

Office for
Students



Prevent monitoring: accountability and data return 2023

Reporting on the 2022-23 academic year

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Introduction

1. This guidance is designed to help higher education providers complete the Prevent accountability and data return (ADR) for the 2022-23 academic year. The Office for Students (OfS) requires all established providers subject to Prevent monitoring during the 2022-23 academic year to submit an accountability and data return by **Friday 1 December 2023**.
2. We have made a minor change to the information required and this is set out below.

Who is required to submit a return?

- All **established** providers that are currently monitored and have been subject to Prevent monitoring in the 2022-23 academic year.¹ This means any provider that has previously submitted an ADR, or any provider that is a new entrant and has received its Prevent review meeting outcome by 1 August 2023.
- Providers that are new entrants to Prevent monitoring but have not received a detailed assessment outcome and Prevent review meeting outcome are **not** required to submit a return.²
- Further education and sixth form colleges registered with the OfS are **not** required to submit a return as we do not act as Prevent monitor for these providers. This is Ofsted's responsibility.
- Providers that have received a letter confirming their exit from Prevent monitoring during or since the last academic year are required to report for the period until we have confirmed their exit from our monitoring regime. We will contact these providers separately.

3. Instructions about how to access the ADR forms and upload the completed return to the OfS portal will be available late October 2023. Any technical queries regarding accessing the portal and uploading the return should be sent to dfaprevent@officeforstudents.org.uk.

How we use the data

4. The data collected through the ADR informs the OfS's Prevent monitoring activity. It includes contextual information which allows us to understand a provider's approach to implementing the duty.³ The information we collect informs our risk-based approach to targeting engagement with providers that we consider to be at increased risk of not complying with the Prevent duty.

¹ Established providers are those that are subject to the duty, have been through an initial test of their compliance and go through the cycle of accountability and data returns.

² New entrant providers are those that are newly subject to the duty and are undergoing an initial test of their compliance before they are required to go through the cycle of accountability and data return.

³ See 'Prevent duty: Framework for monitoring in higher education in England 2018-19 onwards' at www.officeforstudents.org.uk/publications/prevent-duty-framework-for-monitoring-in-higher-education-in-england-2018-19-onwards/

5. Information collected through the ADR may be used in the performance of any of the OfS's functions. For example, we may use it as part of our general monitoring activities, including in relation to a provider's approach to upholding the public interest governance principle relating to freedom of speech.
6. As set out in our Prevent monitoring framework, we expect to publish relevant information and data from the ADR.⁴ This may include aggregate sector-level information on compliance and official statistics drawn from the data collected through the ADR.
7. The OfS will report to the Department for Education on a periodic basis about providers' compliance with the duty. We may also share relevant information and data on an individual provider's implementation of the duty with government and other Prevent partners, including where we have reached a view that a provider is not demonstrating due regard to the duty.⁵

Changes to the 2023 return

Summary of changes:

- We no longer require data to be returned in relation to broader welfare and safeguarding staff training in the training dataset.

8. We have decided to remove the requirement for providers to submit data about broader welfare and safeguarding training. This is because we have reviewed the data we collect from providers through this return and consider that, while we may wish to discuss it with individual providers where concerns about training have arisen, we do not need to collect it from all providers on a routine basis.
9. We believe that broader awareness-raising of relevant (safeguarding and welfare) provider policies and procedures can support a provider's ability to address Prevent-related concerns appropriately. This is because in most cases, Prevent processes are embedded into safeguarding processes.
10. However, we monitor a diverse range of providers, and the contextual information provided by the collection of data about broader welfare and safeguarding training varies significantly from provider to provider. Therefore, in the first instance we will use other indicators, such as data on key staff training or other information, to inform our risk-based approach to monitoring. This will allow us to target further engagement with providers, including requesting further information about a provider's wider training strategy where necessary.

⁴ See 'Prevent duty: Framework for monitoring in higher education in England 2018-19-onwards', at www.officeforstudents.org.uk/publications/prevent-duty-framework-for-monitoring-in-higher-education-in-england-2018-19-onwards/.

⁵ See 'Prevent duty: Framework for monitoring in higher education in England 2018-19-onwards' at www.officeforstudents.org.uk/publications/prevent-duty-framework-for-monitoring-in-higher-education-in-england-2018-19-onwards/.

Requirements for the 2023 return

11. These requirements relate to the period from 1 August 2022 to 31 July 2023. For the purposes of this return we refer to this as the academic year 2022-23

Accountability declarations

12. We require a signed declaration from the provider's governing body (or proprietor where there is no governing body). Any individual who has received delegated authority may also sign the declaration. This declaration is that the provider:

- a. Has had due regard to the need to prevent people being drawn into terrorism (the Prevent duty).
- b. Has provided to the OfS all required information about its implementation of the Prevent duty.
- c. Has reported to the OfS in a timely way all serious issues related to the Prevent duty, or now attaches any reports that should have been made, with an explanation of why they were not previously submitted.
- d. Has reviewed, and where necessary updated, its Prevent risk assessment and action plan.

