure 1: Feedback issued to providers by thematic area



Data reported through annual reports

43. As part of their annual reports, providers included a mandatory data return as further evidence of how the sector is actively implementing the Prevent duty. We now hold two years of data relating to numbers of staff trained, high-risk events and student welfare referral processes. The data submitted in the 2016-17 annual reports covers activity between 1 August 2016 and 31 July 2017. A full explanation of the nature of the data requested is available in Annex A of 'Guidance for Prevent annual reports for 2016-17'⁹.

44. For the 2016-17 annual report, providers were required to submit data pertaining to Prevent activity across three areas:

- welfare (including internal and external Prevent referrals)
- events and speakers
- staff training.

45. This data is interpreted as part of the assessment process, providing an indication of activity at individual provider level that can be used to gauge consistency of approach across other similar providers, or may show that a policy has been tested through its use in practice. We have also used the submitted data to trigger additional analysis of the annual report relating to

⁹ Available at www.officeforstudents.org.uk/advice-and-guidance/regulation/counter-terrorism-the-prevent-duty/how-we-monitor/.

the effectiveness of the operation of policies and procedures, and reflections on how these approaches are working in practice.

46. For the first time we are publishing some of the mandatory data at a regional level. Figures 2, 3 and 4 offer some insight in to the regional spread of activity in relation to welfare, events, speakers and training. This is presented alongside the number of providers that are monitored in each region¹⁰, to offer some context. In looking at the figures it is helpful to note that some regions have a greater number of smaller providers based on the concentrations of autonomous colleges in Cambridge, Oxford and Durham, as well as a higher proportion of small independent providers in London.
47. Taking the distribution and type of providers found across the regions into account, the North East and South East still appear to have undertaken a higher proportion of initial training activity compared with elsewhere in the sector. The North East also appears to have a higher proportion of welfare activity as reflected in the data. This may to some extent reflect the fact that this region predominantly comprises larger higher education providers rather than the mix of scale of operation seen in other regions. The OfS is looking at options for further analysis to better understand some of the regional activity shown by this data.
48. As in previous years, we have aggregated all data at sector level to ensure that no individual cases are identifiable.
49. The full set of aggregated sector level data for providers supplied with annual reports is set out in Tables 2a to 2d.

Welfare

Between August 2016 and July 2017, 183 cases of Prevent-related welfare concerns were escalated to institutional Prevent Leads, and 24 referred to the Channel process¹¹ from higher education providers in England. This is broadly consistent with the previous year.

Table 2a: Number of Prevent-related cases where action was taken, aggregated to sector level

Number of cases escalated to a point at which the provider's Prevent lead became involved	Number of cases which led to external advice being sought from Prevent partners	Number of cases formally referred to Prevent partners (sometimes referred to as 'Channel referrals')
183	122	24

¹⁰ Providers have been assigned to police force areas according to the postcode of their legal address, using the November 2017 'National Statistics Postcode Lookup' (available at <http://geoportal1-ons.opendata.arcgis.com/datasets/d955cb2c0aa341fbba7f77adc15086cc>). These areas, which each comprise one or more complete local authorities, have then been grouped into regions. The rationale for assigning providers to regions in this manner is that Prevent relates to multi-agency safeguarding relationships, for example with Department for Education further education and higher education Prevent coordinators being organised regionally.

¹¹ Channel is a multi-agency support programme for people identified as being vulnerable to being drawn into terrorism. Further information is available at <https://www.gov.uk/government/publications/channel-guidance>.

Table 2b: Engagement of providers with the Channel process, aggregated to sector level

Number of times the provider has been kept informed on cases going through the Channel process	Number of times the provider has been invited to be involved in relevant multiagency welfare referral processes	Number of times the provider has accepted the invitation referred to above
21	20	18

50. The welfare data returned in the annual reports disaggregated by region is set out in Figure 2.

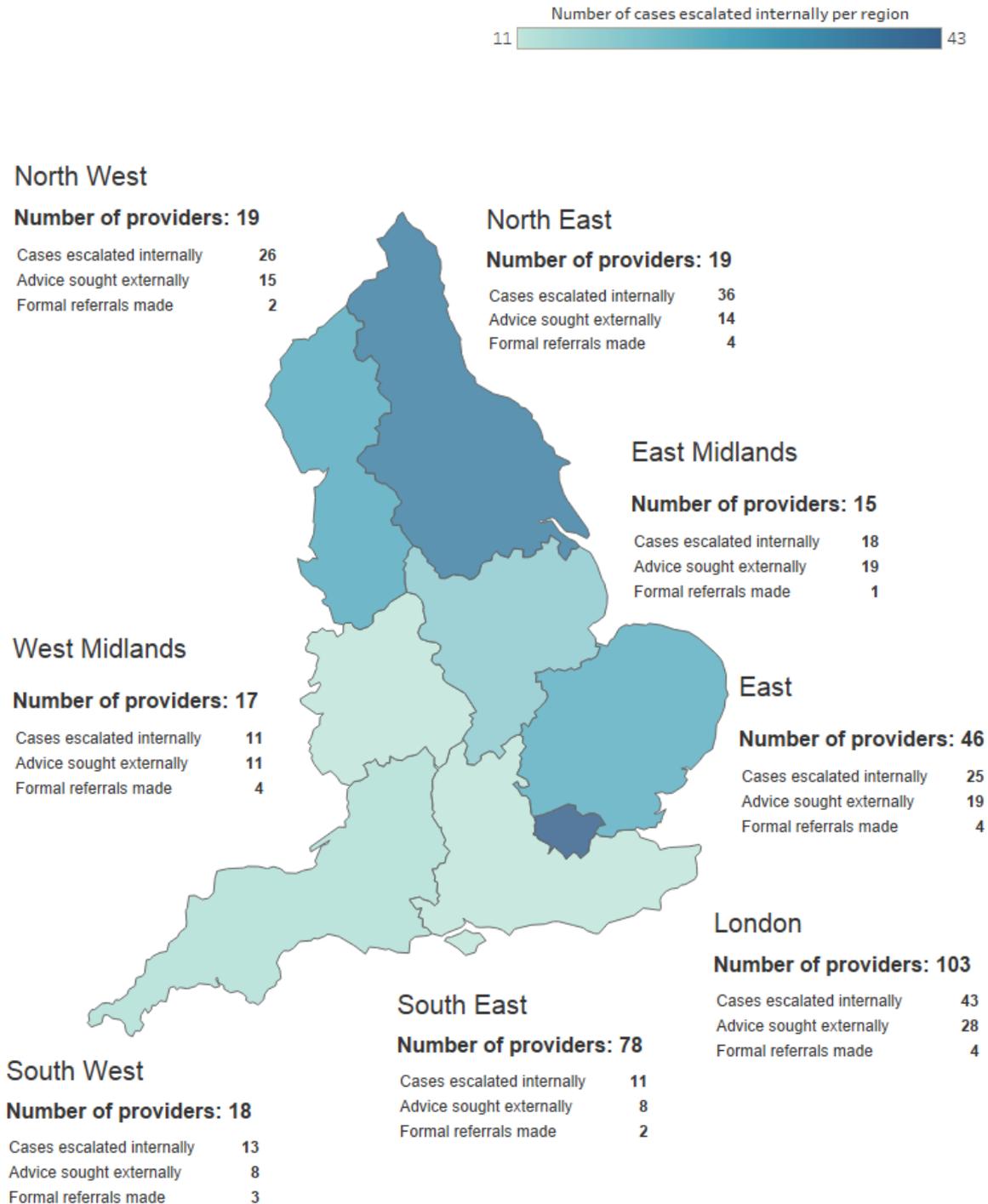
51. The data demonstrates the operation of welfare policies at individual providers, including how many cases were escalated by academic or student support staff to involve the Prevent lead; how many led to external advice being sought from Prevent partners (such as local police, the Department for Education’s further education and regional higher education Prevent coordinators, or local authority safeguarding leads); and the number of cases formally referred to Prevent partners – referring predominantly to Channel referrals.

52. As each provider has a welfare or safeguarding policy tailored to its individual context, the operation of these policies will be unique to each. However, the data broadly indicates that providers are using information-sharing processes and escalating Prevent-related concerns to external partners when appropriate. It is important to note that the data only captures cases escalated to the Prevent lead, and therefore is not indicative of lower-level use of internal policies and processes in considering welfare referrals. Also, escalation routes can be different depending on providers’ individual contexts. For example, the autonomous colleges use their respective university’s central referral mechanisms to escalate any Prevent-related welfare concerns, so any cases would be counted in the institutional dataset.

