

Prevent Duty Annual Report 2016–17

Outcome requested	Audit and Risk Committee is asked to consider QMUL’s Prevent Duty Annual Report and make recommendations to Council on declarations to be included in the Annual Accountability Return.
Executive Summary	<p>[a] The Counter-Terrorism and Security Act 2015 requires universities to demonstrate ‘due regard to the need to prevent people from being drawn into terrorism’ (the ‘Prevent duty’) by:</p> <ul style="list-style-type: none"> • assessing the risks that people might be drawn into terrorism; • putting appropriate policies in place to respond to the requirements of the statutory guidance in the light of these risks; • ensuring that policies are properly followed and applied in practice. <p>[b] HEFCE has established a monitoring framework for the Prevent duty that requires QMUL to submit a brief written report, a data return and signed declarations from the Chair of Council as part of the Annual Accountability Return. The required wording of the declarations is as follows.</p> <p><i>Throughout the academic year and up to the date of approval, Queen Mary University of London:</i></p> <ul style="list-style-type: none"> • <i>has had due regard to the need to prevent people being drawn into terrorism (the Prevent Duty);</i> • <i>has provided to HEFCE all required information about its implementation of the Prevent duty;</i> • <i>has reported to HEFCE in a timely way all serious issues related to the Prevent duty.</i> <p>[c] Audit and Risk Committee is asked to consider QMUL’s Prevent Duty Annual Report. The CUC’s guidance on the responsibilities of governing bodies for counter-terrorism and the Prevent agenda is included with the additional reading.</p>
QMUL Strategy	The Prevent Duty potentially has impact on QMUL’s Strategic Aims 1, 2, 4 and 5.
Internal/External regulatory/statutory reference points:	<p>Counter-terrorism and Security Act 2015</p> <p>Prevent Duty Guidance for Higher Education Institutions in England and Wales (HM Government: September 2015)</p>

	<p>Framework for the Monitoring of the Prevent Duty in Higher Education in England (HEFCE: August 2017)</p> <p>Advice Note for Institutions on Monitoring Compliance with the Prevent Duty (HEFCE: August 2017)</p> <p>Illustrative Practice Note on the Prevent Strategy (CUC: November 2016)</p>
Strategic Risks:	<p>[9] Reputational development and external relations.</p> <p>[13] Maintain effective and constructive governance.</p> <p>[15] Security of people, assets and data in line with current legislation.</p>
Equality Impact Assessment:	Not required — QMUL’s policies and procedures have not changed significantly as a result of the Prevent Duty.
Subject to prior and onward consideration:	To be considered by Council on 30 November 2017.
Confidential paper under FOIA/DPA	No.
Timing	Under HEFCE’s monitoring framework, publicly-funded universities are required to submit their Prevent Duty Annual Reports on 1 December 2017.
Author	Jonathan Morgan, Academic Registrar and Council Secretary
Date	3 November 2017
Senior Management/External Sponsor:	Laura Gibbs, Chief Operating Officer

Prevent Duty Annual Report 2016–17

1. This report has been prepared to comply with HEFCE's Updated Framework for the Monitoring of the Prevent Duty in Higher Education in England (August 2017) and has regard to HEFCE's Updated Advice Note for Institutions (August 2017) and the CUC's Illustrative Practice Note on the Prevent Strategy (November 2016).
2. QMUL is required to report to HEFCE in a timely manner all serious Prevent-related incidents which have led us fundamentally to review or revise our broader Prevent policies, or which have caused reputational harm, or actual harm to students or members of staff. There have been no such incidents between 1 August 2016 and 31 July 2017.
3. QMUL is also required to notify HEFCE in a timely manner of any material changes which affect the way in which we are delivering our responsibilities under the Prevent Duty, including significant changes to policies or processes relating to the Prevent Duty as previously assessed by HEFCE, changes of responsibility for Prevent, and changes of control. There have been no such changes between 1 August 2016 and 31 July 2017.

Risk assessment and action plan

4. The Prevent duty risk register and action plan are fully embedded in QMUL's Strategic Risk Register and formal arrangements for monitoring institutional risks. The risks and action plan are reviewed at least annually by the QMUL Channel Panel and discussed with the Regional Prevent Co-ordinator.
5. Over the past year the QMUL Channel Panel has updated the risk register and action plan as follows:
 - [a] some of the initial risk scores have been reduced to reflect the fact that there is now greater institutional awareness of the Prevent duty and that there has been the opportunity to evaluate the arrangements for complying with it over time;
 - [b] a single, senior owner has been identified for each risk area;
 - [c] actions on reviewing communications with students and training have been completed.

Partnership and leadership

6. The QMUL Channel Panel meets as required to discuss issues relating to the welfare and safeguarding of individual students and members of staff. It also has an annual meeting to update the Prevent duty risk register and action plan, and to review how Prevent-related policies are working in practice. The membership includes representatives of the senior executive, directors of relevant professional services departments and the President of the Students' Union (QMSU). Examples of issues discussed over the past year include: a review of communications with students and members of staff on the implementation of the Prevent duty at QMUL; the stance of QMSU and local trades unions on the Prevent duty; updates from regional and national forums; a review of training for members of staff; and the work of the newly-created Faith and Spirituality Forum.

7. QMUL's Prevent duty lead keeps up to date with developments in the sector through membership of the London HE Prevent Forum and the Russell Group Prevent Forum, and meets at least biannually with the Regional Prevent Co-ordinator. Issues discussed with the Regional Prevent Co-ordinator over the past year include: training for members of staff; events on campus; advice on individual student matters; and proposed changes to how services external to QMUL are structured. A joint meeting was also held with sabbatical officers and the Regional Prevent Co-ordinator to discuss QMSU's stance on the Prevent duty.
8. The Council gains assurance that the Prevent duty is being actively implemented at QMUL through the consideration by Audit and Risk Committee of this report and an in-year oral update from the Prevent duty lead. There is also an agreed mechanism for reporting on serious Prevent-related incidents to the Committee.

