



Evaluation
August 2017/12

Evaluation of monitoring of the Prevent duty in higher education in England

This document sets out the findings and recommendations from an evaluation of HEFCE's role as monitor of the Prevent duty in higher education in England, and of the framework in which HEFCE monitors the relevant higher education bodies who are subject to its monitoring.

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To	Heads of HEFCE-funded higher education institutions Heads of other relevant higher education bodies Prevent leads of '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
Reference	2017/12
Publication date	August 2017
Enquiries to	HEFCE Prevent team, email prevent@hefce.ac.uk

Executive summary

Purpose

1. This document sets out the findings and recommendations from an evaluation of HEFCE's role as monitor of the Prevent duty in higher education in England, and of the framework in which HEFCE monitors the relevant higher education bodies (RHEBs) who are subject to its monitoring.
2. The evaluation comprised four main elements: a survey of relevant higher education bodies, structured interviews with key higher education stakeholder bodies, structured interviews with relevant government departments, and internal reflections from within HEFCE (including an internal audit).

Key points

3. The feedback provided has in general been **very positive and supportive** of HEFCE's role in and approach to monitoring.
4. Over 80 per cent of respondents to the provider survey either 'strongly agreed' or 'somewhat agreed' that HEFCE's approach to monitoring had been **risk-based and proportionate**.
5. Respondents particularly welcomed the **consultative approach** that HEFCE had taken to developing its approach to monitoring.
6. Respondents felt that HEFCE had delivered a monitoring framework that effectively provided **assurance to Government** of the approach the higher education sector is taking to implementing the Prevent duty.
7. There was a clear recognition by Government of the **positive engagement by RHEBs** with the monitoring framework, and of the significant steps taken to implement policies and processes which met the requirements of the statutory guidance. Areas of good practice demonstrated by HEFCE included the establishment of the Prevent External Advisory Group,

and the running of workshops (in particular the 'What works' series) and the dissemination of the resulting guidance.

8. 80 per cent of RHEBs either 'strongly agreed' or 'somewhat agreed' that HEFCE's approach had led to **effective relationships** with RHEBs.

9. 75 per cent of RHEBs either 'strongly agreed' or 'somewhat agreed' that HEFCE had **responded to feedback** in shaping its approach to monitoring.

10. More than 80 per cent of respondents to the survey either 'strongly agreed' or 'somewhat agreed' that HEFCE had **effectively communicated** its expectations and assessment outcomes to RHEBs.

11. 70 per cent of RHEBs either 'strongly agreed' or 'somewhat agreed' that HEFCE had **successfully influenced** the higher education sector in meeting its obligations under Prevent.

12. The audit undertaken by the consultants EY noted a generally sound **system of internal control** over the plans and governance process that HEFCE has put in place to fulfil the monitoring function over Prevent.

13. A number of areas were identified where HEFCE could improve. Broadly these relate to ensuring clarity and consistency in its engagement with RHEBs, facilitating the sharing of positive practice and case studies, and providing a forum to identify and help address concerns faced by the sector through further guidance and resources, where possible. The full details of recommendations and actions already being taken forward are identified at the end of this report.

Action required

14. This report is for information only.

Background and introduction

15. Since September 2015, 'relevant higher education bodies' (RHEBs) have been subject to a statutory duty under the Counter-Terrorism and Security Act 2015 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 must consider academic freedom. Further information on how higher education (HE) providers should implement the 'Prevent duty' is set out in two sets of statutory guidance published by the Government. Both can be found at <https://www.gov.uk/government/publications/prevent-duty-guidance>.

16. The Government appointed HEFCE to monitor implementation of the duty across the higher education sector in England (excluding further education colleges that are subject to the duty which are monitored separately by the Office for Standards in Education or the Department for Education). To demonstrate 'due regard' to the duty, these higher education providers need:

- to have robust and appropriate policies and processes in place, responding to the Prevent duty statutory guidance
- to show that they are actively implementing and following these policies in practice.

17. 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. Each RHEB submitted detailed evidence during 2016 which HEFCE has assessed against the requirements of the statutory guidance. HEFCE's findings from monitoring activity in this period are set out in 'Implementation of the Prevent duty in the higher education sector in England: 2015-16' (HEFCE 2017/01).

