


Implementation of the Prevent duty in the higher education sector in England: 2015-16

This report sets out HEFCE's findings from monitoring the first year of implementation of the Prevent duty in the higher education sector in England.

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Implementation of the Prevent duty in the higher education sector in England: 2015-16

To	Heads of higher education providers funded by HEFCE Heads of other relevant higher education bodies
Of interest to those responsible for	Governance, Administration, Student services, Information technology, Security, Chaplaincy, Students' unions, Higher education policy, Counter-terrorism policy
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Executive summary

Background

1. Since September 2016, 'relevant higher education bodies' 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. In doing so, 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 Government.
2. The Government appointed HEFCE to monitor implementation of the duty across the higher education sector in England, covering 321 higher education providers. Alternative arrangements apply in Wales and Scotland.
3. To demonstrate 'due regard' to the duty, higher education providers 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.
4. The first year of HEFCE's monitoring work has focused on the first part of this: ensuring that providers have the appropriate policies and processes in place. Every provider has submitted detailed evidence which HEFCE has assessed against the requirements of the statutory guidance. This assessment resulted in one of three initial outcomes:
 - a. **The evidence satisfied the requirements of the guidance.**

A provider fell into this category if the evidence submitted demonstrated that:

 - i. Processes were in place for **sharing concerns about individuals** who might be vulnerable to being drawn into terrorism where these are identified. Providers were expected to show that there were appropriate internal welfare mechanisms and escalation processes, including making a Prevent referral leading to discussion at a

locally coordinated multi-agency Channel panel (which can include local safeguarding leads, education, NHS and other health services, social services, and the police) where needed.

ii. Staff were undertaking **relevant Prevent-related training**, including ensuring that key personnel understood how to respond when concerns were identified.

iii. Policies were in place to **identify and manage the risks** that any external speakers might express extremist views that risk drawing people into terrorism, while balancing this with their existing legal duties relating to freedom of speech.

b. The evidence needed improvement in key areas.

Where this initial outcome applied, this indicated that, while work to implement the duty was under way, **further work was needed** in one of these key areas before we could take assurance that the provider had responded to the guidance appropriately – for example, where a provider did not have a clear process for identifying and responding to welfare concerns, or did not have a sufficiently robust approach to managing external speakers and events.

c. The evidence demonstrably did not satisfy requirements.

Where a provider was found to be not satisfying requirements, this indicated that we found that **plans for implementing the duty were not in place or were not credible**. In these cases providers were given a short window to provide further evidence. If this was not forthcoming, or was insufficient to address concerns, the provider was referred formally to the Department for Education to consider whether further formal action was needed.

5. Our second year of monitoring work will focus on whether providers can demonstrate that those policies are implemented actively and are working effectively. We will establish this through:

- **annual reports** from all providers, setting out evidence and data related to their implementation of the duty
- risk-based **Prevent reviews** to gather further evidence where needed.
- investigation of **serious Prevent-related incidents**, reported to us by institutions themselves or by third parties.

Findings from our monitoring work

Headline findings

6. All **321 providers** submitted detailed evidence to us between April and August 2016.

7. From our review of the detailed evidence submitted, **84 per cent of providers satisfied** us that they had responded appropriately to the statutory guidance. This included having robust policies in place for the management of external speakers and events, clear processes for dealing with safeguarding concerns, and appropriate plans for training staff.

8. A total of **15 per cent of providers needed to improve policies** in some key areas before they satisfied requirements, although they demonstrated evidence of active engagement with the duty. Where we concluded that a provider's policies and processes needed improvement, it was

required to agree an action plan to resolve these issues. Of the 49 providers in this category, **24 have since completed all outstanding actions** and been reassessed as satisfying requirements. The remainder will have done so by early 2017.

9. **Only two providers (1 per cent) did not satisfy us** that they were engaging with the requirements of the duty. One of these subsequently provided further evidence which meant it was reassessed as 'needing improvement'. The other provider no longer has specific course designation (for reasons unrelated to our assessment of its Prevent return) and as a result is no longer subject to the statutory duty; however, as for all providers assessed as not satisfying requirements, HEFCE has provided details to the Department for Education.

Thematic findings

10. Most providers had identified the risks pertinent to their own context and developed appropriate, tailored responses. Generally, providers demonstrated clearly that they had understood the requirements of the duty and how to implement these in a proportionate way:

- a. **External speakers and events:** providers showed a strong understanding of their responsibilities around freedom of speech and had responded pragmatically to the requirements of the duty. Most providers were balancing these by putting in place strong policies for assessing and managing the risks around any speaker or event – **93 per cent** demonstrated they already had robust processes in place.
- b. **Leadership and partnership:** across the sector we found clear evidence of engagement by senior leaders, governors and proprietors in implementing the duty. Around **90 per cent** of providers also demonstrated that they had partnerships in place with other Prevent-related agencies – although these varied depending on the size and context of the provider.
- c. **Risk assessment and action plan:** all providers submitted risk assessments and action plans assessing the risks identified. Generally these were appropriate to institutions' circumstances and demonstrated a strong understanding of where risks might occur.
- d. **Staff training:** more than **90 per cent** of providers demonstrated that they had appropriate plans in place for training staff to carry out Prevent-related functions and understand how to recognise and respond to concerns about vulnerable individuals.
- e. **Welfare, chaplaincy support and pastoral care:** the vast majority of providers – **88 per cent** – demonstrated that they had clear processes for sharing and escalating concerns about vulnerable individuals internally, and for sharing these where necessary with external multi-agency partnerships (including referring to Prevent and discussion at a Channel panel where appropriate).
- f. **Information technology (IT) policies:** this was the area where the most providers identified that they still had further work to do to meet the requirements of the guidance in full. Although most providers had policies and processes in place, around a third still needed to do more work to ensure these responded fully to the duty. We have asked providers to submit further information through the first annual reports.
- g. **Students, students' unions and societies:** we found that providers were generally working closely with students and student representatives to implement the duty – **96 per cent** demonstrated that they were consulting students on the policies they were putting in

place. We also found that an overwhelming majority of providers demonstrated clearly how institutional policies, such as those around external speakers and events, applied to students' unions and societies.

11. Where providers were found not yet to have appropriate policies in place, the most common issues were slow progress in updating policies to respond to the duty. In a small number of cases, providers had misunderstood the intention of the duty and needed further external support to revise policies which were inappropriate (for example, welfare policies that would result in concerns being referred externally on a quarterly basis rather than promptly as they arise). In other cases, we expected providers to strengthen or formalise policies to ensure they were sufficiently robust.

Supporting 'what works'

12. Throughout the first year of the duty we have engaged actively with all providers subject to the duty and provided a range of advice and guidance, including: working with stakeholders to provide workshops and events for senior managers; funding the Leadership Foundation for Higher Education to develop a suite of sector-specific online training materials; and providing specialist support for governing bodies and proprietors.