53. The number of internal referrals also provides assurance that welfare mechanisms are working effectively, and this has been further supported through illustrative case studies in their annual reports.

54. In the area of welfare, the data template did not ask providers to note explicitly whether the different levels of referral related to the same case or incident, so we are unable to say categorically that the increasing level of referral relates to the same cases, except where providers have specified this in the supporting narrative. Additionally, as all of the autonomous colleges use the central university welfare mechanisms, the data may include a certain amount of double-counting of cases.

Figure 2: Data on operation of welfare policies by region



55. As set out in Table 2a, providers have reported **24 referrals to the Channel process** in 2016-17, which is broadly consistent with the data reported for the previous year. This suggests that referrals from higher education make up an extremely small proportion of overall Channel referrals, with the Home Office’s own Channel referral data reporting that across the wider education sector 1,976 referrals were made in the period from 1 April 2016 to 31 March 2017¹². Indeed, the number of instances where referrals were made does not mean that these referrals

¹² See <https://www.gov.uk/government/statistics/individuals-referred-to-and-supported-through-the-prevent-programme-april-2016-to-march-2017>.

have been accepted onto the Channel programme. Moreover, providers shared with us a number of cases which appeared to be Prevent-related in the first instance, but were subsequently established to be related to, for instance, mental health.

56. We compared the data reported in 2016-17 with that reported in 2015-16 and it is broadly consistent; there were no significant changes that would warrant further investigation in themselves. Further information about the 2015-16 data can be found in 'Analysis of Prevent annual reports from higher education providers for activity in 2015-16' (HEFCE 2017/11)¹³.

57. HEFCE did not collect broader data on welfare and safeguarding concerns managed within individual providers, so we are not able to assess what proportion of overall cases are Prevent-related. It would seem likely, given the increasing prominence of and concerns around student mental health and wellbeing, that these referrals represented a very small proportion of these total concerns. This will be an area for the OfS to explore as it develops its role as regulator with an oversight of the entire higher education sector in England: to gather, use and share evidence-based data and effective practice relating to approaches to supporting the wellbeing of students.

Events and speakers

271 events and speakers were escalated to the highest levels of approval in the 2016-17 academic year. Although difficult to quantify exactly, this represents a very small proportion of the total number of events taking place every day across the higher education sector.

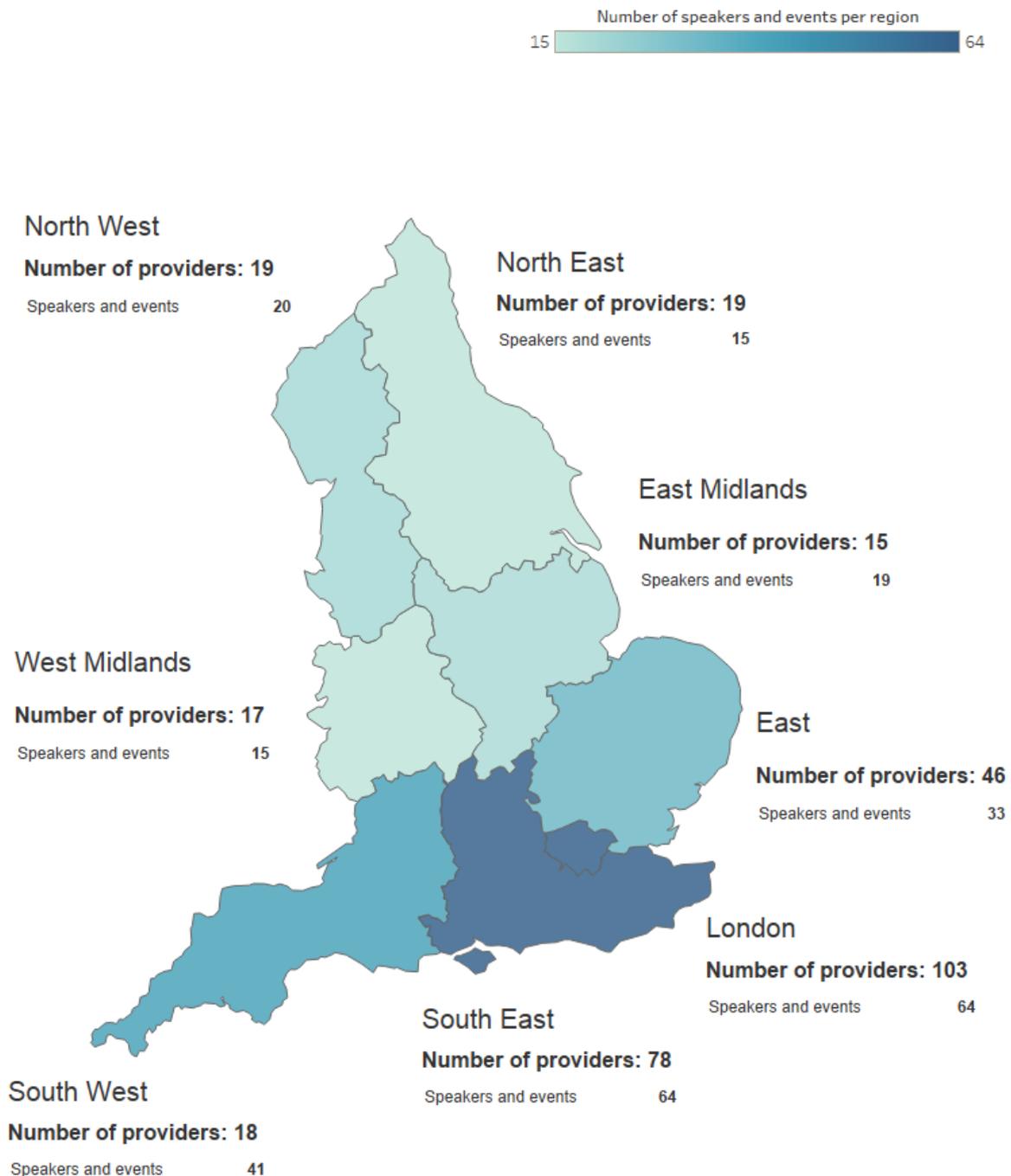
Table 2c: Referrals of events and external speakers, aggregated to sector level

Speakers and events referred to the highest levels of approval required by the provider's procedures
271

58. The external speakers and events data returned in annual reports disaggregated by region is set out in Figure 3.

¹³ Available at www.hefce.ac.uk/pubs/year/2017/201711/.

Figure 3: External speakers and events referred to the highest levels of approval by region



59. The data for external speakers and events gives an indication at a broad level that providers are using approvals processes and escalating Prevent-related concerns to the highest level of approval as required. However, as the data only captures this category of cases, it is not indicative of lower-level use of internal policies and processes in considering external speaker and event requests. Across all providers, the data returned represents a very small proportion of the overall number of events hosted, but demonstrates that active processes are in place for identifying and appropriately managing events which might represent a higher risk. We have

used the data in conjunction with accompanying narrative to reach a conclusion about compliance, particularly where providers have not escalated any cases to the highest level of approval.

60. The data template did not ask providers to differentiate between the number of speakers and the number of events referred to the highest level of approval. This differs from last year's template where this data was disaggregated, meaning we were unable to ascertain whether an event with a speaker was counted as two separate instances. We are therefore unable to draw meaningful comparisons with last year on this point.
61. We know that the higher education sector is deeply committed to delivering a rich and diverse programme of external speakers and events for its students and local community, covering a range of cultural, political and socio-economic topics. We do not collect data on the number of events taking place across the sector, but the 271 events identified above are likely to represent a very small proportion of the total number.