18. In September 2016 HEFCE published an 'Updated framework for the monitoring of the Prevent duty in higher education in England' (HEFCE 2016/24), which set out HEFCE's future monitoring of higher education providers' implementation of the statutory duty. It instructs all RHEBs to submit a short annual report every year, summarising any relevant evidence that demonstrates their continuing active and effective implementation of the Prevent duty.

19. In appointing HEFCE as the monitor of implementation of the duty across the higher education sector in England, the Government set out its expectations that HEFCE would review the effectiveness of the monitoring framework during the first quarter of 2017 – and would make changes, if desirable, in the light of the review's findings. Oversight of this evaluation process was incorporated into the terms of reference for the Prevent External Advisory Group (PEAG), established to provide specialist, strategic and practical advice to HEFCE in its role as monitor of the Prevent duty. The group comprises senior leaders from a range of RHEBs, government representatives and other relevant partners.

20. This publication sets out the outcomes of this evaluation.

Evaluation

Methodology

21. In October 2016 a proposed approach was discussed and agreed with PEAG for undertaking a light-touch evaluation of the effectiveness of the monitoring framework and approach that HEFCE has developed and implemented for Prevent.

22. In January 2017 HEFCE discussed and agreed with PEAG its detailed plans for carrying out the evaluation. In addition, HEFCE gathered feedback from members of PEAG in their advisory role. It was agreed that further feedback would be gathered from stakeholder groups through the following means:

- a survey issued to the Prevent leads at all 321 RHEBs¹ monitored by HEFCE, of whom 130 responded – 50 per cent from HEFCE funded institutions and 50 per cent from other parts of the higher education sector
- structured interviews with HE stakeholder bodies (such as Universities UK, Independent HE and other HE mission groups)
- structured interviews with relevant government departments
- by correspondence with internal stakeholders (to include the HEFCE Executive and Board), including the findings of an internal audit of HEFCE's Prevent activity.

23. The questions which formed the basis of feedback from each of the stakeholder groups were broadly grouped into four themes:

- approach to monitoring
- approach to engagement
- approach to communications
- HEFCE's influence on this topic in the broader policy sphere.

A full list of the questions is provided at **Annex A**.

Key headlines

24. The feedback provided has in general been **very positive and supportive** of HEFCE's role in and approach to monitoring.

25. Over 80 per cent of respondents to the provider survey either 'strongly agreed' or 'somewhat agreed' that HEFCE's approach to monitoring had been **risk-based and proportionate**.

26. Respondents particularly welcomed the **consultative approach** that HEFCE had taken to developing its approach to monitoring.

27. Respondents felt that HEFCE had delivered a monitoring framework that effectively provided **assurance to Government** of the approach the higher education sector is taking to implementing the Prevent duty.

28. There was a clear recognition by Government of the **positive engagement by RHEBs** with the monitoring framework, and of the significant steps taken to implement policies and processes which met the requirements of the statutory guidance. Areas of good practice demonstrated by HEFCE included the establishment of PEAG, and the running of workshops (in particular the 'What works' series) and the dissemination of the resulting guidance.

29. 80 per cent of RHEBs either 'strongly agreed' or 'somewhat agreed' that HEFCE's approach had led to **effective relationships** with RHEBs.

¹ The number of RHEBs covered by the duty at the time of undertaking the evaluation.

30. 75 per cent of RHEBs either 'strongly agreed' or 'somewhat agreed' that HEFCE had **responded to feedback** in shaping its approach to monitoring.
31. More than 80 per cent of respondents to the survey either 'strongly agreed' or 'somewhat agreed' that HEFCE had **effectively communicated** its expectations and assessment outcomes to RHEBs.
32. 70 per cent of RHEBs either 'strongly agreed' or 'somewhat agreed' that HEFCE had **successfully influenced** the higher education sector in meeting its obligations under Prevent.
33. The audit undertaken by the consultants EY (formerly Ernst and Young) noted a generally sound **system of internal control** over the plans and governance process that HEFCE has put in place to fulfil the monitoring function over Prevent.
34. A number of areas were identified where HEFCE could improve. Broadly these relate to ensuring clarity and consistency in its engagement with RHEBs, facilitating the sharing of positive practice and case studies, and providing a forum to identify and help address concerns faced by the sector through further guidance and resources, where possible. The full details of recommendations and actions already being taken forward are identified at the end of this report.
35. The feedback also suggested that providers had initially devoted a substantial amount of resource in preparing to meet the duty. However, we expect that this demand on resource will decline after the initial preparatory period, and have already introduced measures to reduce burden further through a refined approach.
36. While the above quoted percentages of responses to the survey from RHEBs are very encouraging, we undertook some analysis of the respondents who gave less favourable answers. The comments accompanying these responses were examined and, while too low in number for us to draw any broad themes, they allowed us some insight into the concerns. Much of this is reflected in the relevant sections of this report. In summary the main points identified wider concerns with the Prevent duty, the burden of initial implementation, and a perceived lack of recognition of a provider's individual context or risk profile.