13. Building on this, from spring 2017 HEFCE will carry out a series of 'deep dives' into particular areas of the duty, culminating in publications setting out examples of approaches that have worked for different institutions.

Action required

14. This report is for information only.

Background and introduction

15. Under the Counter Terrorism and Security Act 2015 a range of bodies, including ‘relevant higher education bodies’¹, are required to ‘have due regard to the need to prevent people from being drawn into terrorism’. In doing so, higher education (HE) providers must have ‘regard’ to two sets of statutory guidance: one general set for all bodies affected by the duty and one specifically for the higher education sector².

16. The Prevent Strategy, published in 2011, set out the Government’s approach to aiming to stop people from becoming terrorists or supporting terrorism. This included working with particular sectors and institutions to address the risks of radicalisation. Many HE providers engaged with the Prevent Strategy before the legal duty was introduced. The Prevent duty built on this by placing consistent expectations on all providers.

17. To demonstrate that they are having due regard to the duty, the statutory guidance makes clear that providers must ensure that ‘**properly thought through policies and processes are in place**’, and that ‘**these procedures and policies are properly followed and applied**’. Providers are expected to implement the duty in a proportionate way, considering their own context and risks.

18. HEFCE has responsibility for monitoring implementation of the duty by ‘relevant higher education bodies’ in England, including:

- HEFCE-funded HE institutions
- alternative providers with specific course designation
- other providers that offer higher education to more than 250 students
- the autonomous colleges, schools and halls of the Universities of Cambridge, Durham and Oxford.

19. Alternative arrangements apply in Wales and Scotland. Ofsted is responsible for monitoring implementation of the duty at further education colleges, including in relation to any HEFCE-funded higher education provision offered by further education colleges.

20. HEFCE published a monitoring framework setting out a three-phase approach to monitoring whether established higher education providers are having due regard:

- a. A **self-assessment exercise** to judge initial readiness. A summary of the outcomes of this exercise is included at Annex B.
- b. Submission of **detailed evidence** demonstrating that properly thought through policies and processes are in place. This report focuses predominantly on our assessment of this evidence.
- c. An ongoing process focused on monitoring **active implementation** of these policies and procedures, ensuring that ‘procedures and policies are properly followed and applied’. This includes submitting an annual report to HEFCE, supplemented by risk-based in-depth

¹ A full definition of what makes a higher education provider a ‘relevant higher education body’ is included at Annex A of the non-statutory advice note published by HEFCE in September 2016, available at www.hefce.ac.uk/reg/prevent/framework/#advice.

² Both sets can be found at <https://www.gov.uk/government/publications/prevent-duty-guidance>.

reviews³. The first annual reports were submitted in December 2016 and we will publish information on our findings from these in summer 2017.

Methodology for assessing detailed evidence

21. In implementing the duty, providers should 'have regard' to the two relevant sets of statutory Prevent guidance. The statutory guidance sets out that providers should:
- a. **Assess the risks** of where and how students, staff and others could be drawn into terrorism and **formulate an action plan** in response, considering how relevant institutional policies might need to be revised.
 - b. Put in place processes for **sharing concerns about individuals** who might be vulnerable to being drawn into terrorism where these are identified – including appropriate internal welfare mechanisms and clear processes for making external referrals to locally coordinated multi-agency 'Channel' teams (which can include local safeguarding leads, from education, health and social services, psychologists and the police) for support where needed.
 - c. Ensure **appropriate staff are trained** to recognise signs of vulnerability and know how to respond, and undertake any other necessary Prevent-related training.
 - d. Have robust processes to **identify and manage the risks** that any external speakers might express extremist views that risk drawing people into terrorism, while balancing this with existing legal duties around freedom of speech.
22. Providers should also demonstrate that:
- they have **engaged and consulted students** on their approach
 - there is 'sufficient' **chaplaincy and pastoral support** available for students
 - there are 'clear and widely available' policies for the management of any **faith facilities**
 - they have updated **information technology (IT) usage policies** to reflect the duty, including considering how to manage legitimate access to security-sensitive materials for research or teaching purposes
 - they have considered the use of **IT filtering tools** as part of their overall approach
 - they have established clear expectations on **students' unions and societies**.
23. All providers were required to submit comprehensive documentation demonstrating that they had responded appropriately to these statutory requirements⁴. For every provider this

³ We have set out further information about our ongoing approach to monitoring in the 'Updated framework for the monitoring of the Prevent duty in higher education in England' (2016/24) which can be found at www.hefce.ac.uk/pubs/year/2016/201624/.

⁴ Providers were required to submit evidence in three tranches:

- **1 April 2016:** providers that receive HEFCE funding (with the exception of the Universities of Oxford, Cambridge and Durham, the Conservatoire for Dance and Drama, and the British School of Osteopathy) ('funded providers')
- **1 June 2016:** alternative providers with specific course designation (such that some students can receive student loan funding) ('alternative providers')

included a full Prevent risk assessment, action plan, and external speakers and events policy, plus suitable evidence to address the other requirements set out above. Providers were asked on a voluntary basis to provide data about their implementation of Prevent; a summary of this data is included at Annex C.

24. HEFCE assessed this detailed evidence against the requirements of the statutory guidance, to identify any areas which had not been addressed sufficiently. Following our assessment every institution received an individualised letter, setting out our feedback on its submission and one of three overall outcomes:

a. The evidence satisfied the requirements of the guidance.

A provider fell into this category if the evidence submitted demonstrated that the provider had responded effectively to the guidance and had **key policies and processes in place**.

b. The evidence needed improvement in key areas.

Where a provider was found to need improvement, this indicated that, while work to implement the duty was under way, **further work was needed** on key policies and processes before we could take assurance that the provider had responded to the guidance appropriately – for example, where a provider did not have a clear process for identifying and responding to welfare concerns, or did not have a sufficiently robust approach to managing external speakers and events.

c. The evidence demonstrably did not satisfy requirements.

Where a provider was found to be not satisfying requirements, this indicated that either we found that **plans for implementing the duty were not in place or were not credible**. In these cases providers were given a short window to provide further evidence. If this was not forthcoming the provider was referred formally to the Department for Education to consider whether further formal action was needed.

25. A full list of providers monitored is included at Annex A.

Section 1: Headline findings

26. Generally we found strong evidence of engagement with the duty. All providers submitted evidence to the required timeline, demonstrating a strong commitment from across the sector to effective implementation of the duty. Of the 321 providers assessed:

a. **84 per cent** demonstrated that they had put policies and processes in place which met the requirements of the guidance.

b. **15 per cent** submitted evidence that needed improvement in key areas, although they did demonstrate that they were actively engaging with the requirements of the guidance.