Staff training

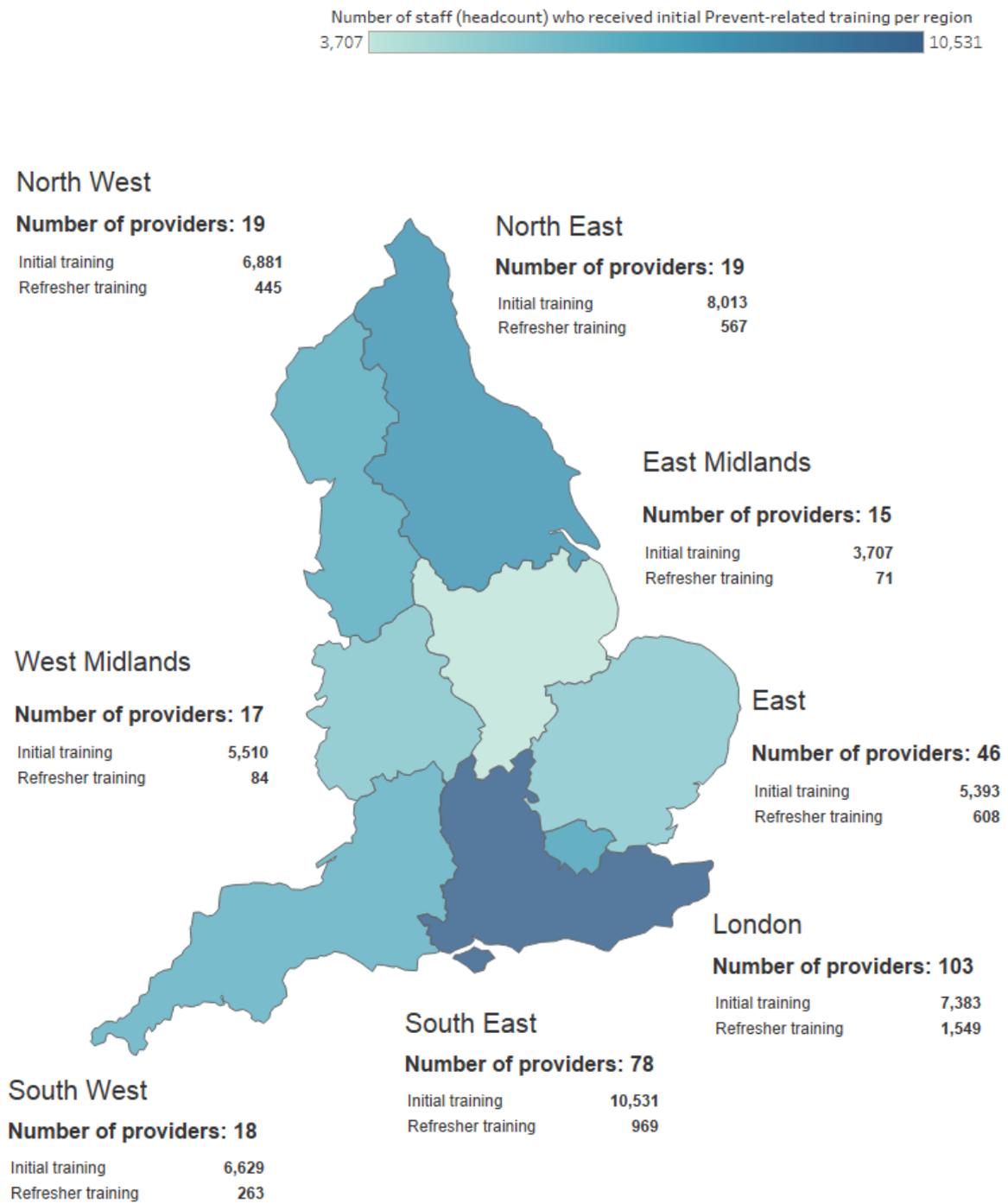
Over 67,730 members of staff have received some form of Prevent training across the higher education sector in the 2016-17 academic year, producing a total of 120,840 since August 2015.

Table 2d: Training of staff, aggregated to sector level

Total number of staff who received Prevent-related training	Number of staff who received initial Prevent-related training	Number of staff who received refresher Prevent-related training
67,730	54,047	4,556

62. The training data returned in annual reports disaggregated by region is set out in Figure 4.
63. The majority of providers have been making good progress with the implementation of their training plans. Most have already completed all baseline training for key staff and a small number plan to complete it by the end of the 2017-18 academic year. Training programmes, and identifying key staff for training, are undertaken at the level of each provider, reflecting its context and risk assessment. Training may be online or face-to-face, or a mixture of both. It is therefore difficult, without an in-depth understanding of the individual context of each provider, to draw firm conclusions at a sector level about the proportion of staff who have undertaken Prevent-related training in the reporting period.
64. In addition, while all providers will refresh training for staff on a regular basis, generally between every two and three years, this may not be done annually for all staff, which may make comparisons difficult between future data sets in this area. Nevertheless, this data gives us a sector-wide picture of considerable activity over the last year to provide staff with training in relation to Prevent.

Figure 4: Number of staff (headcount) who received Prevent-related training by region¹⁴



65. The data on training shows that 67,730 staff members received Prevent-related training during the reporting period, with over 4,556 members of staff already receiving refresher training. Combining with the figure reported to us last year, the total number of staff in the sector who

¹⁴ It was not mandatory for providers to return the number of staff who received initial and refresher Prevent training. The map above is based on the data for 92 per cent of providers that completed the fields, and covers approximately 85 per cent of the total staff trained.

have received training now stands at 120,840. This figure may contain instances of double-counting from institutions, e.g. staff receiving training in both years, or where staff work at more than one provider.

66. We have undertaken further analysis of the training data for the last two years to identify outliers and those with the lowest levels of training, and to corroborate the judgements that we have reached. This included reviewing numbers of staff trained in Prevent as a percentage of the total staff population in all the OfS-funded higher education institutions.
67. The data showed significant variation between providers, with some training less than 10 per cent of their staff and others training over 80 per cent, which we believe warrants further exploration. A number of factors impact on the validity of the training data we have gathered to indicate compliance with the duty:
 - a. Some providers indicated that they had completed Prevent training in the narrative accompanying the detailed material submitted before the first annual report. This information would not have been captured in data returns, as these were not mandatory at the time.
 - b. Many providers have taken a tiered approach to training, with key staff involved in the delivery of Prevent receiving a more in-depth level of training. The figures may only capture formal training and may not include briefings, cascaded information or other forms of awareness-raising.
 - c. During the first annual reporting period not all providers had systems in place to record training delivery, so not all information may have been captured in the data return.
 - d. Some providers have indicated that training delivery has taken place outside the formal reporting period, so this has not been captured in the data return.
68. We did identify a small number of providers that are yet to complete their baseline training. The reasons why they have not completed training are varied and include organisational restructure, decisions to deliver different training products, or a phased approach which has meant, for example, that academic staff including personal tutors are only now receiving training.
69. It may be that some other providers have not completed all their baseline training for key staff. We have, however, been able to take sufficient assurance from the accompanying information provided to us, set in the context of providers' broader narratives in their annual report, that they are paying due regard and that their staff know how to raise a concern.
70. Where we have identified concerns with the progress of delivering baseline training, we have given a 'Subject to' judgement to emphasise the importance of this activity. This reflects the fact that we are two and a half years into the duty. We see this as a priority element of demonstrating due regard which needs to be resolved quickly, and in any case by the end of the academic year.
71. As we believe the completion of training is a core component of demonstrating compliance with the duty, and in light of some of the discrepancies in the data on numbers of staff trained, we

are undertaking deeper analysis over summer 2018 to develop a better understanding of the approaches across the sector.

Next steps

72. We intend to continue to collect data in future monitoring returns to provide an evidence base of the work the higher education sector is doing to implement the Prevent duty. We are reviewing and developing our monitoring framework including the data requirements. Further information is set out in paragraph 25, 29 and 30, and in our letter to the sector, 'Prevent monitoring under the Office for Students'.

Areas of effective practice

73. The annual reports for 2016-17 demonstrated a high level of continued activity across the key areas of the Prevent duty statutory guidance. While we did not ask providers to comment on every area of the statutory guidance in their annual reports, a range of good practice was identified across the core factors of the duty, in keeping with previous years.

74. Paragraphs 75 to 82 summarise areas of effective practice which build on the approaches that we saw in the first set of annual reports, and which we identified through the assessment process as particularly strong. We have included a range of case studies giving examples of effective practice by particular providers in different parts of the sector.

Assessment of risk

75. The vast majority of providers confirmed in their annual reports that they had reviewed their **risk assessment** during the last reporting period. Where this was not explicit, providers received feedback setting out our expectations that they should review and update their risk assessment and action plan as a core requirement of the statutory guidance. As with previous monitoring cycles, where no significant changes had been made to a provider's risk assessment, we were content to accept the provider's assurance that the risk assessment remained an active document. We saw various examples of effective practice.