The approach to monitoring

A risk-based and proportionate approach

37. Through the methods identified in paragraphs 21 to 23, HE stakeholders and RHEBs were asked about the effectiveness of HEFCE's approach to monitoring Prevent in higher education. Over 80 per cent of respondents to the provider survey either 'strongly agreed' or 'somewhat agreed' that HEFCE's approach had been **risk-based and proportionate**. The feedback from higher education stakeholders was also largely positive, with a strong recognition that HEFCE had used its own understanding of higher education providers effectively and had carried out significant early consultation work in its development of the approach to monitoring and the monitoring framework. This had ensured that RHEBs were reassured about the approach to monitoring and felt involved in the shaping of it. The feedback noted that the Prevent duty in itself is not wholly popular within some providers, and some resulting tensions in implementation remain.

38. The following activities were welcomed as particular areas of good practice in HEFCE's approach:

- the establishment of PEAG to provide specialist, strategic and practical advice to HEFCE in its Prevent monitoring role
- the annual monitoring small group workshops which were set up to support RHEBs in preparing their first annual reports to be submitted to HEFCE
- the programme of 'What works' workshops, and subsequent guidance to disseminate and share positive practice among providers.

39. Among those respondents who disagreed that HEFCE had taken a risk-based and proportionate approach, the reasons given included the perception that HEFCE had taken a 'one size fits all' approach to the initial self-assessment and detailed assessment of 2016, and a suggestion that HEFCE had not recognised the specific context and risk profile sufficiently of individual providers. A number of areas were identified in which HEFCE could further support RHEBs. These were:

- facilitating the sharing of case studies and successful practice between providers
- further guidance and support on the requirements of annual reporting
- early sight of timescales, guidance and changes to the annual monitoring process.

Providing assurance to Government

40. The structured interviews carried out with relevant government departments were focused on understanding whether the approach to monitoring undertaken by HEFCE had effectively met their expectations for the monitoring of Prevent in higher education. The feedback stated that HEFCE had met these expectations and had delivered a monitoring framework that **effectively provided assurance to Government** of the approach the higher education sector is taking to implementing the Prevent duty. It recognised that HEFCE's initial implementation of its Prevent duty monitoring role, specifically its strong engagement strategy and consultative approach, had established a strong foundation of understanding and expertise; and that this would support the development of its monitoring approach across the higher education sector, and the development of future monitoring activity. When discussing the approaches taken by the range of Prevent duty monitors across other sectors, it was noted that the approach taken by HEFCE has created a robust evidence base and allowed for a constructive dialogue both with those being monitored and with Government.

41. The discussion with relevant government bodies also drew out elements of HEFCE's approach to monitoring which had laid a strong foundation for their broader objectives for the Prevent duty in higher education. These were:

- a clear understanding of the risks, threats and concerns for RHEBs, to allow for the most appropriate allocation of government resources
- evidence of the 'distance travelled' by the higher education sector in its positive engagement with the duty
- ensuring monitoring activity is not simply a 'tick-box' exercise and maintaining the intelligent and insightful dialogue established with RHEBs

- facilitating continuous improvement with the higher education sector with activities such as the 'What works' workshops.