Evidence of active and effective implementation of Prevent-related policies

9. QMUL has long-established policies and procedures for the approval of external speakers and events, and these are subject to regular review by Senate. The policies and procedures used by QMSU are aligned with those of the university, and there is close and effective liaison between the Students' Union and Security staff on the approval of external speakers. Individuals who have responsibility in this area, including those based in QMSU, receive regular training and have access to external networks and advice. The President and Principal reports formally to Council on the operation of QMUL's external speakers and events policies at every meeting.
10. Two events were escalated to the highest level of approval between 1 August 2016 and 31 July 2017.
 - [a] In one case, a student complained to the President and Principal about several speakers who had been invited to a student society event. The speakers had already been reviewed by Security staff as part of the approval process, which involved liaison with the police. We were not advised to cancel the event and a check of backgrounds and also events at other universities did not flag any evidence of illegality in terms of the written or spoken word. The event therefore proceeded as planned.
 - [b] In the other case, a complaint was received from a member of staff about a student society event which focussed on the 'boycott, divest and sanctions' movement against Israel. The event had been approved through the appropriate procedures on the condition that the Head of Security would attend the event to monitor the content of the presentations and discussion. We were therefore able to confirm that the discussion and exchanges at the event, although not sympathetic towards Israel, did not fall into the category of inciting hatred or otherwise contravening QMUL's policy of freedom of speech within the law. The President and Principal subsequently met with representatives of the student Jewish Society to discuss the event.
11. QMUL ensures the welfare of students through a long-established safeguarding policy and network, whereas staff welfare is the responsibility of line managers. Members of the university-wide safeguarding network are appropriately trained (seven received face-to-face refresher training in the last year) and meet on a regular basis to discuss the operation of the safeguarding policy and to learn from recent safeguarding cases. This year, 22 student support officers based in academic schools and institutes also received initial face-to-face training on recognising the factors that could lead to extremism and the relevant reporting mechanisms.

12. Between 1 August 2016 and 31 July 2017, we were contacted by the police on two occasions to discuss the welfare of individual students. In each case, this provided a useful opportunity to co-ordinate our safeguarding efforts and to share appropriate information, with the advice of the Regional Prevent Co-ordinator.
13. QMUL's policies on internet filtering and the acceptable use of IT were reviewed with the introduction of the Prevent duty, and the Chief Information Security Officer is a member of the QMUL Channel Panel in recognition of the importance given to this area. Student-led social media channels have become a growing area of concern with regard to student welfare. QMUL and QMSU are therefore working closely together to monitor and respond to inappropriate use of social media, and issues are dealt with through disciplinary processes where appropriate. QMUL also offers social media training to groups of student society leaders each year. This work is aligned with other strategic initiatives that are underway to challenge hate crime and gender-based violence.
14. The Faith and Spirituality Forum was established a year ago and now meets quarterly to discuss matters such as the use of faith spaces on campus, student and staff data on the representation of different faiths, and interactions with local faith networks. The Church of England provides a resident chaplain at QMUL who is a member of the Faith and Spirituality Forum and oversees one of the multi-faith spaces on campus. Options for providing leadership across a greater range of faiths are currently under consideration. QMSU is closely involved in discussions around faith and has introduced a number of initiatives to promote tolerance and dignity. Through effective collaboration with QMSU, we have been able to increase the availability of space on campus to accommodate Friday prayers and have issued new guidance for students on religious observance and their academic work.

Staff training

15. Guidance on the Prevent duty, including a description of factors that could suggest that an individual might be at risk of being drawn into terrorism, and arrangements for reporting any concerns within QMUL, is provided on the QMUL intranet. Following a review over the past year of other training options, including materials provided by the Leadership Foundation for Higher Education, we have procured (from Cylex) an online course that will also be made available in the coming months on an optional basis to all students and members of staff through the QMUL virtual learning environment.
16. We maintain a list of staff roles for which enhanced training (such as WRAP training) is required. This includes individuals with significant responsibilities in safeguarding and student welfare, physical and information security, events management and student residences, as well as members of the QMUL Channel Panel. Managers in these areas are responsible for ensuring that initial and refresher training is undertaken, and for reporting on this to the Prevent lead. Information about training undertaken and its impact on the successful operation of welfare and events management policies is provided elsewhere in this report. We are currently in discussion with the Regional Prevent Co-ordinator to schedule face-to-face WRAP training on campus now that there is sufficient capacity to provide this.

Student engagement

17. QMSU's stance on the Prevent strategy has not diminished in any way its close engagement with QMUL on the development and implementation of relevant policies, in particular where these relate to student welfare and events management. Examples are provided throughout this report of effective engagement between QMUL and QMSU, and effective alignment and implementation of relevant policies. We are refreshing our communications with students on Prevent over the coming year as part of a broader

campaign, aligned with QMUL's values, dealing with dignity and tolerance. The new online course will be made available to coincide with this.