Case study: The University of Cumbria

The university registrar and secretary, as a member of the senior management team, has responsibility for institutional oversight of the Prevent duty including the risk assessment, providing a mechanism for senior management and board oversight. This responsibility now rests with the Director of Student and Staff Services in their role as strategic Prevent lead.

The university's Safeguarding Group presents quarterly Prevent risk assessment reports to the board's Audit and Risk Committee and the university's Safeguarding Group, and an annual report for the board. 'Risk owners' are asked to review and update the risk assessment and mitigating actions on a quarterly basis, and these were reviewed by the registrar and secretary and are now reviewed by the Prevent/Safeguarding Management Group before they are reported to the committee. Satisfied that the university had successfully developed and embedded Prevent risk assessment and action plans across the university, the Audit and Risk Committee agreed to reduce reporting twice a year. The committee reviews the draft annual report prior to it being considered for approval at the university board. In future an annual audit of the risk assessment and action plan will be

carried out and reported to the Prevent/Safeguarding Management Group before submission to Audit and Risk Committee.

Case study: The University of Durham

The university has drawn on the knowledge and expertise of local Prevent partners to inform its risk assessment and ensure Prevent duty implementation is proportionate and appropriate to its context.

In the summer of 2017, the university convened a workshop of internal and external partners who re-evaluated the risks associated with radicalisation and extremism in the university, and considered whether any risks needed to be added. The workshop also reviewed the controls for each risk and the scoring. The stakeholders reviewed the existing action plan and developed further actions for incorporation into a revised plan. The updated risk register and action plan were subsequently considered and agreed by the university's executive committee and council.

Welfare

76. There was significant evidence across providers' annual reports of the effective and ongoing implementation and development of policies and procedures relating to welfare, including chaplaincy support and pastoral care. This included:
- a. Ongoing work to continue to integrate Prevent into broader welfare, wellbeing and safeguarding policies.
 - b. Increasing examples of reflective practice, with providers making adjustments to policies and processes as a result.
 - c. Appointment of dedicated welfare staff in centralised student support teams as well as safeguarding leads in different faculties and departments, to act as a central point of contact and source of information-sharing for academic staff and students.
 - d. Convening of 'case conferences' to discuss individual student welfare concerns, drawing on staff input from different institutional functions including, for example, student support services, academic services, accommodation, student unions, information technology (IT), etc.
 - e. Systems and infrastructure developed for appropriate 'signposting' for students to welfare resources, either for themselves or to raise concerns for others. This often included online support and online point of entry into the system.

Case study: London School of Commerce

Students all have allocated mentors who are part of the marketing team and in many cases graduates from the London School of Commerce (LSC). They forge a strong relationship with

the students for whom they are responsible, guiding them through the application and enrolment process, closely monitoring attendance, performance on the programme, and all aspects of their studies at LSC. Through regular meetings with the students, the mentors can swiftly identify any students who are at risk of not completing their programme, or who are presenting changes in their behaviour which give cause for concern. All mentors have been through the Workshops for Raising Awareness of Prevent training and have been encouraged to use the material on the Safe Campus Communities website to further develop their knowledge and awareness of Prevent.

Case study: A college of the University of Oxford

The College Welfare Committee is chaired by the principal and attended by the senior tutor, academic registrar, chaplain, college nurse, two tutorial fellows (as tutors are often the first to see that a student is in need of support and can offer support and signposting), the accommodation officer (as ancillary staff can perform a similar pastoral role), and other staff and students. It discusses general student welfare concerns and strategies for addressing them, the use of the prayer room, the kinds of problem for which students are accessing support, and counselling services. Any Prevent-related incident would be scrutinised here. The committee reports to the governing body and can be called on outside its normal termly meetings. Many attendees have received briefings from the Conference of Colleges programme.

More routinely, any welfare concern that requires immediate intervention is raised with members of the Welfare team, who may put students in touch with others (counsellor, nurse, general practitioner etc.) who are better placed to offer support. The Welfare team meets fortnightly in term-time to share experiences and ensure joined-up support for individuals who have given cause for concern.

Case study: The Academy of Contemporary Music (ACM)

ACM has a student induction programme that all new students are required to attend at the start of each academic year. In 2017, ACM made a number of enhancements to the student programme, which included a section on student welfare and services delivered by the head of Student Services. Student Services have also launched a student support module in ACM's virtual learning environment to provide students with access to a range of information and guidelines for accessing support. ACM will enhance the student induction programme for 2018-19 to include greater emphasis on safeguarding matters, including the referral system (for concerns) and Prevent and this will include a delivered presentation and pre-arrival online induction module. The online 'Help Button' continues to be a popular means for students to request access to support and make referrals. With an augmented Student Services team including contact officers at each campus, ACM continues to strengthen its

support for students. Most requests for support and referrals come through the Help Button, with other referrals received through telephone or in person.

External speakers and events

77. In terms of the operation of policies and procedures relating to external speakers and events, we saw clear evidence that providers continue to make nuanced decisions and to balance their legal responsibilities with the requirements of the Prevent duty, as well as to ensure proportionate and consistent implementation. This is one of the core elements of the statutory guidance, and we found a range of positive practice, such as:
- a. Use of internal audits and reviews of lessons learned as part of reflective practice, with policies relating to external speakers and events subject to evaluation and review to improve the approach.
 - b. Regular reviews of freedom of speech codes of practices, incorporating experience and feedback from specific events and speakers, and revising policies and approaches where appropriate. For example, following the hosting of an event, some providers have discussed and reviewed the mitigations put in place at their Prevent working groups or at their council to incorporate reflective practice in their approach and ensure senior oversight.
 - c. Reviewing codes of practice to ensure appropriate balance across providers' broader statutory obligations, including in relation to freedom of speech and academic freedom.
 - d. Evidence of effective collaboration with student unions, student representatives and student societies to ensure external speaker policies and procedures are implemented consistently.

Case study: The University of Huddersfield

The University of Huddersfield's revised freedom of speech and external speakers policy was used to reassure colleagues of its commitment to freedom of speech. A working group has kept the policy under review to monitor its effectiveness and to consider feedback.

Overall the policy has been well implemented across the university, and although there were some initial queries, ultimately it has been successful in achieving its aims. However, the working group recognised two issues that had been raised with some frequency, which would benefit from a review of the policy: a perception that this was an 'external speakers' policy' rather than a 'freedom of speech' policy, and the strength of the 'academic voice' in external speaker decisions. In response to these concerns, a revision to the policy, approved by University Council in November 2017, emphasises the importance of freedom of speech in all the university's activities, not merely in connection with external speakers, and introduces a panel for the assessment of external speakers who are referred to the university secretary for review.

Although the university secretary remains responsible for ensuring freedom of speech on campus, where there are questions surrounding the viability of a speaker attending on campus that cannot be resolved at school or service level, the university secretary will now

form and consult with a panel including a pro vice-chancellor before making any decisions in respect of an external speaker.

Case study: BPP University

During 2016-17, the national Prevent compliance manager and the Prevent champions continued to promote and train staff and students on the process for booking events, including developing online training guides. The national compliance Prevent manager worked with the BPP University Students' Association to promote compliance with the policies and procedures surrounding events and external speakers. These feature in the BPP University Handbook. The majority of events are booked and approved using an online booking form. Based on engagement with staff and students, the online form and process was updated during the reporting period to improve user experience, security and the oversight of events.

Ongoing co-ordination of Prevent, including working with local partners

78. We saw clear evidence in the annual reports of continued engagement and oversight from senior managers and governing bodies or their equivalents in the implementation of Prevent. There was also evidence of positive engagement with local Prevent partners and partner institutions, and development of relationships with local communities, for example:

- a. Continued senior-level engagement and coordination of the duty, including the continuation of Prevent working groups, with many providers reviewing their membership and revising their format to improve efficacy.
- b. Ongoing engagement of governing bodies with Prevent through training, awareness-raising and scenario modelling to test core policies and procedures.
- c. Prevent featuring as a standing agenda item on working groups and senior management meetings, including review of risk assessments.
- d. Commissioning of internal audits to look at approaches to Prevent, or undertaking other reviews of policies and processes to provide further assurance to senior leaders.
- e. Active participation of providers in external Prevent partnership groups, with an increase in information-sharing agreements facilitating effective practice and promoting dialogue.
- f. A greater number of partnership arrangements and information-sharing protocols developed between providers, with examples of shared training materials and arrangements for shared use of facilities incorporating the requirements of the duty.
- g. Evidence of increased due diligence for new franchise partners and revision of information-sharing mechanisms between existing partners.