42. There was a clear recognition by Government of the **positive engagement by RHEBs** with the monitoring framework and the significant steps taken to implement policies and processes which met the requirements of the statutory guidance. This was further reflected in the feedback from higher education providers, which highlighted how the sector's and individual providers' responses to the Prevent duty had evolved and matured since the duty came in to effect in September 2015. This included for example:

- increased staff awareness of the requirements of the duty, through training and briefing
- an increased focus on student wellbeing
- the revision and updating of existing policies, and the creation of new policies to ensure a more coherent and consistent approach to procedures such as managing external speakers and student welfare
- an increased dialogue regarding freedom of speech
- a mature understanding of the duty.

43. Some respondents identified areas which continue to prove difficult. These included:

- engaging with students' unions and academic communities
- responding to the requirements of the statutory guidance on decisions around web filtering
- the misconception among some members of staff that there needs to be a standalone 'Prevent' policy, rather than policies which meet the requirements of the duty
- developing a wider understanding of what constitutes a proportionate response to the duty, which takes into account contextual factors but is also in keeping with the approach taken by the wider sector.

44. Of the RHEB respondents, 75 per cent either 'strongly agreed' or 'somewhat agreed' that HEFCE had **responded to feedback** from the sector and other stakeholders in shaping and refining its approach to monitoring. Specific examples included:

- the change from initial detailed assessment to a light-touch, steady-state approach to monitoring through the annual reporting cycle
- in response to the concerns about Prevent raised by the sector, facilitating a workshop on IT filtering to provide greater clarity and share good practice on the statutory requirements in this area.

The resource needs

45. In the structured interviews, respondents were asked for feedback on the level of resource that has been required to meet the requirements of the Prevent duty. The feedback suggested that providers had initially devoted a **substantial amount of resource** in preparing to meet the duty, through activities including:

- creating risk assessments and action plans
- reviewing existing policies
- developing structures for taking forward changes in processes and policies
- oversight and approval by senior managers and governing bodies or equivalents
- establishing training plans and the implementation of initial training.

46. However, the expectation is that this demand on resource will decline after the initial preparatory period, once policies and processes become embedded and there is a good level of knowledge and understanding across providers' staff and students.

47. One mission group raised a concern that the impact of these resource requirements had been more keenly felt by some groups of providers: for example, smaller providers, providers with non-standard governance arrangements, and providers responding to the needs of validating or franchise partners. On the last point it was stated that, either through the differing timelines of submissions to HEFCE, or through misunderstanding what would constitute a proportionate response in different organisations, some partner universities had added to the resource needs of their franchise partners.

48. In the survey, RHEBs were asked to offer an indication of the resource input in terms of staff hours required at different levels across the organisation to respond to the requirements of the duty. This was expected to reflect the initial implementation phase, and to project how this might change in future years as the requirements moved to a steady state. The quantitative information provided by RHEBs, though accompanied by caveats recognising the difficulty of such an estimate, supports the feedback from the structured interviews. This information identified a significant amount of resource already devoted to responding to the Prevent duty, and an expectation from RHEBs that this will be lower in future years.

Internal reflection

49. An internal audit was carried out in November 2016, as a review of HEFCE's readiness to fulfil its Prevent monitoring role. This was undertaken by EY and concluded that HEFCE has established 'overall **sound system of internal control** over the plans and governance process [...] to fulfil the monitoring function over Prevent'. It concluded that the key controls tested were consistently being applied to the major internal processes it reviewed. EY observed a small number of minor ways the process might be strengthened. These have been reviewed by HEFCE and implemented.

50. As part of this evaluation HEFCE also sought feedback from its Executive team and Board. The feedback from these groups is that in general, they feel suitably informed about the work undertaken by HEFCE, but that this area of work should remain systematically under scrutiny of the HEFCE Board. It was advised that, while acknowledging the positive work undertaken by

HEFCE and providers, HEFCE must continue to ensure providers maintain this momentum in delivery of the duty in future.

Engagement

Developing and maintaining effective relationships with HE providers and bodies

51. More than 80 per cent of respondents to the survey either 'strongly agreed' or 'somewhat agreed' that HEFCE's approach had led to **effective relationships with RHEBs**. This was further supported by the responses from the relevant stakeholder bodies, which highlighted positively HEFCE's **consultative and collaborative approach** to monitoring. The particular activity that was felt to have contributed to this included:

- engagement from a named HEFCE Prevent adviser, including under difficult circumstances such as identifying and discussing potential serious incidents
- positive engagement of senior leaders in HEFCE from the outset of monitoring
- the early series of consultative events and meetings, and how they shaped the initial approach to monitoring
- the positive role of PEAG in furthering dialogue and challenging the development of HEFCE's approach to monitoring.