Jonathan Morgan
Academic Registrar and Council Secretary
3 November 2017

Prevent Risk Register

Ref	Risk Group	Risk Descriptor	Imp.	Like.	Initial Risk Score	Dir.	Controls	Imp.	Like.	Residual Risk Score	Dir.	Further Actions and Notes	Owner	Lead Officer	Strategy Objective	Term
Public Engagement and Reputation																
9.01	Reputational Development and External Relations	<ul style="list-style-type: none"> QMUL's statutory duty to foster freedom of speech within the law may be misinterpreted externally as a failure to comply with the Prevent duty. 	4.0	4.0	16.0	↔	<ul style="list-style-type: none"> QMUL Press Office releases briefings on QMUL's Freedom of Speech Policy and procedures for approving external speakers and events (A) QMUL Press Office offers support to students and members of staff who attract attention from the press (A) QMUL Press Office offers press training in groups to leaders of all clubs and societies (A) The President and Principal may respond to concerns directly, setting out how QMUL balances its various duties. (A) 	4.0	3.0	12.0	↔	Unassigned	Director of Marketing and Communications	Director of Marketing and Communications	2.1, 5.1	Long
9.02	Reputational Development and External Relations	<ul style="list-style-type: none"> A student or member of staff may attract negative press scrutiny in the context of the Prevent Strategy. 	4.0	2.0	8.0	↔	<ul style="list-style-type: none"> QMUL Press Office releases briefings on QMUL's Freedom of Speech Policy and procedures for approving external speakers and events (A) QMUL Press Office offers support to students and members of staff who attract attention from the press (A) Members of the Queen Mary Senior Executive maintain regular dialogue with the Queen Mary Students' Union on its current campaigns. (A) 	4.0	1.0	4.0	↔	<ul style="list-style-type: none"> Unassigned The Queen Mary Students' Union is committed to campaigning against the Prevent Strategy during 2017-18. 	Director of Marketing and Communications	Director of Marketing and Communications	1.2, 1.3	Long

Governance, Business Continuity and Data Security

Ref	Risk Group	Risk Descriptor	Imp.	Like.	Initial Risk Score	Dir.	Controls	Imp.	Like.	Residual Risk Score	Dir.	Further Actions and Notes	Owner	Lead Officer	Strategy Objective	Term
15.01	Security of people, assets and data appropriate contingency arrangements for facilities and functions	<ul style="list-style-type: none"> Senior management does not continue to provide effective oversight of the Prevent duty. 	4.0	2.0	8.0	↔	<ul style="list-style-type: none"> The Academic Registrar and Council Secretary is QMUL's Prevent duty lead (A) The Director of Student Services is QMUL's Lead Safeguarding Officer (A) The membership of the QMUL Channel Panel includes two members of Queen Mary Senior Executive and four directors (A) Queen Mary Senior Executive receives regular briefings and updates on the Prevent duty and has met with the Regional Prevent Co-ordinator (A) QMUL has effective relationships with local police and Regional Prevent Co-ordinators and a forum has been identified through which these institutional relationships are maintained and reported to the QMUL Channel Panel (A) QMUL is actively engaged with sector-wide networks regarding the Prevent duty and for sharing information about external speakers (A) The Prevent duty is included on the strategic risk and legal compliance registers (A) The Principal's Office is part of the formal escalation process for the approval of external speakers and events (A) The Strategic Risk Management Group reviews the strategic risk register quarterly (A) 	4.0	1.0	4.0	↔	Unassigned	<ul style="list-style-type: none"> Academic Registrar and Council Secretary 	<ul style="list-style-type: none"> Academic Registrar and Council Secretary 	1.2	Long
15.02	Security of people, assets and data appropriate contingency arrangements for facilities and functions	<ul style="list-style-type: none"> Council does not continue to gain appropriate assurance about compliance with the Prevent duty 	4.0	2.0	8.0	↔	<ul style="list-style-type: none"> Audit and Risk Committee and Council receive regular briefings and updates on the Prevent duty (A) The Chair of Audit and Risk Committee has attended training on the Prevent duty offered by the Leadership Foundation for HE (A) The Prevent duty is included on the strategic risk and legal compliance registers. Audit and Risk Committee reviews the strategic risk register quarterly and the legal compliance register annually (A) The President and Principal reports to Council routinely on contentious events. (A) 	4.0	1.0	4.0	↔	Unassigned	<ul style="list-style-type: none"> President and Principal 	<ul style="list-style-type: none"> Academic Registrar and Council Secretary 	1.2	Long

Ref	Risk Group	Risk Descriptor	Imp.	Like.	Initial Risk Score	Dir.	Controls	Imp.	Like.	Residual Risk Score	Dir.	Further Actions and Notes	Owner	Lead Officer	Strategy Objective	Term
15.03	Security of people, assets and data appropriate contingency arrangements for facilities and functions	<ul style="list-style-type: none"> Students and members of staff are disengaged and unaware how to share information about vulnerable individuals. 	3.0	3.0	9.0	↔	<ul style="list-style-type: none"> The President of Queen Mary Students' Union is a member of the QMUL Channel Panel and has confirmed that this will continue while the Union campaigns against the Prevent Strategy (A) An internal communications strategy on the Prevent duty and local safeguarding arrangements has been implemented covering all students and members of staff and was reviewed in 2017 (A) Student and staff representatives have been consulted on the Prevent duty risk assessment and action plan (A) 	3.0	2.0	6.0	↔	Unassigned	<ul style="list-style-type: none"> Academic Registrar and Council Secretary 	<ul style="list-style-type: none"> Academic Registrar and Council Secretary Director of Student Services Director of Marketing and Communications 	1.2	Long
15.04	Security of people, assets and data appropriate contingency arrangements for facilities and functions	<ul style="list-style-type: none"> Relevant members of staff do not understand how to recognise vulnerable individuals or what action to take in response. 	3.0	3.0	9.0	↔	<ul style="list-style-type: none"> The rationale for identifying members of staff to complete WRAP training has been discussed with the Regional Prevent Co-ordinator and approved by Queen Mary Senior Executive. Schools, institutes and departments may nominate additional members of staff to undertake WRAP training where appropriate. (A) The QMUL Channel Panel monitors the provision and uptake of training for individuals in designated roles (A) Written briefings on Prevent and local safeguarding arrangements are posted on a dedicated area of the intranet. (A) An online course will be made available to all students and staff during 2017-18. (B) 	2.0	2.0	4.0	↔	Unassigned	<ul style="list-style-type: none"> Academic Registrar and Council Secretary 	<ul style="list-style-type: none"> Academic Registrar and Council Secretary Director of Student Services 	1.2	Long