- h. Increased development of community partnerships to complement welfare and chaplaincy provision by providers, with a notable increase in partnerships around faith, to promote broader community cohesion.
- i. Appointment of dedicated chaplaincy staff as a result of developing and enhancing welfare provision and links with local communities, although some challenges have been identified in recruiting Muslim chaplains.
- j. Regular contact with the relevant Department for Education (DfE) further education and higher education regional Prevent coordinator, including seeking advice on welfare concerns and potential speakers where appropriate.

Case study: GSM London Ltd

GSM London Ltd's chief operating officer, a member of the board of directors, has overall responsibility for Prevent, with the college secretary and academic registrar acting as the operational Prevent lead, chair of the Prevent Oversight Committee, and single point of contact for Prevent-related concerns. Both have attended the Leadership Foundation training for governors. The board receives progress reports and an annual summary report from the chief operating officer, the Prevent annual report and the Risk register, which the chair reviews and signs on behalf of the governing body.

The college secretary and academic registrar also chairs GSM's Prevent Oversight Committee, which oversees and manages the Prevent duty, having superseded a Prevent working group and Prevent Implementation Project Board. This committee also includes the pro-convener and deputy dean responsible for the student experience, the directors of human resources and IT, the head of estates, wellbeing manager, senior personal tutor and the student union president). IT meets once per semester and reports to the executive committee.

Case study: University College Birmingham (UCB)

UCB actively engages with internal and external partners including the Association of Managers of Student Services in Higher Education, the regional DfE further education and higher education regional Prevent coordinator, and Prevent liaison officers in the West Midlands Counterterrorism Unit to support the Prevent agenda. During 2016-17 these partners organised events for police and providers to receive coordinated briefings, debate challenges and provide examples of good practice. UCB has regular access to Birmingham's Channel panel and understands its procedures and risk and threshold assessments for referrals. UCB and its Guild of Students collaborate with other institutions regarding local risks. Five Birmingham Universities meet termly in a regional Prevent working group to discuss the challenges each faces in implementing the duty, and to share good practice and non-sensitive information. Regular communication with all these partners robustly underpins implementation of the Prevent strategy at UCB.

Leadership engagement with safeguarding and Prevent is robust: safeguarding is reviewed across all areas of provision and Prevent is embedded in this framework. The corporation, executive and senior management teams are actively engaged with its implementation and scrutinise its effectiveness. The Prevent lead is a senior manager, presents regularly to the Equal Opportunities and Professional Development and Health and Safety Committees, and represents safeguarding and Prevent interests on the Student Services and Standards Committee, a sub-committee of the university corporation. UCB's safeguarding procedure is reviewed and validated annually by the academic board.

Case study: The University of Central Lancashire (UCLan)

The university's board and vice-chancellor authorise the chief operating officer to act on their behalf on Prevent duty responsibilities, supported by the director of student services and by the student living and safety manager, who is UCLan's Prevent lead. Safeguarding and Prevent activity are coordinated to ensure a consistent approach to assessment and referrals. Senior Prevent staff work closely with the chaplaincy, the regional DfE further education and higher education regional Prevent coordinator, the Lancashire Constabulary Diversity Team, the local area Designated Officer and the local Counter-Terrorism Security Adviser. University representatives attend regular training and information-sharing events, and the Prevent lead is a member of the North West Prevent Group.

UCLan has information-sharing agreements in place with Lancashire Constabulary, the Cambridge Education Group (whose students are based on the Preston campus) and a local general practice. The student services team co-ordinates such activities, to develop a full picture of vulnerable students.

The Students' Union president and chief executive officer are active members of the Social Cohesion Group, ensuring students' views are taken in to consideration. The chaplaincy team is also represented and reports on the local community's views. This activity is overseen by the Audit and Risk Committee, which scrutinises the annual report along with the board of governors. The Students' Union and the university issue messaging jointly throughout the year relating to safeguarding, cohesive campus community, respect, diversity, equality and inclusion, looking after each other, and being good neighbours. Key materials such as police marketing videos and British Council welcome guides for international students are also disseminated.

Engagement with students

79. We saw clear evidence of a continued commitment to engaging and consulting with students on Prevent, with a wide range of examples of continuous active consultation with student bodies, student union sabbatical officers, academics and staff working in professional services. Examples of positive practice include:

- a. Regular meetings between management and student representatives, with student representation on steering groups and mechanisms to ensure that the student body is

consulted on Prevent policy at a senior level. This included descriptions of formal reporting lines, with reporting to the student union or equivalent, typically having its president on the Prevent committee.

- b. Frequent engagement with students and student unions, with various examples of innovative practice in communications, effective partnerships with student unions, and provision of student training in relation to Prevent.
- c. Promotion of Prevent-related activities by student unions.
- d. Raising awareness of Prevent and routes for seeking welfare support, including an increased focus during induction and freshers' weeks.

Case study: The University of Plymouth

The University of Plymouth has a comprehensive student engagement strategy, including close, effective partnership working with the Students' Union with regard to the Prevent duty. The Student Life Committee, co-chaired by the Students' Union president and the Deputy Vice-Chancellor for Education and the Student Experience, represents the formal reporting line for the Prevent duty. It includes all the Students' Union's elected sabbatical officers and members of its staff executive, the director of student services and the head of complaints, appeals and conduct.

Students' Union officers meet regularly with the Prevent duty leads and are working with them on a number of consultations, projects and campaigns promoting diversity, inclusion and wellbeing. The University seeks to create deliberative spaces where students are free to engage in critical thought and questioning, not just about the specifics of the implementation and operation of the Prevent duty, but the premises on which it is built. As reported in the 2015-16 annual report, the Students' Union has issued a statement protesting the Prevent duty as government policy. Nevertheless, it recognises that the duty places statutory responsibilities on the university, and has pledged to continue this partnership while supporting a proportionate response focused on safeguarding and the duty of care.

Of particular note is the organisation of events promoting diversity and inclusion such as Islamic Awareness Week, and a 'Know Your Rights' event organised by with the Students' Union, the careers and employability service and campus trade unions. The International Student Orientation Programme includes a number of events co-organised by International Student Advice with the Students' Union, including a briefing on 'keeping safe'.

Case study: ICMP Management Ltd

The student president, vice-president and social secretary are invited as full members of the Prevent Steering Group. The student senate acts as a general sounding-board for student opinion. Operating across programmes, it provides a forum for students' views. The Prevent lead at ICMP Management Ltd gave a presentation on Prevent and explained all actions taken to date. The senate were asked to comment on whether it felt more information

needed to go to students through poster campaigns, TV screens, etc. It agreed that, taking into consideration the risks identified and the action already taken, it was sufficient for student officers to be informed and kept up-to-date on Prevent-related issues. The senate agreed that providing more information on Prevent for all students might have a negative impact and create an atmosphere of fear rather than reassurance.

It was agreed at the Prevent Committee meeting in February 2018 that, as the student president and vice-president are elected annually, in addition to the Prevent awareness presentation and update on decisions the Student Senate should be consulted annually on whether they feel communications should be sent out to all students in the aftermath of a UK-based terrorist incident. This has now been added as a fixed agenda item for the first Senate meeting of each academic year.

Case study: The University of Portsmouth

The University of Portsmouth is working effectively with the students' union to consult with students on any changes to its implementation of the Prevent duty and to maintain close contact on the way that Prevent operates in the university.

The university and the students' union have agreed that the students' union will lead on engagement and consultation with the student community on the implementation of the Prevent duty. This is conducted through face-to-face discussion, surveys and focus groups depending upon the issue for consultation. Through this mechanism students are able to influence the university's response to the duty and provide feedback on how well it is operating within the university.

Staff training

80. Providers are taking a variety of approaches to staff training, tailoring resources to meet their own individual context and requirements. The majority are well advanced in implementing their staff training plans, and most have completed their key staff training and are focusing on refreshing training and inductions for new staff. There is also evidence of significant broader work in this area across the sector to raise awareness of key policies relating to Prevent among staff and students more widely. For example:
- a. Many providers continue to review the effectiveness of their training resources and have rolled out bespoke online training modules to all staff, as well as resources tailored for staff working in key student-facing and specialist roles.
 - b. Following evaluation of training approaches some providers have identified further staff groups who would benefit from training, such as academic staff and non-academic staff with student-facing responsibilities, such as security, porters and cleaners, as well as those in direct student support roles and personal tutors.
 - c. Various delivery methods and combinations of delivery were identified, including classroom-based learning, often with a Workshops for Raising Awareness of Prevent

accredited trainer, online modules created by the provider, use of Leadership Foundation resources, and to a lesser degree video delivery. There has also been training for board and senior management team members and for partner organisations, training delivered by local police, and unconscious bias training.