-
- **1 August 2016:** other alternative providers without specific course designation; the Universities of Oxford, Cambridge and Durham and the Conservatoire for Dance and Drama; and the latter's constituent autonomous colleges and halls ('other providers').

c. **1 per cent** submitted evidence which we felt did not satisfy the requirements of the guidance and did not demonstrate sufficient engagement with the duty.

27. Where we found that the evidence submitted by a provider needed improvement, we issued feedback on the areas which needed strengthening and agreed an action plan with an agreed timetable to resolve these issues. Of the 49 providers whose policies and processes needed improvement, **24 have since resubmitted evidence** demonstrating that they have resolved outstanding issues and are now meeting requirements. Action plans are in place with the other providers which mean that all outstanding issues should be resolved by spring 2017. If we do not see sufficient progress from providers this could result in being reassessed as 'not satisfying' requirements. Further detail of some of the issues identified is set out in our thematic findings in paragraphs 29 to 81.

28. Two providers were assessed as not satisfying requirements, on the grounds that the evidence submitted initially demonstrated very little or no evidence of engagement with the duty. One of these subsequently provided further evidence which meant it was reassessed as 'needing improvement'. The other provider no longer has specific course designation (for reasons unrelated to our assessment of its Prevent return) and as a result is no longer subject to the statutory duty; however, as for all providers assessed as not satisfying requirements, HEFCE has provided details to the Department for Education.

Section 2: Thematic findings

29. Taking the requirements of the statutory guidance, we considered the evidence provided against seven themes (presented in the order they appear in the statutory guidance):

- external speakers and events
- leadership and partnership
- risk assessment and action plan
- staff training
- welfare, chaplaincy support and pastoral care
- IT policies
- students, students' unions and societies.

30. Against each of these themes we have set out a summary of our findings, including areas where we identified improvement needed or elements of strong practice. Under each theme there are also case studies from particular providers. Every provider is expected to implement the duty in a proportionate manner which fits with its context; these case studies are intended to reflect effective approaches particular providers have taken, rather than generic 'best practice' which others should adopt.

External speakers and events

31. The guidance sets out that providers should have processes in place for assessing and managing the risks relating to any external speakers or events. In making decisions about events, providers need to take into account their existing duties to ensure freedom of speech and consider academic freedom. Processes should cover events organised by students, staff or third

parties, whether held on or off-campus, and make clear what is required for an event to go ahead.

32. **The vast majority of providers (93 per cent)** demonstrated that **robust processes were in place** which met the requirements of the guidance. We saw clear evidence that HEFCE-funded providers generally understood their responsibilities under the Education (No. 2) Act 1986⁵ to ensure freedom of speech within the law, and have acted pragmatically to balance these with the requirements of the Prevent duty. In practice, providers have done so by putting in place consistent systems which enable them to carry out 'due diligence' on external speakers before events are approved, and to identify any risk of unlawful speech which should not be allowed to go ahead, or any risks which might need to be managed to allow an event to proceed safely. We saw evidence of strong processes for assessing the risks around events organised by students and staff, which ensured that events identified as 'high-risk' could be escalated to an appropriately senior level for a decision to be taken on what mitigation might be needed. Further information is included in paragraphs 41 to 43 about particular incidents which have been reported to us.

33. Stronger policies clearly documented mitigating actions which could be taken to ensure that risks around events could be managed and the events enabled to proceed safely – such as:

- clear processes for ensuring that balanced platforms can be put in place as appropriate where speakers are assessed as high-risk
- improving the selection and training for chairs of events to ensure they are equipped to enable challenge and debate
- ensuring that approval routes are communicated clearly to all staff, students and third-party organisations
- putting in place 'codes of conduct' for speakers to ensure that they are aware of institutional values and expectations
- specialist training for staff involved in booking and approving events.

34. We also saw evidence that different types of provider were implementing their responsibilities around speakers in an appropriate and proportionate way. Smaller providers that hosted fewer speakers or only held events related to the curriculum put in place lighter touch arrangements than large universities, which still enabled them to identify and manage risks where appropriate.

Case study: Falmouth University

35. The institution revised its existing freedom of speech and lawful assembly policy so that it now makes explicit reference to the duty and the need to consider whether extremist views might be expressed which risk drawing people into terrorism. This policy clearly states the institution's commitment to freedom of speech, but recognises that this is a qualified right

⁵ These provisions do not apply to alternative providers, although the letter from the Secretary of State to HEFCE delegating responsibility for monitoring implementation of the duty suggests that all relevant higher education bodies should have regard to the need to ensure freedom of speech on campus and the importance of academic freedom, whether or not they are legally bound to do so. The delegation letter can be found at www.hefce.ac.uk/reg/prevent/.

and clearly sets out the parameters which apply. The institution has implemented clear processes for assessing risk and a procedure for escalating any concerns.

36. The provider's context makes this more complex as, because they share campus facilities, the students' union at Falmouth also represents students from the University of Exeter.

This means that the process has to be operated jointly by both universities, with high-risk events requiring approval from senior managers at both. The policy sets out when these arrangements apply and makes clear how approvals will operate in these cases.

Case study: Futureworks

37. Futureworks hosts relatively few external speakers and these are largely professional speakers related to the curriculum. The provider accordingly put in place a process which reflected this context but still allowed it to assess and mitigate risks in a suitable fashion. This recognises that the majority of requests will be straightforward and can be handled without escalation, but some may require further consideration and approval.

38. Event organisers undertake an initial risk assessment, including checking whether the proposed speaker has been known to express views which might constitute 'unacceptable conduct'. The policy sets out clearly the kinds of conduct which are unacceptable, including inciting hatred, encouraging or promoting acts of terrorism, and spreading intolerance. Once this initial assessment has been carried out it must be countersigned by a senior manager. Only where a speaker is identified as 'high-risk' through this initial process is an event referred to a higher level for approval.

39. **Only 7 per cent of providers** had yet to meet all of these core requirements. In these cases issues included:

- policies which were still undergoing revision in response to the duty (in these cases, providers had existing policies to manage events but these were assessed as not yet sufficient to meet requirements)
- policies which did not make sufficiently clear what was required for events to go ahead, or what mitigations could be imposed to address any identified risks
- insufficient detail of the process for carrying out 'due diligence' on speakers, which meant we could not be assured that appropriate risk assessment would take place
- processes which were too fragmented and did not set out a clear enough route for approval.

40. We also determined that one provider's policies did not sufficiently reflect its responsibilities around freedom of speech, and needed revising to ensure that legal but controversial events were not prevented from taking place. However, through our monitoring work we have seen no examples of events being cancelled as a result of the duty.

Serious incidents

41. In addition to the formal evidence submitted by providers, HEFCE also receives reports of serious Prevent-related incidents, either from institutions themselves or third parties (including individuals, the media or other organisations involved in the delivery of Prevent). Throughout the first year of our monitoring work we have had several such reports in relation to external

speakers and events. Where an incident is reported to us we discuss this with the provider to ascertain the cause and nature of the incident and agree whether a formal report of the incident is required. We then consider this report and assess whether or not the provider has followed its policies and processes appropriately in the circumstances, and whether it has learned any lessons as a result.