Ref	Risk Group	Risk Descriptor	Imp.	Like.	Initial Risk Score	Dir.	Controls	Imp.	Like.	Residual Risk Score	Dir.	Further Actions and Notes	Owner	Lead Officer	Strategy Objective	Term
15.05	Security of people, assets and data appropriate contingency arrangements for facilities and functions	<ul style="list-style-type: none"> Procedures for sharing information internally and externally on vulnerable individuals are not maintained effectively. 	3.0	1.0	3.0	↔	<ul style="list-style-type: none"> Written briefings on Prevent and local safeguarding arrangements are posted on a dedicated area of the intranet. (A) There is a formal link between the QMUL safeguarding network and the QMUL Channel Panel (A) QMUL has effective relationships with local police and Prevent Co-ordinators and a forum has been identified through which these institutional relationships will be maintained (A) The Safeguarding Policy and Procedure and the role descriptions of members of the safeguarding network have been revised to include explicit reference to sharing information about vulnerable individuals under the Prevent duty (A) QMUL's whistleblowing policy was reviewed in reference to the Prevent duty in November 2015 (A) The Regional Prevent Co-ordinator periodically attends meetings of the QMUL Channel Panel (A) QMUL Channel Panel considers responsibilities under the Data Protection Act before sharing information externally. (A) 	2.0	1.0	2.0	↔	Unassigned	<ul style="list-style-type: none"> Academic Registrar and Council Secretary 	<ul style="list-style-type: none"> Academic Registrar and Council Secretary Director of Student Services Assistant Director of Estates and Facilities (Residences and Events) 	1.2	Long
15.06	Security of people, assets and data appropriate contingency arrangements for facilities and functions	<ul style="list-style-type: none"> There may be insufficient chaplaincy and pastoral support available for all students. 	1.0	2.0	2.0	↔	<ul style="list-style-type: none"> The policies for faith support were reviewed in reference to the Prevent duty in December 2015 (A) There is a multi-faith facility on the Mile End campus (A) The Faith and Spirituality Forum, with student and staff representatives, discusses a broad range of faith issues, including the management of central faith facilities on campus and any issues arising from their use. (A) 	1.0	1.0	1.0	↔	<ul style="list-style-type: none"> Unassigned The Church of England provides a resident chaplain at QMUL. Support for other faiths is provided through local communities. 	<ul style="list-style-type: none"> Director of Student Services 	<ul style="list-style-type: none"> Director of Student Services 	1.2	Long
15.07	Security of people, assets and data appropriate contingency arrangements for facilities and functions	<ul style="list-style-type: none"> Faith facilities may be used inappropriately if there is insufficient oversight. 	3.0	1.0	3.0	↔	<ul style="list-style-type: none"> The protocol on use of the multi-faith facility was reviewed in December 2015 (A) The Faith and Spirituality Forum, with student and staff representatives, discusses a broad range of faith issues, including the management of central faith facilities on campus and any issues arising from their use. (A) 	3.0	1.0	3.0	↔	<ul style="list-style-type: none"> Unassigned Students wishing to use the multi-faith facility must visit the Mile End or Whitechapel campuses to do so. 	<ul style="list-style-type: none"> Director of Student Services 	<ul style="list-style-type: none"> Director of Student Services President of Queen Mary Students' Union 	1.2	Long

Ref	Risk Group	Risk Descriptor	Imp.	Like.	Initial Risk Score	Dir.	Controls	Imp.	Like.	Residual Risk Score	Dir.	Further Actions and Notes	Owner	Lead Officer	Strategy Objective	Term
15.08	Security of people, assets and data appropriate contingency arrangements for facilities and functions	<ul style="list-style-type: none"> Students may become radicalised through exposure to extremist views and ideologies on campus. 	4.0	1.0	4.0	↔	<ul style="list-style-type: none"> The relevant policies and procedures of both QMUL and Queen Mary Students' Union have been updated in reference to the Prevent duty and are aligned with each other. The policies apply to all students and members of staff. Policies and procedures are reviewed and updated where issues are identified. (A) Security staff have completed WRAP training (A) 	4.0	1.0	4.0	↔	<p><u>Unassigned</u></p> <ul style="list-style-type: none"> The updated approach has enhanced the already successful oversight of visits by external speakers and events on campus. 	President and Principal	<ul style="list-style-type: none"> Assistant Director of Estates and Facilities (Residences and Events) Executive Officer to the Principal President of Queen Mary Students' Union 	1.2	Long
15.09	Security of people, assets and data appropriate contingency arrangements for facilities and functions	<ul style="list-style-type: none"> QMUL may not continue to foster freedom of speech within the law. 	4.0	1.0	4.0	↔	<ul style="list-style-type: none"> The terms of reference of Senate give it responsibility to approve policies to support and foster academic freedom in relation to the academic activity of QMUL and to report to Council on matters of concern (A) Senate has debated the issue of freedom of speech and academic freedom in reference to the Prevent duty (A) QMUL's policies and procedures on research ethics have been expanded with further information about existing practices for approving security-sensitive and extremism-related research (A) The Freedom of Speech Policy has been reviewed in light of the Prevent duty. Although the substance of the policy remains unchanged, it has been expanded with further information about existing practices for mitigating risks. The revisions have been approved by Senate and will be reported to Council in April 2016 in the context of its monitoring role (A) 	2.0	1.0	2.0	↔	<p><u>Unassigned</u></p>	President and Principal	<ul style="list-style-type: none"> Assistant Director of Estates and Facilities (Residences and Events) Executive Officer to the Principal President of Queen Mary Students' Union Chair of Ethics of Research Board 	1.2, 5.1	Long
15.10	Security of people, assets and data appropriate contingency arrangements for facilities and functions	<ul style="list-style-type: none"> Students may become radicalised through exposure to extremist views and ideologies at QMUL branded events taking place off campus. 	4.0	1.0	4.0	↔	<ul style="list-style-type: none"> The relevant policies and procedures of both QMUL and Queen Mary Students' Union have been updated in reference to the Prevent duty and are aligned with each other. The policies apply to all students and members of staff (A) 	2.0	1.0	2.0	↔	<p><u>Unassigned</u></p> <ul style="list-style-type: none"> The updated approach has enhanced the already successful oversight of visits by external speakers and events on campus. 	President and Principal	<ul style="list-style-type: none"> Assistant Director of Estates and Facilities (Residences and Events) Executive Officer to the Principal President of Queen Mary Students' Union 	1.2	Long