- d. Commitment to refreshing training, typically on a two-to-three-year cycle.
- e. Development of online systems to monitor uptake and completion of training.
- f. Embedding of Prevent training within broader training programmes on safeguarding and welfare, including staff induction processes and training for staff returners.
- g. Provision of complementary training, such as unconscious bias training for staff to safeguard against over-zealous reporting of concerns.
- h. Increased access and use of the training materials available on the Safe Campus Communities, where 30,000 users have accessed Prevent e-learning materials over the last year.

Case study: The Institute of Cancer Research (ICR)

All new staff members, students and visiting workers are required to attend face-to-face training on equality excellence; attendance is necessary for new staff to pass probation, and is monitored by internal audit as part of an integrated management system. Since July 2015 this training has included a section on the Prevent duty. During 2016-17, 183 people were trained on the equality programme.

ICR has also now produced a refresher equality excellence webinar for existing staff, containing material on Prevent; a first webinar has been held with a pilot group including the deputy Prevent lead, and will shortly be made available to all staff as a recording. All key staff with direct responsibilities under the duty as identified in ICR's policies and procedures have attended external training, been coached face to face and studied independently as part of their continuous professional development, as monitored by normal line management process. They are also encouraged to attend a targeted webinar which has been developed and customised by the internal learning and development unit using teaching materials made available by HEFCE. This material was launched in November 2016 and was delivered three times during the period 2016-17. The materials were improved for each presentation, based on new information and feedback from attendees.

Case study: A college of the University of Cambridge

The college links Prevent training to wider student welfare and safeguarding policy areas. The college considers the Prevent duty as part of its broader 'safeguarding' agenda, mainstreamed in all safeguarding activities. Every opportunity is taken to link Prevent awareness to other training and policy review.

Most recently this has included revisions to the policies on harassment and sexual misconduct and on dignity and respect, and training on handling cases of sexual misconduct. These centre on student welfare and the college's response to incidents that give cause for concern. Students contribute to policy development through the Liaison Committee, and are invited as appropriate to join training sessions, including recent training by the local Sexual Assault Referral Centre. Induction meetings for student organisers of college societies regarding courtesy, logistics and risk assessment (including due regard to Prevent duties) were held four times in the autumn term and three times in spring term. One further induction meeting took place in the summer term. These sessions are organised and led by the Dean of College, who is responsible for college discipline. Further to suggestions from the students, a booklet has been produced for event organisers that is downloadable from the college intranet.

Case study: Southampton Solent University

The university has undertaken a training needs analysis, matching job roles to the seven modules released by the Leadership Foundation for Higher Education. The foundation's Prevent training is available through the University's virtual learning environment system ensuring ease of access and tracking of completion.

In addition, a 'flip lecture' approach is supported by follow-up group training for some staff, who are required to complete specific e-learning modules by reading and digesting the training materials, and then attending a group discussion. Training for key frontline staff was completed by the end of 2015-16. Training was delivered to senior academic staff by the university Prevent lead by the end of March 2017, with a view to their dissemination of new knowledge to the wider academic body with a deadline of 31 July 2017.

The training needs analysis has worked well for the university on initial implementation. The university will continue to monitor, review and identify which people are required to complete the relevant Prevent duty training modules, and to contract with individuals the responsibility to complete this; for example, at particular times such as recruitment, appointment and promotion. Prevent duty training will also be monitored annually through performance and development review and via the reporting, tracking and certification capacity of the various modules accessible through the university's virtual learning environment Solent Online Learning.

Web filtering and monitoring and IT

81. The majority of providers have now taken a decision on whether to implement web filtering or monitoring, with some having reviewed and evaluated their chosen approach to date. Many providers reported that this remained a complex area of the statutory guidance, balancing considerations of IT safety and security with those of academic freedom. Where providers have decided not to implement web filtering, they have continued to put in place alternative arrangements to ensure safety online, such as amending relevant acceptable IT usage

policies, and introducing or strengthening processes for managing access to sensitive material. For example, we have seen:

- a. Periodic review of approaches to filtering and piloting new approaches, as well as updating IT acceptable usage policies.
- b. Development and implementation of social media policies.
- c. Working with research ethics committees to strengthen processes regarding access to sensitive or extremism-related research.

82. Following our thematic review, it was clear the sector would welcome more guidance and support. See paragraphs 98 and 103 to 106 for the further work we have undertaken in this area and our planned future activity.

Case study: All Nations Christian College

In accordance with statutory guidance, the college created an IT policy and an acceptable use of IT policy. As part of a review process and given the widespread use of social media by staff, students and the college marketing department, the college decided to formalise its existing social media guidance document by writing a social media policy to reflect previous informal practice.

The policy was written to encourage good practice, to protect the college, its staff and students from potential harm, to clarify where and how existing policies and guidelines apply to social media and to promote effective and innovative use of social media as part of the college's activities.

The policy also contains information on possible sanctions if misuse is identified; including blocking a particular user's access to prevent unacceptable usage. A designated member of staff monitors the use of social media and users receive a termly reminder about acceptable usage as well as displaying a list of simple guidelines around the campus.

Case study: Regent's University London

The University monitors staff and students accessing websites which may contain extremist and harmful content. In the spirit of transparency, a pop-up message informs the user that the website they are about to access has been flagged by the Home Office as potentially harmful, giving a choice to continue or cancel the attempted access. The list of extremist sites is updated regularly by the university's firewall provider, and a weekly report of users who have attempted to access sites is produced and investigated. The university has also improved reporting and monitoring tools to assist with investigating and assessing instances of accessing websites that fall under the extremism category, should it need to do so.

Case study: The University of Buckingham

The university has developed an approach to sharing Prevent-related information with relevant colleagues. Its proactive approach to web monitoring provides an appropriate balance between its responsibilities under the Prevent duty and the need for security-sensitive material to be accessed for legitimate academic purposes. The use of university computers and data networks policy stipulates that websites are matched against categories such as 'weapons' or 'extremism' (which includes hate and racism), as defined by the university's threat intelligence service.

A usage report is sent to and monitored by the Prevent lead on a daily basis via a dedicated email address. The report is shared with other staff from the Prevent working group to ensure that the procedures are followed and monitored during staff absence. This enables the university to build up a profile of web activity which may be considered alongside other safeguarding policies and procedures (such as the procedure for referral of concerns relating to radicalisation) to identify any further action needed as appropriate.

Areas where further development is required

83. In addition to the common themes relating to areas of feedback outlined in paragraph 42, we identified a number of broad areas across the annual reports which would benefit from improvement.
84. In some instances we required further evidence of the active implementation of core policies, particularly in relation to welfare and external speakers, which necessitated further contact as part of the assessment process to obtain appropriate evidence. This was generally addressed through the provision of case studies to illustrate policies operating in practice. There was also still some misunderstanding of legal definitions of vulnerability and the need for providers to clarify and communicate the scope of their safeguarding and welfare policies so that staff and students were clear on the action they needed to take if they identified a concern. This was addressed through feedback to individual providers, and will be raised through ongoing engagement activity where relevant.
85. Notwithstanding the effective practice identified for training, we noted a polarity of practice, as a small number of providers were yet to complete initial training for all members of staff they had identified with Prevent-related responsibilities, while others did not provide sufficient detail about training delivery to give full assurance. Concerns included a lack of plans for refresher training, conflation of different types of training in the data return, and a lack of clarity about what each individual provider has classified as training (i.e. whether this included formal training, briefings, or other methods of awareness-raising). Similarly, despite some providers showing effective practice in their approaches to student engagement, there was not much variation and this was predominantly achieved through formal representation on Prevent working groups or board meetings.
86. While the annual reports continued to highlight the value of the support provided by the DfE further education and higher education regional coordinator, some providers had not developed these relationships. There was also some disparity in the level of local and regional engagement across providers, including working with local Prevent working groups and local

authorities. Where this was the case, we set out our expectations through feedback on the need for providers to engage with their local Prevent partners, and shared the contact details of the DfE Prevent coordinator where appropriate.