42. An incident occurring is not in itself a sign that a provider is not exercising 'due regard' to the duty – instead we look for evidence of how effectively risks have been managed. In relation to external speakers and events, we expect that providers should demonstrate that risks have been assessed properly and appropriate mitigations put in place before an event is allowed to go ahead. However, providers must balance this with their existing responsibilities to ensure freedom of speech – we therefore would not expect senior managers at institutions to cancel events or prevent particular speakers from taking part unless they have reason to believe that risks cannot be mitigated.

43. In relation to the incidents reported to us this year, we found evidence in all cases that providers were having regard to the duty, although we did identify a number of areas for providers and Government to consider further in relation to future events. These included the following:

- a. Institutions should ensure that they have robust oversight in place around events organised or sponsored by students' unions or societies to assure themselves that risks are being suitably managed and mitigated. We looked for evidence of this from all providers as part of our assessment process.
- b. Risk assessments of external speakers should cover both the individual speaker and any organisations they belong to. Providers should carry out proper due diligence even where they have hosted a particular speaker previously.
- c. External speakers and events policies should consider how to cover any materials provided by third parties for events.

Leadership and partnership

44. Senior ownership of the Prevent duty was evident across the sector; **nearly 100 per cent of providers** demonstrated evidence that **senior managers, governors and proprietors were actively engaged** in implementing the Prevent duty. Evidence of this varied according to providers' contexts, but examples included:

- identifying a named Prevent lead who acts as a single point of contact, with this role generally sitting with a member of the senior leadership team
- forming a Prevent steering group with senior membership from across the institution
- undertaking specific training aimed at leaders
- senior staff taking part in collaborative activity with Prevent partners (for example, local multi-agency Prevent boards or groups with other providers in their region)
- regular scrutiny of Prevent plans by governing bodies or proprietors.

45. **Around 90 per cent of providers** also provided evidence that they had **appropriate local partnerships** in place. Again, 'appropriate' partnerships varied across different providers. For smaller providers, we expected as a minimum that they should have made links with their local

Department for Education Further Education and Higher Education Prevent Coordinator. For larger providers, we expected to see evidence of closer engagement with the Coordinators and other Prevent partners, such as local authority or police Prevent teams – for example, taking part in local Prevent boards. Other examples of strong practice included providers in particular regions forming collaborative groups to share experience and discuss implementation. In some cases, this even led to the development of shared approaches.

Case study: University of Liverpool

46. In response to the introduction of the duty the institution created a Prevent working group chaired by the Deputy Vice-Chancellor with representation from senior staff across a range of key areas. The working group reports directly to the executive team and has regular oversight from the university's council. The wide membership of the working group enabled the institution to identify risks quickly and manage them strategically, and to ensure that necessary actions were delivered effectively.

47. The provider built strong relationships with the Department for Education Higher Education and Further Education Prevent Coordinator, who has delivered tailored training to the working group and executive team. It has also developed links with other partners, including putting forward a senior representative to sit on the local Prevent Steering Group.

Case study: Architectural Association School of Architecture

48. Despite being small and specialist, the provider formed a Prevent working group consisting of senior members of staff from different areas of the business, and undergraduate and postgraduate student representatives. The working group has oversight of the development of the provider's risk assessment and action plan, with responsibility for implementation of these actions sitting at a senior level. The provider has appointed a designated safeguarding officer who has operational responsibility for the Prevent duty and liaises with Prevent partners such as the regional Department for Education Coordinator.

Case study: Buckinghamshire New University

49. Recognising that the Prevent duty required the active involvement of senior managers, the university apprised its governing council of the requirements of the statutory duty, beginning in January 2015. The university also ensured that its executive board received regular updates and directly engaged in the university's implementation of Prevent. In coordinating a cross-institutional approach to Prevent, the university established a Prevent Duty Advisory Group whose membership included staff from student support, human resources, senior administrators, and representatives from the students' union. This group then effectively managed and coordinated the development of the university's risk assessment and action plan, as well as amendments to existing policies and procedures to reflect the duty. The university also ensured that it had close links with local Prevent partners, including membership of the local Prevent Board and liaison with the Prevent Coordinator at Thames Valley Police.

50. **Around 10 per cent of providers did not yet demonstrate** evidence of appropriate partnership arrangements. Most of these were alternative providers based in London, which had had little or no engagement with the Prevent Strategy before the duty came into force. These were mostly very small and specialist providers that would be likely to have only limited contact

with Prevent partners; however, these providers will be required to take steps to put appropriate links in place.

Risk assessment and action plan

51. All providers had undertaken a **Prevent risk assessment** and produced an **action plan** addressing the risks identified, although the overall quality of risk assessments was variable. The majority of risk assessments were strong, drawing on specialist advice (for example, from the Prevent Coordinators) and considering institution-specific factors. In general, these providers demonstrated that they had considered carefully how the duty applied in their own context.

Case study: Cliff College

52. As a small evangelical college, the provider faced a very different risk profile from many other higher education providers. Although identifying itself as a 'lower risk' environment, the provider still carried out a full assessment addressing all environmental and institutional risks and identifying how to mitigate these in a proportionate way. The provider then set out an action plan with actions relating directly to those risks, with responsibilities assigned clearly to senior members of staff. The action plan identified how the provider was interpreting the requirements of the statutory guidance in a way which worked in its own institutional setting – for example, by updating statements about the institution's ethos to reflect Prevent.

Case study: University of Salford

53. The institution carried out a thorough risk assessment setting out the probability and impact of a range of different risks, and potential mitigating actions to manage them. The action plan related to the risk assessment demonstrates clear oversight of the duty at a senior level, and includes equality analysis of proposed actions. The latter ensures that equality and diversity are at the forefront of its planning, and ensures it can successfully balance its new obligations under the Prevent duty with existing equality and diversity legislation.

54. However, a small number of risk assessments were too narrowly focused and did not demonstrate understanding of local context or reflect the relative importance of different risks. We have put further support in place for these providers, including publishing further advice⁶. Around 1 per cent of providers submitted risk assessments which we felt did not reflect accurately the risks in their particular context – these providers were required to revise and resubmit urgently.

Staff training

55. We expected to see that providers had plans in place to ensure that appropriate staff had the training needed to carry out Prevent-related functions effectively – for example, how to recognise and respond to concerns about vulnerable individuals. **More than 90 per cent of providers** demonstrated that they had **appropriate plans** already in place. Particularly strong examples included those which set out a tiered approach to training, with different resources used for different groups (such as specific training for senior leaders who have strategic oversight of implementation). Others took a more uniform approach and put all staff through the same basic level of training.