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15.11	Security of people, assets and data appropriate contingency arrangements for facilities and functions	<ul style="list-style-type: none"> Students or members of staff may use QMUL's IT facilities to access or share harmful content. 	3.0	2.0	6.0	↔	<ul style="list-style-type: none"> QMUL's policies on the use of IT facilities have been revised to make explicit reference to the Prevent duty (A) QMUL's policies and procedures on research ethics have been expanded with further information about existing practices for approving security-sensitive and extremism-related research (A) Queen Mary Senior Executive confirmed QMUL's position on internet filtering in the light of guidance from JISC and developments across the HE sector in October 2016 (A) 	2.0	2.0	4.0	↔	Unassigned	<ul style="list-style-type: none"> Chief Information Officer 	<ul style="list-style-type: none"> Head of IT Security 	1.2, 1.3	Long

Illustrative Practice Note 2: Prevent Strategy

November 2016

Governing Body Responsibility for Counter-Terrorism and Prevent Agenda

What does the HE Code of Governance say?

1. The governing body protects institutional reputation by being assured that clear regulations, policies and procedures that adhere to legislative and regulatory requirements are in place, ethical in nature, and followed.
2. The governing body has a responsibility for all decisions that might have significant reputational or financial implications (including significant partnerships or collaborations). It must therefore seek assurance that the institution meets all legal and regulatory requirements imposed on it as a corporate body, including through instruments of governance such as statutes, ordinances and articles.
3. The governing body **must** understand and respect the principle of academic freedom – the ability within the law for academics to question and test received wisdom, and to put forward new ideas and controversial or unpopular opinions, without placing themselves in jeopardy of losing their jobs or privileges – and its responsibility to maintain and protect it as enshrined in freedom of speech legislation.
4. Alternative providers (APS) operate under a different legal framework in respect of freedom of information and protection of academic freedom. However, if they wish to comply with the Code of HE Governance, their corporate or parent bodies will need to put in place contractual arrangements which protect academic freedom.

Why is it important?

5. The Prevent Strategy, published by the government in 2011, is part of their overall counter-terrorism strategy. The 2011 Prevent Strategy has three specific strategic objectives:
 - Respond to the ideological challenge of terrorism and the threat from those who promote it
 - Prevent people from being drawn into terrorism and ensure they are given appropriate advice and support
 - Work with sectors and institutions where there are risks of radicalisation that we need to address
6. The Counter-Terrorism and Security Act (2015) places a statutory duty on a range of bodies (including Higher Education institutions) to have 'due regard to the need to prevent people from being drawn into terrorism' (the Prevent Duty). On 16 July 2015, the Home Office published updated guidance for Higher Education institutions (HEIs) in England and Wales; separate guidance has been published for institutions in Scotland in order to comply with the legislation. In England, Wales and Scotland the duty on HEIs came into effect on 18 September 2015. It should be noted that Part 5 of the Act, which lays out the Prevent Duty, does not apply to Northern Ireland.

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7. The [guidance](#) issued by the Home Office derives from section 29 of the Act, which stipulates that the specified authorities (which include HEIs) must have regard to this guidance when carrying out the Prevent Duty.
8. Although the 2015 Act and guidance places a renewed emphasis on the Prevent agenda, many HEIs across the United Kingdom will already have in place procedures for the assessment of risk for dealing with Prevent-related issues.
9. Many of these expectations connected to the Prevent Duty relate to the protection, care and safeguarding of students, for which universities have extensive and effective arrangements in place. However, given the requirements of the new legal duty and public sensitivities a key element of the sector's response to this agenda needs to be providing assurance that these arrangements are being applied and implemented consistently and include preventing vulnerable people from being drawn into terrorism.
10. In addition, institutions have to give careful consideration to their duty to preserve academic freedom and freedom of speech as set out in the 1986 Education (No 2) Act, as well as respecting and celebrating the diversity that exists within their communities and on their campuses.
11. The core implications for universities are set out in Annex 1.

FAQs

Is this an anti-Muslim agenda?

12. The Home Office states that the Prevent work is intended to deal with all kinds of terrorist threats to the UK, which they state are currently largely posed by terrorist organisations in Syria and Iraq, and al Qaida and associated groups. This also includes terrorists associated with the far right. As such, institutions should avoid a specific focus on any one particular group in their approach to Prevent.

Is this an additional burden on universities?

13. HEIs will also be familiar with other groups such as extremist animal rights activists who have previously targeted universities. The government guidance states, 'we do not envisage the new duty creating large new burdens on institutions and intend it to be implemented in a proportionate risk-based way.' Nevertheless, institutions do face burdens in terms of additional reporting requirements and they are investing a substantial amount of time and resource into reviewing current and developing new approaches and responses. The key for institutions is to judge for themselves the extent of any potential threat they face and ensure that their response is proportionate.

