

Prevent Monitoring: Guidance for Accountability and data returns

Introduction

This document provides further information and guidance to providers on the Prevent accountability and data return. OfS requires **all** providers subject to Prevent monitoring to submit accountability returns to us for **noon 3 December 2018**¹. The return will comprise of a declaration and supporting statement from the Governing Body or proprietor of the provider, and a data survey around core areas of Prevent implementation. This will provide OfS with baseline assurance and evidence that will help our wider risk assessment of whether a provider is giving due regard to duty.

Providers should return the declaration sheet and data survey via OfS' secure extranet facility. Both documents will be available to download from the extranet within six weeks of the submission deadline. We will write to providers individually with technical details of the submission through the extranet.

Declarations and accountability statement

The declarations and accountability statement is a similar requirement to the previous annual report assessment process operated by HEFCE and is mandatory. The Governing body or proprietor should seek assurance that their organisation has demonstrated due regard to the Prevent duty through the reporting period. The chair of the governing body should sign the declarations; and the governing body or proprietor should provide a short statement outlining how they have satisfied themselves in relation to completion of the declaration statements and oversight of the implementation of the duty. Responsibility for ensuring compliance with the legal duty continues to sit with the proprietor or chair of the Governing body, and therefore the signed declarations coupled with the statement are a core test of compliance.

Accountability statement

We expect providers to have well established reporting mechanisms to governing bodies and proprietors on their implementation of Prevent. We therefore expect governing bodies and proprietors to make use of these mechanisms in satisfying themselves they are discharging the duty effectively. However, governing bodies may wish to consider prompts and questions listed in the annex to the accountability statement as part of their decision making process.

Data return

The data return is a similar requirement to the previous annual report process. The data return covers core areas of the Prevent duty: welfare, external speakers and events, and staff training. We have included new data sets to understand more granular detail of the operation of key areas without the need to request a detailed report; and for further contextual data. The key changes include:

- A new data set around the number of welfare cases referred for formal specialist advice and support to provide assurance that welfare procedures are in operation in the absence of any Prevent-related welfare concerns.

¹ Providers that have not yet undergone the baseline assessment of detailed evidence and Prevent review are not subject to the accountability return. For more information regarding the monitoring of new entrants, please refer to paragraphs 79 and 80 of the *Prevent duty: Framework for monitoring in higher education in England, 2018-19 onwards*, found at: https://www.officeforstudents.org.uk/media/3e9aa5d3-21de-4b24-ac21-18de19b041dc/ofs2018_35.pdf

- New data sets on external speakers around the total number of speaker and events applications approved through the external speakers process, the number of events/speakers approved where mitigations have been introduced relating to Prevent (and freedom of speech indirectly), and the number of any speaker/event requests rejected by the process. This information will provide further contextualisation of the operation of this policy area and provide further assurance that Prevent is being implemented in a robust and proportionate manner.
- New data sets around the identification of key staff on Prevent and wider safeguarding/welfare awareness training for staff. This information provides us with greater contextualisation of staff training numbers and differentiate between specialised training for key staff and wider awareness raising for non-key staff. Both of which provides assurance around the duty being implemented effectively.

The data return is mandatory. However, given that we have refined data definitions as well as introduced new data sets we recognise that providers may not have the appropriate data collection systems in place to supply the relevant information. Providers should clarify in the supporting text boxes in the data survey where this is the case. Providers are also able to offer further context to their data sets which OfS will take account of.

How the submissions will be reviewed

The information submitted will be reviewed by OfS officers working in Prevent through December and in January to help inform our on-going risk assessment of providers. This will include reviewing the information submitted against a variety of different information and data including previous compliance judgements, information from other Prevent assessment processes such as our reportable incidents and material changes processes, information from Prevent partners, and data from sources such as HESA to help provide further contextualisation of the information submitted.

Unlike the previous annual reporting process, OfS officers will not query data or the information provided as a matter of course. We may choose to query information in exceptional circumstances, and will look to agree timescales with providers accordingly.

Outcomes and follow-up

We do not expect that we will make judgements around compliance with the duty from the contents of the submission for most providers e.g. concerns around the content of the data; though we may do so in exceptional circumstances. However, the accountability and data return is mandatory; therefore we will trigger our non-compliance process if a provider fails to submit information to us.

We will confirm with all providers our conclusions from the return. Where our review of the return and other associated information prompts a change in risk profile i.e. to higher risk, this will likely trigger formal engagement from OfS through a Prevent review meeting. Where our review results in a positive change, or no change in risk profile, this will not trigger a Prevent review as a result of the return. However, a provider could still be subject to a Prevent review meeting as part of our random representative sample population as outlined in the monitoring framework. We will write to those providers affected in due course.

Submission deadline

The deadline for submitting both the declaration sheet and the data survey is **noon 3 December**. However, if a provider has a governing body meeting due shortly after the deadline, providers should contact prevent@officeforstudents.org.uk to discuss an extension where possible.

Queries

Queries relating to the accountability and data return should be sent to prevent@officeforstudents.org.uk. Technical assistance with the submission will be available to

providers from the point we issue extranet letters with contact details provided as part of that communication.