⁶ This advice note can be found at www.hefce.ac.uk/reg/prevent/framework/#advice.

Case study: Point Blank

56. Point Blank has actively drawn on a range of external support and expertise to meet the identified training needs of its staff. This is tailored to suit different groups of staff with different responsibilities, and includes the online modules from the Leadership Foundation for Higher Education as well as workshops run by HEFCE and the college's validating partner.

Case study: Durham University

57. After senior members of staff undertook a 'train the trainer' course hosted by the local police force, the university worked with external Prevent partners to develop bespoke safeguarding training which is delivered through workshops and online courses, enabling it to set Prevent issues firmly in its own institutional and geographical context.

58. The provider identified clearly the staff to receive this training and the reasons why, including frontline staff with responsibility for student welfare support. This was also extended to sub-contracted security staff.

Case study: Norland College

59. As a relatively small provider Norland has taken an approach to implement training that not only identifies a tiered approach for key staff with specific responsibilities, but also raises wider awareness. The college invited the local Department for Education Higher Education and Further Education Prevent Coordinator to deliver a workshop to all members of staff. To ensure this wider awareness is embedded on an ongoing basis, the college has incorporated Prevent into its core training for all staff and the Board of Directors.

Case study: University of Essex

60. The university set out a comprehensive tiered strategy for staff training with a clear rationale behind its selection of 'relevant' staff, setting out the content of training packages and the intended training outcomes. To ensure that key staff have an understanding of how and when to refer concerns, and the university support services available, all staff with regular direct contact with students undertake face-to-face Workshop to Raise Awareness of Prevent training, which is the institution's preferred style of delivery. All new staff have access to the training sessions and the university will consider online training if there is a direct need.

61. Training is tailored to different levels of staff: senior managers involved in decision-making are given detailed training in understanding extremist ideologies, and senior leaders (including governors) undertake awareness training to understand their responsibilities.

62. Where providers did not meet these requirements, this generally meant some staff had already undertaken training but the provider had yet to develop training plans fully, or did not demonstrate that those plans would mean that all relevant staff would have the appropriate understanding and knowledge. This was typically because plans were too narrowly focused rather than reflecting the need for broader awareness-raising.

Welfare, chaplaincy support and pastoral care

63. We looked for evidence that providers had a clear process for sharing and escalating concerns about vulnerable individuals, including, where necessary, through to external multi-agency partnerships to access further support for those individuals (through the Channel

programme⁷). We expected that this should be supported by appropriate training arrangements, relationships and, if appropriate, information-sharing agreements.

64. Our assessment showed that **88 per cent of providers** submitted evidence which demonstrated that they were **already meeting these requirements**. Generally providers recognised that safeguarding the welfare of students and staff lay at the heart of the Prevent duty, and cast their responses accordingly. The strongest returns showed careful consideration of how the requirements of the duty should sit with existing welfare and safeguarding processes, with many using well-established internal mechanisms for dealing with concerns and ensuring appropriate support is offered.

Case study: University of Cambridge

65. As a result of its collegiate nature, the University of Cambridge has a complex structure which created particular challenges in ensuring that there were clear routes for escalating and dealing appropriately with any welfare concerns identified. The provider reviewed all existing safeguarding and welfare arrangements, including personal tutor arrangements and student support services. To ensure that referral procedures were clear in all cases the university developed a flow chart demonstrating the different ways in which people can raise concerns about an individual, depending on the urgency and immediacy of the concern and whether the individual is a student, member of staff or other. This information was communicated widely through briefings and staff training. Further guidance was also developed for more senior staff with responsibility for making decisions on how to deal with a concern once raised.

Case study: Metanoia Institute

66. The provider submitted a safeguarding policy which included clear principles and objectives for the handling and sharing of information internally and externally. The policy sets out an escalation route for any concerns identified. Initially staff or students raise any concerns with a designated support officer, who reviews the information provided and makes an initial decision on what further action is needed. This might include drawing on a wider range of input from across the organisation, including from its equality and diversity committee where appropriate, and making referrals externally to Prevent partners.

Case study: De Montfort University

67. The university has embedded the process for Prevent-related concerns in its well established student welfare processes, with serious concerns being escalated to a central welfare committee. This committee's role is widely understood throughout the university and encompasses representation from across the organisation. The committee is intrinsically linked with internal processes such as the raising of welfare concerns and assessment of risk to both individuals and the wider university community. In addition the committee is already the source of advice and support from, and where appropriate referrals to, external organisations.

68. Where providers were not meeting these requirements the most common issues were:

- slow progress in developing and implementing policies

⁷ Channel is a voluntary, confidential programme which offers tailored support for any individual identified as being vulnerable to being drawn into terrorism. Support provided may include life skills, careers or educational support, mental health support, or theological mentoring.

- not setting out a clear enough escalation process for sharing and assessing concerns
- not demonstrating a suitable process for making external referrals to access further support
- in a small number of cases, inappropriate processes which we felt would be unlikely to enable concerns to be dealt with effectively.

69. Some providers expressed concerns about a lack of clarity in the process for making external referrals and information-sharing arrangements. We will publish further guidance on this shortly.

70. All providers also demonstrated that they had a wide range of pastoral support available, including formal chaplaincy where appropriate. Some institutions, particularly smaller providers, did not have formal religious pastoral support but demonstrated a range of alternatives including counselling, student support and personal tutor networks. Although the guidance only suggests providers should have 'sufficient' provision, we identified that stronger returns outlined clear processes for the recruitment and oversight of chaplains.

Case study: University of Gloucestershire

71. This institution operates a multi-faith chaplaincy service. The Chaplaincy and Faiths Team is employed directly by the university as part of the Student Services Department, and has responsibility for managing dedicated faith spaces on each of the university's three campuses for social learning activities, worship, prayer and reflection. They have guidelines in place (and on display) advising students and staff about the appropriate use of their faith spaces, and how they are managed.

72. The service consists of a senior chaplain, who manages the team, which comprises two campus chaplains (each of whom acts as the lead chaplaincy representative on their designated site, and oversees the day-to-day operations of the faith space on their own campus, as well as playing a key role within the pastoral care structures for the students on site) and a Muslim chaplain, as well as a number of associate chaplains (who are volunteers supporting the faith needs of students across a wide set of faith groups).

73. Their training has been devised by the Prevent Lead, and for a number of years has incorporated the national training resource 'Operation Hindsight', a discussion exercise developed by the Association of Chief Police Officers' Prevent Delivery Unit which aims to help identify early intervention opportunities to safeguard individuals who may be vulnerable to all forms of extremism.

74. Finally, the statutory guidance states that providers should have 'clear and widely available policies for the use of prayer rooms and other faith-related facilities'. While providers overwhelmingly had arrangements in place to manage these facilities, we felt these did not always meet the requirement to be 'clear and widely available' – in **16 per cent** of cases we felt further work was needed. These providers will have to demonstrate that they have addressed this in their first annual reports. In most cases these issues were relatively minor and so did not result in a conclusion that a provider's policies 'needed improvement' overall.