52. It was noted by some respondents that the individual providers that were most confident in their own responses to the Prevent duty were those that had been in more regular contact with HEFCE Prevent advisers. Some providers also felt they would have benefited from greater contact from their HEFCE Prevent adviser.

53. It was also noted that some pathway providers (providers that offer courses as a pathway to entering higher education), and other providers not funded by HEFCE but with 250 or more higher education students which are covered by the duty felt their inclusion in HEFCE monitoring of the Prevent duty had not been sufficiently clear².

54. The feedback also noted that HEFCE's relationship with the sector had been further enhanced through its work with higher education stakeholder representative bodies, though some noted there was scope for further engagement here.

Communications

Communication of expectations and outcomes

55. More than 80 per cent of respondents to the survey either strongly agreed or somewhat agreed that HEFCE had **effectively communicated** its expectations and assessment outcomes to RHEBs. The feedback from providers identified several elements which had been found particularly helpful:

- the range of documentation available through the HEFCE website
- the small group workshops in advance of the first annual report
- the use of sector representative groups to facilitate consultation and sharing of information

² Further information on the types of provider covered by the Prevent duty is set out in HEFCE's monitoring framework (HEFCE 2017/10, <http://www.hefce.ac.uk/pubs/year/2017/201710/>).

- the tailoring of communications in recognition of the diversity of RHEBs
- the availability of HEFCE Prevent advisers.

56. While much of the feedback highlighted the effectiveness of HEFCE's communication with the sector, some areas were identified where further improvement could be made. These were:

- greater sharing with the sector of positive examples and case studies drawn from the monitoring information that HEFCE holds
- better sharing of concerns or issues faced by the sector as a whole
- either templates or further guidelines for the specific types of evidence to include in the annual report to HEFCE
- more clarity on the actions identified in the outcome letters to providers
- greater awareness-raising with providers of what to expect and when
- further clarification in guidance documents regarding which providers are covered by the statutory duty (as noted above, this point relates specifically to pathway providers).

57. The relevant government departments were also asked to comment on how effectively HEFCE had communicated with them. They unanimously recognised that HEFCE had **clearly communicated** the progress made by the higher education sector in implementing the duty over the past 18 months. HEFCE's willingness to share appropriate, relevant and timely information was noted as particularly helpful in focusing resources where they can be of greater benefit, for example targeting the support available from the Department for Education's regional Prevent coordinators. There was support for HEFCE working in future with RHEBs to facilitate the sharing of case studies and positive examples of the implementation of Prevent in higher education.

Influence

HEFCE's influence on Government and higher education

58. Feedback was sought from all respondents about how successfully they felt HEFCE had positively influenced Government and the higher education sector in meeting the requirements of the Prevent duty. In response to the survey, 70 per cent of RHEBs either 'strongly agreed' or 'somewhat agreed' that HEFCE had **successfully influenced** the higher education sector in meeting its obligations under Prevent. Of those who felt able to respond to the question, 63 per cent either 'strongly agreed' or 'somewhat agreed' that HEFCE had positively influenced Government through its approach, and in particular demonstrated the progress made by the sector³.

59. Respondents commented on several elements they felt were a result of HEFCE's influence, specifically:

- a shift in government focus on Prevent to broader issues of safeguarding

³ It is possible that some RHEBs may not have felt they understood the impact of HEFCE's influence sufficiently to comment, as a significant proportion opted not to respond to this question. To avoid misrepresenting the responses, the stated figure has been adjusted to reflect this. The full response was that 11 per cent strongly agreed, 32 per cent somewhat agreed, 16 per cent somewhat disagreed, 9 per cent strongly disagreed and 32 per cent opted not to respond.

- clarity on the positive engagement and progress provided by HEFCE's report on outcomes from initial monitoring (HEFCE 2017/01), seen as very influential across the higher education sector.