What do the funding councils expect of the governing body in this area?

14. In England, under section 32 of the Act, the Higher Education Funding Council for England (HEFCE) has been appointed to monitor the performance of relevant Higher Education bodies (RHEBs) in England¹ against the Prevent Duty. Section 32 also places a duty on RHEBs to provide information it requires in order to monitor institutions' performances in discharging their duty in having 'due regard to the need to prevent people from being drawn into terrorism.'

Bucks New University

Buckinghamshire New University has taken a proactive, anticipatory approach to the requirements placed on Higher Education under the Counter-Terrorism and Security Act 2015. It began the process in earnest in early 2015 and then briefed the Senior Team and Governing Council on the anticipated legal and governance requirements. It adapted legislative guidance into the body of its plan to explain the rationale and mapped Prevent guidance to the university structure to devise the action plan. This included interlinking with existing policies and procedures around guest speakers, freedom of speech, IT and systems security and student and employee safeguarding. As required by the Act it conducted a risk analysis against current assessed threats which is related directly to its context and profile as an HEI.

Its plan is now in place with actions underway and a key aspect of this is employee and student union assurance and communication to achieve best possible 'buy in'. It has been shared with over 70 UK HEIs and submitted to the Home Office by our local Prevent coordinator as an example of good practice. Throughout the process it has emphasised that it is important that the actions taken by the university are neither sensationalist nor excessive; and must be aligned with its organisational culture, context, priorities and the risk itself. It continues to be a work in progress.

¹ A full list of all relevant Higher Education bodies can be found at www.hefce.ac.uk/reg/prevent

15. The approach to monitoring compliance adopted by HEFCE is set out in a [revised monitoring framework](#) (September 2016). This supersedes original monitoring guidance published by HEFCE in November 2015. They include:

- an initial self-assessment of preparedness for Prevent duties which was due by 22 January 2016
- providing detailed information about policies, processes and arrangements (April to August 2016)
- an annual report on the active and ongoing implementation of the Prevent duty (with the first report due for most HEFCE-funded providers in December 2016; Alternative providers in February 2017)
- face-to-face Prevent reviews on a risk-based approach
- reports to HEFCE on all serious issues and material changes relating to the Prevent duty

16. The annual report will be required to include the following three declarations by the governing body:

‘Throughout the academic year and up to the date of approval, [organisation name]:

- has had due regard to the need to prevent people being drawn into terrorism (the Prevent Duty)
- has provided to HEFCE all required information about its implementation of the Prevent Duty
- has reported to HEFCE 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 submitted on a timely basis.’

17. HEFCE will also expect governing bodies to seek assurances that their provider has considered a refreshed Prevent risk assessment for the year ahead, and an updated action plan addressing any issues identified.

18. In Wales, HEFCW is named as a potential monitoring authority within the Act and it formally received confirmation of this duty in July 2016. HEFCW will issue its Monitoring Framework in the autumn, following a short consultation. The general thrust of HEFCW’s framework is expected to be broadly in line with HEFCE’s monitoring approach, but there is also likely to be variation in order to take the on-going work on Prevent in Wales into account.

19. Arrangements in Scotland are different. It is the responsibility of each HEI to determine what measures it will take to address this statutory duty. [A Good Practice Guide](#) has been prepared in order to assist the HEIs in deciding what measures are appropriate and, in doing so, to encourage the adoption of consistent good practice across the Scottish Higher Education sector, taking account of local needs and of institutional structures and culture.

Who is responsible for this agenda?

20. Ultimately responsibility for this agenda and compliance sits squarely with the governing body. In order to comply with the Prevent Duty, HEIs will discharge this by ensuring they have ‘properly thought through procedures and policies in place... which match the general expectations set out in the guidance.’

How can the governing body be expected to understand all of the complexities of the Prevent agenda and manage the risks involved?

University of Roehampton

The University of Roehampton has engaged with the Prevent agenda in a number of ways. It held debates at Senate and at a Council away day on controversial ‘hate’ speakers and related issues, including a wider debate on the limits of free speech. These discussions involved academic and administrative staff, the Students’ Union and governors. It also held focus groups of students, including with those of faith, to discuss how the university engages with their issues and concerns. It has regular contact with regional Prevent teams, including attendance by them at a Council away day. A Prevent working group, coordinated by a Pro Vice-Chancellor, is reviewing policies and procedures so that they are fully compliant with Prevent and is rolling their accredited training on Prevent Awareness to the wider university community, including Council. It already has longer-standing policies on related issues including handling sensitive issues, such as external speakers.

21. It isn't expected to. In many ways its role here is similar to that in other areas (although perhaps more high profile): concentrating on strategy, measuring performance and getting assurance that effective risk management is in place.

What is the role of the governing body in relation to the Prevent agenda?

22. It needs to satisfy itself that an appropriate set of policies are in place and are being actively and effectively implemented, that there are effective communication channels both within the university and with outside organisations, and that senior officers of the University are exercising appropriate judgements in line with the agreed policies. It will also need assurance that there are appropriate reporting mechanisms in place to keep HEFCE sufficiently informed.

Is there any support available for governors in tackling this area?

23. A list of links is provided at the end of Annex 1.
24. The Leadership Foundation together with the Committee of University Chairs (CUC) have hosted round table sessions for governors and chairs to discuss implications for governing bodies, and will arrange more sessions for the future. The Foundation, commissioned by HEFCE, has also produced a HE-specific Prevent training package. The materials are intended to support in-house training provision and are freely downloadable from the Safe Campus Communities' website www.safecampuscommunities.ac.uk. Information about the materials has been circulated to all Higher Education providers.