IT policies

75. IT was the area where we felt most further work was still needed to address the requirements of the duty. Providers were expected to update IT policies to **make clear what is and is not acceptable** in relation to the duty; **consider the use of filters** as part of their overall approach; and put in place policies to manage access to security-sensitive materials for academic purposes, to enable unacceptable usage to be dealt with. Most providers had long-standing and well established usage policies and arrangements for security-sensitive access in place, but many were still reviewing these policies in the light of the statutory duty. Many other providers were still considering their approach to filtering and had yet to make a final decision on how to proceed. In total, around a third still needed to provide us with further evidence to demonstrate that they had fully addressed requirements around IT. We have asked providers to submit further information through the annual reporting process to demonstrate how they have addressed these points. In most cases these issues were relatively minor and so did not result in a conclusion that a provider's policies 'needed improvement' overall.

Case study: University of Sunderland

76. The provider demonstrated clearly that it had considered the interactions between policies relating to IT usage and the need in some cases for access to security-sensitive materials for research or teaching purposes, in the light of its responsibilities to consider academic freedom. The provider had updated acceptable usage policies to reference the Counter Terrorism and Security Act 2015 explicitly, and to define clearly what is allowed in relation to its systems, branded websites, and social media accounts, and the consequences of misuse. Alongside this, the provider decided to introduce filters to restrict access to certain categories of materials, including any identified as related to terrorism or extremism.

77. Having put filters in place, the institution reviewed its process for authorising legitimate access to sensitive materials to ensure that exceptions could be made where needed. All such requests are logged and recorded, along with any identified breaches. The institution issued communications to all staff and students explaining their obligations in relation to accessing extremist materials. It also identified key staff who needed training to support their role in delivering the new policy.

Students, students' unions and societies

78. Students' unions and related societies are mostly independent organisations and are not covered directly by the Prevent duty. As a result, they were not subject to our monitoring processes (although many are charities and so subject to oversight by the Charity Commission whose rules incorporate similar requirements around terrorism). The guidance does, however, suggest that: providers should consult with students when implementing the duty; they should set clear expectations for students' unions; and institutional speakers policies should cover events organised by students or societies, even where students' unions have their own separate policies. Some providers covered by the duty do not have formal students' unions or societies, so did not have to respond to these requirements, although we still expected to see evidence that students had been consulted.

79. Overall we found evidence of **strong collaboration between students' unions and providers** on implementing the duty, with **96 per cent of providers** demonstrating evidence of consultation with students or student representatives. Most institutions included students' union

representatives in Prevent working groups to ensure that they were involved continually in the development of policies. Some providers undertook wider consultation, such as online processes or open events. We also found that the vast majority of providers had clearly set out their expectations on students' unions and shown how institutional policies would apply to students. In four cases we felt further clarification was needed on how external speakers and events policies applied to events held by students' unions.

Case study: University of Leeds

80. The university consulted formally with students by including representatives from the students' union on the institution's Prevent Consultation Group which had responsibility for helping to shape how it would implement the statutory duty. Separately the University Secretary (the institution's Prevent lead) was also interviewed by the student newspaper, and the Vice-Chancellor has discussed how the institution has approached the duty during question-and-answer sessions with students.

Case study: University of the West of England

81. To ensure that students had the opportunity to give input on the university's implementation of the Prevent duty, the university and students' union jointly hosted a thorough consultation process. This included an open debate with presentations from internal Prevent leads and key external partners, and then an online feedback process which allowed all students to view and comment on draft Prevent policies and proposed revisions to existing procedures. Students were encouraged to participate through a communications campaign. The university considered the outcomes carefully and revised elements of its approach in response to student feedback.

Section 3: Supporting 'what works'

82. As part of HEFCE's role as monitor for Prevent, we are keen to ensure that alongside the formal processes to monitor providers' ongoing due regard to the Prevent duty, we also act to promote an environment of continuous improvement and to support the development and sharing of 'what works' in the higher education sector.

83. In the first year of our role as monitor, a range of activity has already been undertaken with the aim of supporting providers to meet the duty. This includes:

- a. Working with a range of stakeholders, including Universities UK, the Committee of University Chairs, the Association of Heads of University Administration, the Equality Challenge Unit and Independent HE to provide workshops and events for senior managers in providers on Prevent.
- b. Funding the Leadership Foundation for Higher Education (LFHE) to develop a suite of online training materials for staff in providers in relation to Prevent. We are also funding LFHE to review and evaluate the use and effectiveness of these materials and to make any changes required.
- c. Providing an updated advice note on the HEFCE website, setting out advice and examples of good practice for providers to consider in their approaches to meeting each area of the Prevent duty.

- d. Working with Universities UK to develop the Safe Campus Communities website, including the hosting of the online training materials (as referred to in b.).
- e. Funding LFHE to undertake some targeted training with governing bodies, proprietors or the equivalent, to help them understand better their role in relation to the duty.

84. We are also keen to support providers in areas of practice that either they or the Government have identified as needing further attention. From spring 2017, HEFCE will carry out a series of 'deep dives' into particular areas of practice pertaining to the duty, culminating in publications setting out examples of approaches that have worked for different institutions in different contexts.

85. From the initial phase of monitoring and consultation with sector representatives, we have identified the following areas for the first set of 'deep dives':

- a. Approaches to managing IT access, including acceptable usage policies, filtering and managing legitimate academic access to security sensitive materials.
- b. Approaches to safeguarding and welfare in relation to Prevent, including:
 - i. Engaging with staff and students in incorporating the Prevent duty into welfare and safeguarding policies, including working with academics and students' unions.
 - ii. Working with Prevent partners, including the police and local authorities (including best practice in sharing information about individuals and involvement in Channel panels).
- c. Exploring how approaches to equality and diversity can be embedded in approaches to Prevent.

86. Our approach to undertaking the 'deep dives' in 2017 will involve:

- a. Identifying examples of practice that have worked well through the information submitted to us by providers in annual reports.
- b. Undertaking further discussions with particular providers about examples of good practice to examine in more detail 'what works' in different contexts.
- c. Delivering a series of workshops in March and April 2017 which will explore these areas of practice, giving providers the opportunity to share practice and to discuss with their peers and external partners approaches that have been successful in different settings.
- d. Publishing a series of short 'what works' reports on the basis of our analysis, discussion with providers and key partners, and outputs from the workshops. These publications will include case studies of practice across a range of providers.

87. Our intention is then to undertake a similar programme of work on different themes in 2018, if this is deemed helpful to providers and other key partners. Additionally, we will undertake further Prevent-related projects, as needed, to ensure we can respond to developments during 2017.