87. As indicated in paragraph 78, the inclusion of chaplaincy and pastoral support in the Prevent statutory guidance has led some providers to review their arrangements in this area, including the management of faith spaces and new posts to provide chaplaincy support across a range of faiths. Some providers have identified a number of challenges including the need for further guidance and best practice on appropriate approaches to managing faith spaces. Difficulties were also identified in the recruitment of Muslim chaplains. Further work is required to understand the challenges faced by the sector in the area of chaplaincy support and to identify opportunities where we can facilitate the sharing of effective practice. This also ties in with the broader work that the OfS is taking forward to fund, monitor and evaluate a number of projects to tackle religion-based hate crime.
88. A number of the autonomous colleges continued to rely on early risk assessment templates, including unhelpful language or unclear statements in relation to the duty. On a related note, some risk assessments referred to a guarantee of confidentiality for staff and students. Where possible this was remedied as part of the assessment process query loop, but some providers will require further support.

Support requested by providers

89. Through the annual reports, providers were invited to identify any areas where they would welcome additional support. Overall we recorded 66 requests, with the majority relating to leadership and partnership. On the whole this related to accessing local Prevent partners and arrangements for information-sharing.
90. There were also instances of providers requesting support in relation to training and IT. Tailored training for students, both as peer supporters and as part of their professional studies, was felt to be lacking. This tied in with requests for further good practice to be shared regarding student engagement. Providers also reported difficulties in recording training uptake and delivery. In terms of IT, filtering continues to be challenging for providers. Clarity and guidance were requested regarding what specific content should and should not be filtered, with providers highlighting the disparity between different software filtration categories and the appropriateness of commercially available systems. The extent of coverage of filtration software, whether confined to halls of residence or beyond, was also raised. In conjunction with the DfE, HEFCE provided some further guidance on IT filtering and monitoring last autumn¹⁵. Without wanting to be directive about what should and should not be filtered as this is a decision for the provider to take, we will consider what more we could do, such as sharing case studies of particular approaches adopted.
91. Other support requests were predominantly individual, for assistance with issues faced by providers such as recruiting chaplains, how best to manage faith spaces, engaging with students effectively, and conducting safeguarding checks for contractors. In addition, some

¹⁵ See www.officeforstudents.org.uk/advice-and-guidance/regulation/counter-terrorism-the-prevent-duty/other-resources/#ITguidance.

providers mentioned that they would welcome further support regarding freedom of speech and Prevent, as well as clarity regarding extremism and its definition.

92. We will follow up with individual providers to discuss their specific needs where they have identified that they would value additional support and guidance. We will also consider what further work we may do to address these concerns and facilitate the sharing of effective practice and guidance as part of our broader programme of ‘thematic deep dives’, discussed further in paragraphs 101 to 107.

Other monitoring processes

Potential Prevent-related serious incidents

93. We have a well embedded process for handling potential Prevent-related serious incidents, which has been widely communicated, and have seen an increase in the number of incidents reported to us¹⁶. In the period from 1 August 2016 to 30 April 2018, 37 potential Prevent-related serious incidents were reported by 27 providers – around 9 per cent of those currently subject to monitoring – and a further eight examples where media reporting could suggest potential Prevent-related serious incidents, involving two or more providers. On closer examination, not all of these were actually assessed to be related to Prevent, or indeed serious. Recent examples include anonymised discussion of potential acts of hate crime, arrests under the Terrorism Act 2000 and other related legislation, welfare concerns that may be Prevent-related, forthcoming events that may be deemed controversial, and negative media attention regarding Prevent-related processes following events. All instances are treated as sensitive and confidential.
94. The increase in reporting is likely to be linked to enhanced engagement with the OfS and the dissemination of guidance on serious incident reporting. It may also be related to greater partnership working with a broader range of Prevent partners including the DfE further education and higher education regional Prevent coordinators. Our experience so far has demonstrated that, on the whole, providers have followed their policies and procedures and have sought to take remedial action or reflect changes in their approach where necessary.
95. Other potential serious incidents may not be reported to us, particularly as we have picked up on some potential incidents through third parties such as the media. This suggests that further work is required to ensure that key monitoring processes are being readily adopted by providers. The importance of open and transparent lines of communication with the OfS as we move towards a more risk-based monitoring approach cannot be underestimated; indeed, by reporting potential serious incidents providers may either access further guidance and support, or positively assure us of their implementation of the duty.

Anonymised case study: Potential Prevent-related serious incident

A potential Prevent-related serious incident was reported to HEFCE by a provider that had been made aware of an event that had not followed the institution’s agreed policies and

¹⁶ The ‘Prevent-related serious incidents guidance’ is available under ‘Guidance on requirements’ at www.officeforstudents.org.uk/advice-and-guidance/regulation/counter-terrorism-the-prevent-duty/how-we-monitor/.

processes. There was concern that the failing of the policy might suggest that the provider had not fulfilled its responsibilities under Prevent. The event had also generated considerable press interest.

The provider was able to provide an update to HEFCE, to illustrate the steps it had taken in light of the allegation and to advise of its next steps. The provider was reporting through its normal internal processes, and was required to provide a formal update to its own senior management. The provider also confirmed that it had made contact with the DfE's regional further education and higher education regional Prevent coordinator. This notification and related detail was recorded by the Prevent adviser, and ongoing discussions were handled jointly by the Prevent adviser and the Prevent coordinator to provide sufficient assurance, ensure consistency and alleviate burden for the provider.

The provider reported that it would conduct an immediate exercise to ensure no other failings of Prevent-related policies, as well as a review of broader Prevent-related policies as a result of this incident. It confirmed when it expected this work to conclude and shared the findings with HEFCE when it was able to do so. The remedial actions taken by the provider to mitigate the risks of a similar incident in the future were considered and the findings were reviewed as part of HEFCE's internal processes.

96. The statutory guidance also places an expectation on RHEBs to inform us when there has been a change in their circumstances which could affect Prevent compliance. We have processed two changes in circumstance – not including changes of named Prevent contact – during the reporting period.

Supporting continuous improvement and 'What works'

97. The delegation letter from the government asked the OfS to continue to promote an environment of continuous improvement across all parts of the sector in relation to Prevent, and to support the development and sharing of effective practice among practitioners. We will continue to work closely with the government, providers, students and key sector stakeholders to achieve this.

Supporting 'What works'

98. HEFCE delivered a series of well attended 'What works' workshops in March and April 2017 that explored IT and web filtering, and welfare and equality and diversity. These workshops were very well received, giving providers the opportunity to share practice and discuss challenges. HEFCE published two blog posts following the 'What works' workshops, and produced two short guides on these themes drawing together the findings from the workshops alongside case studies of positive practice, as well as signposting to resources and support.
99. HEFCE developed a repository of case studies of positive practice to contribute to continuous improvement across the sector. This was made available over the summer of 2017 on HEFCE's website and has now been moved to the OfS website along with the output from the

'What works' workshops¹⁷. The intention is to continue to build this resource by adding new case studies identified through the annual reporting process and future 'What works' activity.

100. In May and June 2018, we delivered a second programme of 'What works' workshops in response to feedback in annual reports, information received through other monitoring processes such as our serious incident process, and consultation with sector and government stakeholders. This second tranche of national workshops explored information sharing and Prevent, and student engagement, as our findings suggest that there is a polarity of approaches and experience regarding these two areas. The information-sharing workshops covered a range of topics, including the implications of the introduction of the General Data Protection Regulation in May and ongoing requirements of data protection, as well as the internal and external barriers and opportunities to effective information in different institutional contexts. The workshops on student engagement illustrated the benefits and importance of engaging with students, and showcased some innovative approaches, as well as the barriers to engaging effectively with diverse student bodies and representatives.

Thematic review and 'deep dives'

101. HEFCE and the OfS have also undertaken thematic reviews in other areas where providers have identified a need for additional support and guidance. These included:

- a. A jointly led workshop with DfE for small and specialist providers to enable this group of providers to share effective practice and discuss some of the particular challenges they face in their institutional contexts.
- b. Co-developing a series of roundtable events in conjunction with Middlesex University to discuss collaborative partnerships and create a shared understanding of Prevent duty requirements pertaining to different types of partnerships, e.g. validated, joint, and franchised. Following on from this, we are working with colleagues from across the sector and coordinating sector-led work on collaborative partnerships to showcase a variety of responses to this complex area.