Data return

13. The data return covers these areas of the Prevent duty:

- a. Welfare.
- b. External speakers and events.
- c. Staff training.

14. In each section below we have set out what information a provider must submit for each dataset as part of the ADR and definitions to explain the requirements.

Welfare

15. A provider is required to submit the information contained in Table 1 below.

Table 1: Prevent cases

Question	Islamist radicalisation	Extreme right-wing radicalisation	Mixed, unstable or unclear ideology	Other radicalisation	Total
a) Number of Prevent-related cases escalated to the point at which the	0	0	0	0	0

Prevent lead has become involved					
b) Number of Prevent-related cases which led to informal external advice being sought from Prevent partners	0	0	0	0	0
c) Number of formal external Prevent referrals	0	0	0	0	0
For each Prevent-related case, please add information about how the case originated (e.g. concerns identified from behaviour online, or through accessing material online, through external speakers or as a result of a welfare issue). Maximum 300 words.					

16. Table 1 shows the full welfare dataset that must be submitted for the ADR, including the categories of radicalisation concern into which a provider should breakdown this data to show the underpinning ideology (if any) behind each individual's case:

- a. Islamist radicalisation.
- b. Extreme right-wing radicalisation.
- c. Mixed, unclear or unstable ideology. This reflects instances where the ideology presented involves a combination of elements from multiple ideologies (mixed), shifts between different ideologies (unstable), or where the individual does not present a coherent ideology yet may still pose a terrorism risk (unclear).⁶
- d. Other radicalisation.

17. While a definitive view of the ideology may only be obtained through a subsequent external referral, a provider should be able to identify the type of concern underpinning the case.

18. A provider should also give a brief description in the text box shown in Table 1 to provide further contextual information relating to where potential or actual radicalisation cases originated from: for example, concerns identified from behaviour online, or through accessing material online, through external speakers or as a result of a welfare issue.

⁶ We note the changes to referral categories made in the Home Office's latest release (See 'Individuals referred to and supported through the Prevent Programme, April 2021 to March 2022', at <https://www.gov.uk/government/statistics/individuals-referred-to-and-supported-through-the-prevent-programme-april-2021-to-march-2022>). However, we have chosen to keep the categories we used in the ADR 2021-22 for the ADR 2022-23.

19. The cases reported may be entered in more than one data question response. For example, if a case was escalated to the Prevent lead and informal external advice was sought in relation to this case, the case data count should appear in both boxes for question a) and b).

20. Table 2 below provides a definition for each question in the welfare dataset to explain what is required.

Table 2: Definitions for Prevent cases

Dataset	Definition
a) Number of Prevent-related cases escalated to the point at which the Prevent lead has become involved	This refers to cases reported to a provider's Prevent lead (or appropriate group or committee).
b) Number of Prevent-related cases which led to informal external advice being sought from Prevent partners	This refers to cases where a provider has sought advice and information from a multi-agency partner for a Prevent-related case, e.g. DfE Prevent co-ordinator.
c) Number of formal external Prevent referrals	This refers to where a provider has made a formal referral externally regarding a radicalisation case.

Events and external speakers

21. A provider is required to submit the information contained in tables 3 and 4 below.

Table 3: Events and external speakers managed through the external speakers process

Dataset
a) Total number of events or speakers approved through the external speakers process
b) Total number of events or speakers approved subject to any mitigations or conditions
c) Number of events or speakers approved subject to any mitigations or conditions due to Prevent-related risks

22. An event or speaker count may be entered into all three questions if applicable. For example, if an event were approved, but with a mitigation and that mitigation was due to Prevent-related risks, the data count should be entered into questions a), b) and c) responses.

Table 4: Events and speakers rejected through the external speakers process

Dataset	Health and safety	Procedural matters	Reasons related to Prevent risk	Other matters	Total
d) Total number of events or speakers rejected	0	0	0	0	0
For each case, please add information about the reasons for rejection. Maximum 300 words.					