Annex A: List of providers monitored by HEFCE

Below is a full list of the higher education providers HEFCE monitors in relation to implementation of the Prevent Duty. In each case we have used the provider's legal name. Providers may operate under different names, which are listed on the HEFCE Register of Higher Education Providers at www.hefce.ac.uk/reg/register/.

ABI College Ltd
Access to Music Ltd
All Nations Christian College Ltd
ALRA
Anglia Ruskin University
Architectural Association (Inc.)
Arden University Ltd
Arts Educational Schools
Arts University Bournemouth, the
Assemblies of God Inc.
Aston University
Bath Spa University
BCPC
BIMM Ltd
Birkbeck College
Birmingham City University
Bishop Grosseteste University
BPP University Limited
BPP Professional Education Limited
Bournemouth University
Bristol Baptist College
Brit College Ltd
British School of Osteopathy (the)
British Study Centres Ltd
Brunel University London
Buckinghamshire New University
Cambridge Arts & Sciences Ltd
Canterbury Christ Church University
CEG UFP Limited
Centre for Advanced Studies Ltd
Christ the Redeemer College
Christie's Education Ltd
City and Guilds of London Art School Ltd
City, University of London
Cliff College
CNELM
Court Theatre Training Company Ltd
Courtauld Institute of Art

Coventry University
Cranfield University
CWR
De Montfort University
East End Computing & Business College Ltd
Edge Hill University
Elim Foursquare Gospel Alliance
Empire London College Ltd
ESCP Europe-business school
EThames Graduate School Ltd
Fairfield School of Business Ltd
Falmouth University
ForMission Ltd
Futureworks Training Ltd
Goldsmiths' College
Grafton College Ltd
GSM London Ltd
Guildhall School of Music & Drama
Harper Adams University
Heythrop College
HULT International Business School Ltd
Hy Education Ltd
ICMP Management Ltd
ICON College of Technology and Management Ltd
Imperial College of Science, Technology and Medicine
Institute of Cancer Research, the
Inter-ed UK Ltd
International College of Oriental Medicine (UK) Limited, the
Irshad Trust
Istituto Marangoni Limited
Kaplan Financial Limited
Kaplan Open Learning (Essex) Ltd
Kensington Education Foundation Ltd
King's College London
Kingston University
KLC Ltd
Kogan Academy of Dramatic Arts
LCCM Ltd
Leeds Beckett University
Leeds College of Art
Leeds Trinity University
Liverpool Hope University
Liverpool John Moores University
Liverpool School of Tropical Medicine
London Bridge Business Academy Ltd
London Business School

London Churchill College Ltd
London International Film School Limited, the
London Metropolitan University
London School of Academics Ltd
London School of Business & Finance (UK) Ltd
London School of Business and Management Ltd
London School of Commerce & IT Ltd
London School of Hygiene and Tropical Medicine
London School of Management Education Ltd
London School of Science & Technology Ltd
London School of Theology
London South Bank University
London Studio Centre Ltd
Loughborough University
Luther King House Educational Trust
Manchester International Christian College
Manchester Metropolitan University
Matrix College of Counselling and Psychotherapy Ltd
Met Film School Ltd
Middlesex University
Mont Rose College of Management and Sciences Ltd
Moorlands College
Mountview Academy of Theatre Arts Ltd
National Film and Television School (the)
Nazarene Theological College
Nelson College London Ltd
Newman University
Norland College Ltd
Northern College of Acupuncture
Norwich University of the Arts
Nottingham Trent University
Nova College of Accounting and Business Ltd
OLC (Europe) Ltd
Open College of the Arts
Oxford Brookes University
Oxford Business College UK Ltd
Pearson College Ltd
Plymouth College of Art
Point Blank Ltd
Queen Mary University of London
Ravensbourne
Regent's University London
Richmond, The American International University in London Inc.
Roehampton University
Rose Bruford College of Theatre and Performance Ltd.
Royal Academy of Dance

Royal Holloway and Bedford New College
Royal Northern College of Music
RTC Education Ltd
SAE Education Ltd
Sheffield Hallam University
Sherwood Counselling & Psychotherapy Ltd
Slough Borough Council
Southampton Solent University
Spurgeon's College
St Mary's University, Twickenham
St Mellitus College Trust
St Piran's School (GB) Limited
St George's Hospital Medical School
St. John's College Nottingham Ltd
St. Nicholas Montessori Training Ltd
St. Patrick's International College Ltd
Staffordshire University
Stratford College London Ltd
Teesside University
Terapia
Tertiary Education Services Ltd
The Ashridge (Bonar Law Memorial) Trust
The Academy of Contemporary Music Ltd
The Cambridge Theological Federation
The Chicken Shed Theatre Trust
The College of Integrated Chinese Medicine
The Conservatoire for Dance and Drama
The Edward James Foundation Ltd
The Kingham Hill Trust
The Liverpool Institute for Performing Arts
The London Institute of Banking Finance
The London School of Economics and Political Science
The Markfield Institute of Higher Education
The Metanoia Institute
The Minster Centre
The Open University
The Queen's Foundation for Ecumenical Theological Education
The Royal Academy of Music
The Royal Agricultural University
The Royal Central School of Speech and Drama
The Royal College of Art
The Royal College of Music
The Royal Veterinary College
The Salvation Army
The School of Oriental and African Studies
The University of Bath

The University of Birmingham
The University of Bolton
The University of Bradford
The University of Buckingham
The University of Chichester
The University of Cumbria
The University of East Anglia
The University of Essex
The University of Huddersfield
The University of Hull
The University of Kent
The University of Lancaster
The University of Law Ltd
The University of Leeds
The University of Leicester
The University of Liverpool
The University of Manchester
The University of Reading
The University of Sheffield
The University of Surrey
The University of Warwick
The University of West London
The University of Wolverhampton
Tottenham Hotspur Foundation
Trinity College (Bristol) Ltd
Trinity Laban Conservatoire of Music and Dance
UCK Ltd
UK College of Business and Computing Ltd
University College Birmingham
University College London
University College of Estate Management
University for the Creative Arts
University of Bedfordshire
University of Brighton
University of Bristol
University of Cambridge
 Christ's College Cambridge
 Churchill College in the University of Cambridge
 Clare College Cambridge
 Corpus Christi College Cambridge
 Downing College Cambridge
 Emmanuel College Cambridge
 Girton College Cambridge
 Gonville and Caius College Cambridge
 Jesus College Cambridge
 King's College Cambridge