What sort of information on Prevent could come to the governing body or one of its committees?

25. A report that covers in respect of the Prevent agenda
- the institution's assessment of risk and its mitigation of that risk
 - its action plan to address the risks identified
 - its key policies (for example training, external speakers, engagement with partners)
 - arrangements for pastoral care and chaplaincy support
 - arrangements for the use of computing facilities
 - any Funding Council data reporting requirements²
 - any matters (such as serious incidents or material changes relating to Prevent) reported to a Funding Council

Some things to avoid

26. Requiring details of all events to be reported to or approved by the governing body
27. Focusing attention on one particular group
28. Policy statements that require risks to be completely mitigated
29. Developing new processes and structures, where appropriate arrangements are already in place

Greenwich University

Following the enactment of Ofsted's new Common Inspection Framework in September 2015, the university's Information Security Unit is investigating supplementary solutions for potential adoption to optimise the network monitoring and web filtering system and underpin its efforts against any internet activities that promote acts of violence and terrorism. The university uses its networks and senior contacts with other institutions to share information about external speakers and hosted a meeting of institutions across London to discuss a range of related issues and build on its links and networks in this regard. In order to support and protect academic freedom in relation to the Prevent Duty, the terms of reference and operation of the university's Research Ethics Committee have been revised and its remit extended to consider security sensitive research, while the Research Ethics Policy is being updated. The University Court (governing body) receives regular updates on the university's Prevent-related activity, on at least a termly basis, as part of its legal oversight responsibility, and is required to approve all relevant documentation.

² For England Para 33 and Para 44 www.hefce.ac.uk/reg/prevent/framework

30. Putting arrangements in place that restrict academic freedom and/or freedom of speech within the law

Some questions to think about

Below are some questions that governing bodies/councils can think about or gain assurance from senior management that they are being addressed.

31. Does responsibility for Prevent (i.e. the Prevent Lead) sit at an appropriately senior level?
32. What are the major risks relating to the Prevent agenda facing the institution, what are the mitigating actions and how is progress on dealing with them reported to the governing body?
33. Have governors and board members been appropriately briefed in Prevent responsibilities and does the institution think there is any need for specific governor development in this area?
34. Have policies been reviewed in relation to the Prevent Duty? How will they be kept up to date?
35. Has any review (including Internal Audit review or peer review with other institutions) of the effectiveness of our Prevent arrangements been undertaken and were the governing body provided with the outcomes?
36. Do our arrangements reflect the individual circumstances and context of the institution?
37. Are our policies for managing external speakers sufficiently robust yet proportionate?
38. What actions have been identified and how will they be addressed?
39. What are the barriers, if any, to the implementation of the Prevent Duty? How will they be overcome?
40. What is the training strategy for the staff, students and volunteers? How will we ensure that training is regularly refreshed?
41. What arrangements have we got in place to preserve and promote campus

University of Lincoln

At the University of Lincoln, the Board of Governors has been regularly updated through briefings from a Deputy Vice-Chancellor, who is a member of the Board and chairs our internal Prevent Steering Group. The Prevent Steering Group is responsible for maintaining oversight of our compliance with the Prevent Duty, while individual members of the group lead on areas of the action plan and report back to the Group. They work very closely with partners through the Lincolnshire Prevent Steering Group, the East Midlands HE Prevent Group and as members of UUK, ARC, AHUA and other bodies where sector information and best practice is shared. All of the information that colleagues gather is fed back into the Steering Group and used to inform action planning and prioritisation. The Steering Group is an essential element in bringing together colleagues from different perspectives, facilitating the sharing of information and good practice and enabling the Deputy Vice-Chancellor to ensure that the Board are kept well informed and can be alerted to any areas of concern as soon as they arise.

Cardiff Metropolitan University

Cardiff Metropolitan began its Prevent response some three years ago. It developed its 'Radicalisation and Indoctrination Research Hub' because it felt there was simply no clear research basis for implementing policies and protocols for protecting its students. It rapidly developed an understanding of how radicalisation occurs in HEIs and linked its research through other areas of expertise. This led to a very broad and singular risk assessment which formed the basis of its Prevent platform. The university found that the training programmes available simply did not support its detailed analysis on radicalisation. It therefore developed its own accredited postgraduate programme (which has now been made available as an option to those wishing to participate across Wales) structured through five 'Tiers' which are tailored to different staff requirements, the most complex being two days (15 credits) on the Masters of Education Programme. This process is also directly linked to its evolving action plan providing positive feedback to the training programme. The key, to everything they do, is 'flux'. The threat is always changing and evolving and so too must Cardiff Met's response. Therefore, review and continuing research is constant.

harmony?

42. How have academic staff been involved or engaged in the development of our approach?
43. Do we have a clearly defined approach to recruitment, training and oversight of chaplains or faith providers?
44. Are we confident that we are providing staff and students with a safe environment to engage in full, open and honest academic debate?
45. Can we position this agenda not as a response solely to the Prevent agenda but rather as a way of protecting and safeguarding students and engaging with local communities?
46. Are there adequate pastoral care/welfare arrangements in place for both students and staff? Do we have adequate internal mechanisms for escalating concerns, and for seeking external advice when necessary?
47. Are there any issues over the use of university branding at off-site events?
48. What is the response of the Students' Union to this agenda?
49. What information has the governing body received on the effectiveness of relationships with external bodies such as the HE Prevent coordinators, local authority coordinators or police coordinators?
50. What are the future challenges in relation to the Prevent agenda that the governing body needs to be aware of?
51. When will the next Prevent Duty risk assessment take place? Is this effectively integrated into our corporate risk assessment?
52. What significant issues have occurred in relation to Prevent over the reporting period and how have we dealt with them? What changes have we implemented as a result of any serious incidents? Are there areas where we require more support from external partners?