23. As shown in Table 4, a provider will need to provide a breakdown of question (d) to show the reason that each event or speaker was rejected, using the following categories: health and safety, procedural matters, reasons related to Prevent risks or other matters.
- a. 'Procedural matters' relates to the need for the provider to adhere to its policy and procedure. For example, where the timescales for submission of a request as specified in a policy were not met so there was insufficient time to make a decision about a case and it was therefore not approved on that basis.
 - b. 'Health and safety' relates to a risk of accident or injury. For example, where the nature of the event itself is deemed to present a risk to safety or a venue offering sufficient capacity for an event to go ahead is unavailable.
 - c. Reasons related to Prevent risk relates to the risk of radicalisation. For example, where the speaker has previously been found to have promoted a proscribed terrorist organisation.
 - d. Rejections because of 'Other matters' relates to any other reason.
24. We recognise that there may be several reasons for an event or speaker to be rejected; however, for the purpose of this data we are asking for one primary reason to be identified. Providers can give further information in the narrative box.
25. With the exception of question a) where an estimate can be made to the nearest 10, providers must submit accurate figures.

Table 5: Definitions for event and speaker cases

Dataset	Definition
a) Total number of events or speakers approved through the external speakers process	This refers to the total number of events or speakers approved through a provider's external speakers and events process, i.e. not related to the delivery of the academic curriculum. This figure can be an estimate to the nearest 10.
b) Total number of events or speakers approved subject to any mitigations or conditions	This refers to the total number of events or speakers that have been approved (through the external speakers and events process) subject to some form of mitigation in order to proceed, or where approval is subject to conditions being met by the organiser.
c) Number of events or speakers approved subject to any mitigations or conditions due to Prevent-related risks	This refers to the number of events or speakers that have been approved (through the external speakers and events process) subject to some form of mitigation in order to proceed or where

	approval is subject to conditions being met by the organiser because during the risk assessment process the provider has identified a Prevent-related risk i.e., where it is considered there is a risk of people being drawn into terrorism.
d) Total number of events or speakers rejected	This refers to the number of events or speakers that have been rejected after consideration through the provider's external speakers and events process, including where an individual speaker has been rejected but the event itself has still gone ahead.

26. Table 5 provides a definition of each question in the events and external speakers dataset to explain what is required.

Training

27. A provider is required to submit the information in Table 6 below.

Table 6: Training

Dataset	Definition
a) Number of staff identified as key in relation to the Prevent duty	This refers to the current number of staff a provider has identified as key in relation to Prevent implementation.
b) Number of key staff receiving induction Prevent training	This refers to the number of staff identified as key in relation to the Prevent duty that have received training related to their Prevent role or responsibility.
c) Number of key staff receiving refresher Prevent training	This refers to the number of staff identified as key in relation to the Prevent duty that have received refresher training related to their Prevent role or responsibility.

28. There is no accompanying text box for this training dataset as we are not expecting any narrative in relation to the training data. Should we have any concerns or need a clarification, we will contact the provider directly to seek further information. We believe this is a proportionate approach to understand the context of this data. We already hold information about how providers identify and train staff from our previous assessments of detailed policies and processes and Prevent review meetings.

How the ADR will be assessed

29. The information submitted in the ADR by each provider will be reviewed in early 2024, alongside other information we hold, including:

- a. Previous Prevent compliance judgements.
 - b. Information from other Prevent assessments, e.g. change of circumstance or serious incidents.
 - c. Information from our regulation of registered providers more generally.
 - d. Intelligence from Prevent partners, including the Charity Commission, and DfE Prevent Co-ordinators.
 - e. Data from sources such as the Higher Education Statistics Agency (HESA) to help provide further contextualisation.
30. We will use this information to inform our view of the risk of non-compliance with the Prevent duty. This risk assessment will allow us to identify any provider that we consider needs further targeted Prevent monitoring.
31. We may query information submitted by a provider in its ADR, for example, where we consider the data to be inaccurate or incorrect, or to confirm that the appropriate individual has signed off the accountability declaration. We will set a clear timescale for submission of any amended or additional information.

Outcomes and follow-up

32. As with previous ADRs, we do not intend to issue a compliance judgement for each provider following our assessment.
33. We will continue to target our engagement on those providers where there is cause for concern, to seek further information and evidence that a provider is demonstrating due regard to the Prevent duty. In these instances, when we have completed that engagement with an individual provider, we will issue a compliance judgement setting out whether the provider:
- a. Demonstrates, or does not demonstrate, due regard to the Prevent duty.
 - b. Should take further action(s).
34. Where we consider that a provider is not complying with the Prevent duty, i.e. it does not demonstrate due regard, this is likely to result in a referral to DfE. Further information about how we respond to non-compliance with the Prevent duty can be found in paragraphs 91-94 of 'Prevent duty: Framework for monitoring in higher education in England' (OfS 2018.35).⁷

Submission deadline

35. The data return is **mandatory**, and the deadline for submitting both the declaration sheet and the data survey is **Friday 1 December 2023**.

⁷ Available at www.officeforstudents.org.uk/publications/prevent-duty-framework-for-monitoring-in-higher-education-in-england-2018-19-onwards/.



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