Master, Fellows and Scholars of Fitzwilliam College in the University of Cambridge (The)
Newnham College Cambridge
Pembroke College Cambridge
Peterhouse College Cambridge
Queens' College Cambridge
Selwyn College Cambridge
Sidney Sussex College Cambridge
St Catherine's College Cambridge
St John's College Cambridge
The College of St Mary Magdalene in the University of Cambridge
The Master and Fellows of Darwin College in the University of Cambridge
The Master, Fellows and Scholars of St. Edmund's College in the University of Cambridge
The President and Fellows of Clare Hall in the University of Cambridge
The President and Fellows of Hughes Hall in the University of Cambridge
The President and Fellows of Lucy Cavendish College in the University of Cambridge
The President and Fellows of Murray Edwards College, Founded as New Hall, in the
University of Cambridge
The President and Fellows of Wolfson College in the University of Cambridge
The Principal, Fellows and Scholars of Homerton College in the University of Cambridge
The Warden and Fellows of Robinson College in the University of Cambridge
Trinity College Cambridge
Trinity Hall Cambridge
University of Central Lancashire
University of Chester
University of Derby
University of Durham
 St Chad's College Durham
 St John's College Durham
University of East London
University of Exeter
University of Gloucestershire
University of Greenwich
University of Hertfordshire
University of Keele
University of Lincoln
University of London
University of Newcastle upon Tyne
University of Northampton, the.
University of Northumbria at Newcastle
University of Nottingham
University of Oxford
 All Souls College
 Balliol College
 Campion Hall College
 Christ Church College
 Corpus Christi College

Exeter College
Green Templeton College
Hertford College
Jesus College
Keble College
Lady Margaret Hall
Lincoln College
Magdalen College
Merton College
New College
Oriental College
Pembroke College
Principal and Fellows of St Hilda's College in the University of Oxford
Principal and Fellows of St Hugh's College in the University of Oxford
Queen's College
Regent's Park College
Somerville College
St Anne's College
St Catherine's College
St Edmund Hall
St John's College
St Peter's Hall College
The College of the Holy and Undivided Trinity in the University of Oxford of the Foundation
of Sir Thomas Pope trading as Trinity College
The English Province of the Order of Preachers t/a Blackfriars
The King's Hall and College of Brasenose in Oxford t/a Brasenose College
The Master and Fellows of the College of the Great Hall of the University Commonly
Called University College in the University of Oxford t/a University College
The Principal and Fellows of Linacre College in the University of Oxford t/a Linacre College
The Principal and Fellows of Mansfield College in the University of Oxford t/a Mansfield
College
The Principal and Fellows of the Manchester Academy and Harris College in the University
of Oxford t/a Manchester Harris College
The Society of St Stephen's House
The St Benet's Trust
Wadham College
Warden and Fellows of Nuffield College in the University of Oxford t/a Nuffield College
Warden and Fellows of St Antony's College in the University of Oxford t/a St Antony's
College
Wolfson College
Worcester College
Wycliffe Hall
University of Plymouth
University of Portsmouth
University of Salford, the.
University of Southampton

University of St Mark & St John
University of Suffolk
University of Sunderland
University of Sussex
University of the Arts, London
University of the West of England, Bristol
University of Westminster
University of Winchester
University of Worcester
University of York
West London College of Business & Management Sciences Ltd
Writtle University College
York St John University

Annex B: Self-assessment outcomes

1. As the first part of HEFCE's monitoring work, providers were required to submit a self-assessment in January 2016, setting out their readiness against a range of factors from the statutory guidance. These self-assessments showed only institutions' own initial views of their readiness; HEFCE did no external validation of these submissions. As such, this did not form part of our formal monitoring work but did enable us to target additional support and provide further guidance before the submission of detailed evidence from April 2016.
2. We have included a summary of institutions responses to the self-assessment exercise below as an indication of the progress made between January and April 2016.
3. Self-assessments were received from **314** of the total 321 'relevant higher education bodies' which are subject to the duty. The remaining seven were not required to submit a self-assessment as it was confirmed later that they were subject to the duty.
4. Each provider gave a readiness score on a five-point scale against different factors from the guidance. Using an aggregate score from these responses we calculated an indicator of overall preparedness. Using this indicator the results were:
 - a. **52 per cent of providers** felt they had a high or very high level of preparedness.
 - b. A further **23 per cent** identified themselves as having a limited or low level of preparedness.
 - c. The remaining **25 per cent** felt they were broadly prepared but with some areas of work still to undertake.

Annex C: Voluntary data returns

Background

1. As part of the evidence submitted between April and August 2016, higher education providers were asked on a voluntary basis to submit sets of data in relation to the duty. This data is intended to demonstrate how the sector is actively implementing its Prevent responsibilities and to help us better understand how institutional policies are working in practice.
2. **Around 80 per cent of providers submitted voluntary data.** The group of providers that did not submit data included several large city-based universities, which had an impact on the overall results and meant that these results are incomplete. This data covers a relatively short period between 18 September 2015 (when the duty came into force) and 29 February 2016.
3. Providers submitted data on several areas:
 - a. **Prevent referrals:**
 - i. The number of people where there were concerns about being drawn into terrorism.
 - ii. The number of people referred to Prevent.
 - iii. The number of people receiving support through the Channel programme.
 - b. **Events and speakers:**
 - iv. The number of events and speakers referred to the highest levels of approval required by the institution's procedures.
 - c. **Staff training:**
 - v. The number of staff who received Prevent-related training, with an indication of the nature of the training, including where different categories of staff received different types of training.
4. One of these datasets – the number of people receiving support through the Channel programme – was not sufficiently robust as providers did not routinely hold this information. As a result we have not included this in the summary.

Summary of voluntary data returns

5. The data returns revealed the following facts:
 - a. **Prevent referrals:** Providers reported that there were concerns about **39 individuals**; of these, **14 were referred** to Prevent.
 - b. **Events and speakers:** Providers reported that **211 events** and **345 speaker requests** had been escalated to the highest levels of approval within the institution. Across 321 institutions this represents a very small proportion of the overall number of events hosted, but demonstrates that active processes are in place for identifying and managing events appropriately which might represent a higher risk. We did not ask providers for information on the mitigations which were put in place where events were identified as 'high risk' or whether any events were cancelled. However, through our broader monitoring

work we are not aware of any examples of events being cancelled as a result of Prevent considerations.

c. **Staff training:** Providers reported that **10,309 members of staff** had received Prevent-related training during this period.

Next steps

6. Between December 2016 and April 2017 all providers will need to submit an annual report demonstrating that they are continuing to engage with the duty and implementing their policies actively. As part of this, every provider will need to submit mandatory data covering the same three broad areas. However, the detailed requirements in relation to the Prevent referrals element of this have changed considerably as a result of the learning from the initial voluntary return. In particular, we have reshaped requirements to focus more on the elements of the process under institutions' control – such as the internal sharing of concerns and the process for deciding to make formal external referrals – rather than the eventual outcomes (such as the decision to put a package of multi-agency support in place). We have published more information about these revised data requirements in the 'Updated framework for the monitoring of the Prevent duty in higher education in England' (HEFCE 2016/24).