Annex

1. Specific areas on which Higher Education institutions (HEIs) are expected to deliver in order to comply are:
 - External speakers and events
 - Leadership (and arrangements to ensure institution-wide embedding)
 - Partnership (including regional Prevent coordinators from the Department for Education (DfE), Channel Panels, local authorities)
 - Risk assessment
 - Action plan
 - Staff training
 - Welfare, pastoral/chaplaincy support
 - IT policies
 - Students' Unions and societies

External speakers

2. Every university will need a policy in place for the management of events on campus. These policies should encompass, 'all staff, students and visitors and clearly set out what is required for any event to proceed.'
3. When making a decision about speakers and events, this responsibility needs to be discharged and weighed up against the duty to ensure freedom of speech, and the protection of staff and student welfare.
4. In 2013, Universities UK published guidance for HEIs on approaches to ensuring freedom of speech on campus which includes a summary of the legal position, effective approaches for external speaker processes and case studies for dealing with external speakers.
5. Statutory guidance makes clear that, 'Encouragement of terrorism and inviting support for a proscribed terrorist organisation are both criminal offences. HEIs should not provide a platform for these offences to be committed.'
6. When determining whether or not to proceed with an event, the HEI will consider whether the views expressed, or likely to be expressed, risk drawing people into terrorism. Where events with extremist speakers are allowed to proceed, speakers with opposing views should be included as part of that event and not in a separate forum.
7. All such events on or off site should have an appropriate risk rating and plan.
8. The Safe Campus Communities website has further links on external speakers and events.

Partnership

9. HEIs are expected to engage actively with other partners that can support this agenda, which would include the DfE FE and HE Prevent coordinators. Due to the complexity of HEIs, it would be expected that there would still be a single point of entry for operational contact for external partners.
10. As relevant HEIs may also wish to liaise with other national bodies including the Association of Chief Police Officers (ACPO), the National Extremism Tactical Co-ordination Unit (NECTU), the Welsh Extremism and Counter-Terrorism Unit (WECTU), the Association of University Chief Security Officers (AUCSO), the National Union of Students (NUS) and the Association of Managers of Student Services in Higher Education (AMOSSHE).

Risk assessment

11. All HEIs will want to carry out a risk assessment for their institution to determine the extent to which their students are at risk of being drawn into terrorism. Attention will usually be given to non-violent, as well as violent extremism.
12. When considering risk assessment this will take into account welfare, but also appropriate regard for the equality and diversity of staff. Risk assessment procedures will need to cover staff, students and visitors to the HEI estate.

Staff Training

13. In order to comply with the duty, HEIs will need to demonstrate a willingness to offer training to those who would be considered to benefit from training. There are a number of providers of training to support this including a [Jisc Workshop to Raise Awareness of Prevent \(WRAP\)](#).
14. Training should also include guidance on an understanding of when to make referrals to the Channel programme.
15. Universities UK and the Leadership Foundation have also offered training sessions aimed at both management and staff with an operational responsibility for leading on the prevent agenda in your institution. The Leadership Foundation has also produced a suite of online training materials, available from the [Safe Campus Communities](#) website.
16. DfE offers free training through its network of HE and FE Prevent coordinators.

IT policies

17. HEIs should have existing policies that relate to the use and access to IT equipment and facilities. There is an expectation that this policy should refer to the statutory duty and cover what is acceptable/unacceptable in relation to the duty.
18. Particular consideration should be given to assessing whether extremist materials are being accessed for academic or non-academic purposes. Institutions should also consider whether it would be appropriate to implement web filtering.
19. In October 2012, Universities UK published guidance on [Oversight of security-sensitive research material in UK universities](#).

Students' Unions and societies

20. The approach to Prevent will need to take into account the relationship with the Students' Union and any other appropriate societies. Institution-wide policies will need to be implemented to determine what may or may not take place on campus.
21. Policies should also set out clearly what expectations and contribution are expected from the Students' Union. And there is an expectation that the institutions and Students' Union will work closely together in order to implement this.
22. Students' Unions are charitable bodies, and as a result are regulated by the Charities Commission. Consideration should be given as to whether it would be beneficial for any training to be extended to elected officers or staff of the Students' Union.

Additional Resources

Bates Wells and Braithwaite London LLP (2015) [Prevent Duty: NUS Guidance for Students' Unions](#). London: National Union of Students.

Charity Commission (2013) [Compliance Toolkit: Protecting Charities from Harm](#). London: Charity Commission.

HEFCE (2015) [The HEFCE Monitoring Framework](#). Bristol: Higher Education Funding Council for England.

Higher Education Prevent Working Group (2015) [Good Practice Guide for Scottish Higher Education Institutions](#)

Home Office (2015) [Revised Prevent Duty guidance for England and Wales](#)

Home Office (2015) [Prevent Duty guidance for higher education institutions in England and Wales](#)

Home Office (2015) [Prevent Duty guidance for higher education institutions in Scotland](#)

Jisc [Workshop to Raise Awareness of Prevent training](#)

[Safe Campus Communities](#)

Universities UK (2013) [External Speakers in Higher Education institutions](#). London: Universities UK.

Universities UK (2012) [Oversight of security-sensitive research material in UK universities](#). London: Universities UK.

E-learning resources available through Safe Campus Communities website

Train the trainer resources on Prevent
www.safecampuscommunities.ac.uk/training

Introduction to Prevent e-learning module
www.safecampuscommunities.ac.uk/training/resources-module

The Introduction to Prevent e-learning module can also be uploaded to your institutions learning management system or intranet
www.safecampuscommunities.ac.uk/training/prevent-training-materials-e-learning

All links accessed November 2016