102. Building on the work undertaken in relation to IT over the last year, and recognising this continues to be an area where providers would appreciate further support, an initial thematic 'deep dive' analysis in the spring of 2018 has developed a greater understanding of the approaches being taken to IT filtering and monitoring, including identifying the key challenges and areas of effective practice.

Review of approaches to IT filtering and monitoring

103. As part of the 2015-16 Prevent annual report submission to HEFCE, providers were asked to provide detail regarding their 'approach to web filtering in relation to the Prevent duty, particularly where a decision had yet to be taken at the time of the provider's previous submission to HEFCE'.

104. Building on this, the OfS has conducted an initial scoping exercise across a sample of providers with the aim of better understanding the sector's approach to IT filtering and

¹⁷ See www.officeforstudents.org.uk/advice-and-guidance/regulation/counter-terrorism-the-prevent-duty/prevent-case-studies/.

monitoring. This exercise used a purposefully selected sample of 33 providers, approximately 10 per cent of the RHEBs subject to the duty, chosen to reflect all types of providers monitored by the OfS and based on compliance history in Prevent duty implementation.

105. Under the statutory guidance providers are required to ‘consider’ IT filtering or monitoring; this resulted in the analysis showing a variety of approaches, including monitoring, filtering or neither. It was found that 33 per cent of providers had implemented filtering and 33 per cent had implemented monitoring and 15 per cent both actively filter websites and monitor web traffic. A number of barriers to filtering and monitoring were reported by providers.

106. The OfS will continue to work with providers to foster opportunities to share practice in this area. Given the small sample size analysed for the scoping exercise and the limitations this places on the initial findings, further analysis of the wider data set would be beneficial.

Review of approaches to training

107. As noted in paragraph 71, we are undertaking more detailed analysis of the different approaches to delivering training on Prevent, including quantitative analyses of staff receiving differential types of training and of the different training materials being adopted, with a review of their effectiveness. Once we have analysed the full set of annual reports and reflected on broader feedback from the sector, including through our serious incident process, we will consider what further areas we may want to identify for thematic review.

Broader support activity

108. We have continued to support the sector through the development and refinement of training materials and resources. Following the evaluation of the training materials developed by the Leadership Foundation for Higher Education and Universities UK and funded by HEFCE and the Department for Education, we implemented a number of changes based on feedback. This included the addition of an embedded accreditation certificate for the e-learning module, for example.

109. We are currently working with partners on refreshing the Safe Campus Communities website, which hosts training materials on Prevent to help support providers comply with the duty. We will also consider what further materials may be helpful to providers in the context of revising our approach to monitoring, including which organisation hosts the site in future.

110. We have developed a number of ‘talking head’ training video case studies in partnership with Advance HE, sector representatives and Prevent partners. These were launched in July 2018 and are available on the Safe Campus Communities website¹⁸.

Further work and forward look

111. Building on HEFCE’s successful work, the OfS will continue to ensure that it consults with and supports the sector in relation to Prevent while undertaking its regulatory role. Our engagement strategy with providers will be more risk-based and will reflect individual contexts. We are prioritising engagement with those providers from which we require further evidence

¹⁸ See www.safecampuscommunities.ac.uk/training/talking-heads-videos (login required).

that they are demonstrating due regard to the duty or that require further support, for example because of greater local challenges.

112. Further work will also be undertaken to establish relationships with the Office of the Independent Adjudicator so that any feedback regarding Prevent duty implementation reaches the OfS.
113. We will continue our approach of reviewing specific areas of practice across the sector in relation to Prevent, and supporting the sharing of practice across different elements of the duty. By moving towards a more risk-based approach we will aim to offer greater opportunity for us to do more of this work, and to work with stakeholders other than providers themselves, such as students or multi-agency Prevent partners.
114. Having considered how our Prevent monitoring can be strengthened through a more risk-based and targeted approach, we have set out in our letter to the sector, 'Prevent monitoring under the Office for Students', the overarching principles and broad framework that will guide the OfS's approach to monitoring in the longer term. These principles will translate into an **updated OfS Prevent monitoring framework** which we will publish **early in 2018-19** and which will be effective from the point of publication. We will work with providers over the course of the summer as part of a process of soft consultation on the detail of our evolved approach and monitoring framework.
115. We will expect all outstanding feedback from the 2016-17 annual reports to be submitted to the OfS by **31 October 2018**. Accountability submissions from all RHEBs will be made to the OfS by **1 December 2018**, with OfS feedback to providers and the Prevent review programme in effect from **February 2019**.
116. However, while we intend to introduce an updated monitoring framework in early autumn, **2018-19 will be a transition year** as we recognise that providers will need some further time to respond to our revised monitoring arrangements.
117. The reporting of serious incidents and changes in circumstance will continue unchanged.

Annex A: Monitoring approach to date

Background

1. To date, HEFCE has assessed RHEBs' compliance with the duty through two distinct phases of work:
 - a. Phase 1: Initial assessment. An initial phase comprising a self-assessment exercise by providers to judge initial readiness (completed in January 2016) and a subsequent assessment by HEFCE of detailed evidence to demonstrate that properly thought-through policies and processes are in place (completed in December 2016).
 - b. Phase 2: Annual reporting. An ongoing process focused on monitoring the active implementation of these policies and procedures, ensuring that 'procedures and policies are properly followed and applied.' This consists of a retrospective annual report from each institution covering the previous year's activity, supplemented by risk-based Prevent reviews where significant concerns were raised. (We have now undertaken two cycles of annual reports for activity in 2015-16 and 2016-17).
2. HEFCE issued additional guidance in advance of the 2016-17 reporting cycle setting out its requirements on the type of evidence it expected to see in providers' annual reports. HEFCE's expectations were broadly similar to the submission process for the first set of annual reports covering 2015-16. However, HEFCE chose not to request further information from all providers on a specific theme. In summary, providers were expected to show evidence of:
 - risk assessments and actions plans being updated
 - external speaker and welfare policies being implemented
 - staff being trained on Prevent
 - senior managers being engaged and continued internal coordination of the Duty
 - ongoing student engagement in relation to Prevent.

How annual reports are assessed

3. The OfS took over from HEFCE a three-stage assessment process for reviewing submissions from providers. Annual reports are initially assessed by a member of staff, before being quality assured by a more senior member of staff. After assessments have been assessed and quality assured, a selection of assessments are scrutinised and validated by an internal panel of OfS staff external to the Prevent team. Decisions on assessments are taken by our chief executive, acting under delegated authority from the board.
4. This assessment process can result in one of three outcomes:
 - a. **Demonstrates due regard** to the need to prevent people being drawn into terrorism. For providers that fall into this category, we have concluded that policies and processes satisfy the requirements of the statutory guidance and that there is sufficient evidence of active

implementation (taking into account the provider's context). For some providers, this judgement was accompanied by minor feedback.

- b. **Further evidence needed** (this is a transitional category). For providers that fall into this category, we have concluded that policies and processes need improvement to satisfy requirements, or that further evidence is needed to demonstrate active implementation. Providers were given an opportunity to submit further evidence for reassessment.
- c. **Does not demonstrate due regard** to the need to prevent people being drawn into terrorism. For providers that fall into this category, we have concluded that policies and processes do not satisfy requirements, or that there is inadequate or no evidence of active implementation, or that there is significant evidence of non-implementation of policies and processes. Any providers that fall into this category are given a short window to provide further evidence. If this is not forthcoming, the provider is referred formally to the Department for Education to consider whether further formal action is needed. In addition to the ongoing monitoring process set out above, we undertake an assessment of potential Prevent-related serious incidents, reported to us by institutions themselves or by third parties, and through the changes of circumstance process that forms part of the monitoring framework. Information that arises during the course of these processes may inform our overall assessment outcome reached for an individual provider.

Further information

- 5. For further information about how HEFCE and the OfS have undertaken Prevent monitoring to date, see 'Framework for the monitoring of the Prevent duty in higher education in England' (HEFCE 2017/10)¹⁹.

¹⁹ Available at www.officeforstudents.org.uk/advice-and-guidance/regulation/counter-terrorism-the-prevent-duty/how-we-monitor/.

List of abbreviations

ACM	Academy of Contemporary Music
CTSA	Counter Terrorism and Security Act 2015
DfE	Department for Education
HEFCE	Higher Education Funding Council for England
ICR	Institute of Cancer Research
IT	Information technology
LSC	London School of Commerce
OfS	Office for Students
RHEB	Relevant higher education bodies
UCB	University College Birmingham
UCLan	University of Central Lancashire



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