60. In giving feedback on the extent to which HEFCE may have influenced the sector and Government in relation to Prevent, a number of areas were identified where further work may be beneficial to RHEBs. These were:

- clarification on the boundary between Prevent-related extremism, hate crime and other related welfare concerns, and how to manage some of the increasing focus on this area
- greater caution in how HEFCE Prevent advisers approach the follow-up questions, and the suggestion that questions felt to be inappropriate can alienate some providers
- some support for HEFCE to try to influence working across higher education and local communities
- case studies of how RHEBs are balancing their legal obligations in respect of freedom of speech and external speakers and events, and engaging with students and staff on difficult related issues
- further activity relating to continuous improvement, such as continuation of the 'What works' workshops to provide greater influence at a practical level, tailored to meet RHEBs' different needs and contexts
- use of HEFCE's monitoring function to influence the targeting of appropriate resources on the most significant issues and areas of greatest challenge
- further ensuring that Government recognises the diversity of, and the effectiveness of the response to the Prevent duty made by RHEBs.

61. The relevant government departments were also asked to comment on HEFCE's effectiveness at influencing the positive engagement of the sector with Prevent. The focus of this feedback was the report HEFCE 2017/01 and the 'What works' workshops, in which government representatives took part and at which they presented. Both of these were cited as being influential not only on the departments which have a direct involvement in Prevent in higher education, but more widely in Government, such as in the passage through Parliament of the Higher Education and Research Act.

Conclusions and recommendations

62. RHEBs, Government and wider HE stakeholders have engaged positively in responding to this evaluation, and the feedback provided has in general been very **positive and supportive** of HEFCE's role in and approach to monitoring. While concern continues regarding some aspects of the Prevent duty itself, the sector has welcomed the transparent consultative approach HEFCE has taken to developing its monitoring framework, and the proportionate risk-based approach that has been delivered as a result.

63. The feedback received through this evaluation has highlighted a number of areas for further development of HEFCE's work. These have been captured below as a series of

recommendations for HEFCE to consider in its role as monitor of the Prevent duty in higher education. We have also set out how we intend to take these forward.

64. **Recommendation 1:** HEFCE should continue to support and develop the role of the designated HEFCE Prevent adviser and their engagement with providers. In doing so HEFCE should ensure this support is equally available to all RHEBs. **HEFCE response:** We are committed to maintaining the role of the Prevent adviser and their engagement with RHEBs. We are also ensuring that we take a risk-based approach to engagement and focus effort where it is most needed, while remaining accessible to all RHEBs.

65. **Recommendation 2:** HEFCE should look at the options for repeating the pre-assessment workshops which it ran before the first submission of annual reports for the next reporting cycle. **HEFCE response:** We intend to run a series of workshops such as these in autumn 2017, as well as seeking opportunities to speak to the sector within existing commitments such as regional Prevent meetings.

66. **Recommendation 3:** In its approach to monitoring, HEFCE should continue to recognise the diversity of the higher education sector and the focus on the context of individual providers. **HEFCE response:** This is a fundamental element of our internal assessment process in line with the monitoring framework. We will reiterate our commitment to this in updated guidance to the sector on annual reporting requirements for the next reporting period.

67. **Recommendation 4:** HEFCE should develop internal guidance for HEFCE Prevent advisers who carry out post-assessment queries. **HEFCE response:** We will undertake a 'lessons learned' exercise once the annual reporting process is complete. A priority will be to develop our approach to raising queries with providers, and providing increased guidance on the nature of evidence required, to negate the need for follow-up queries wherever possible.

68. **Recommendation 5:** HEFCE should seek to be more transparent in setting out its requirements and expectations of providers in monitoring submissions, including publishing a timeline on annual reporting activity, and ensure these are communicated with sufficient notice to providers. **HEFCE response:** We will provide more support and guidance on monitoring requirements, including annual report guidance documents, publication of a timeline of annual reporting activity setting out expectations when providers should expect to hear back from HEFCE, workshops and webinars.

69. **Recommendation 6:** HEFCE should continue the work of PEAG and the 'What works' programme. **HEFCE response:** We have agreed that PEAG should continue at least into early 2018. We are currently developing plans for the next strand of our 'What works' activity.

70. **Recommendation 7:** HEFCE should maximise the opportunities for championing positive messages about how the higher education sector has responded to implementation of the Prevent duty. **HEFCE response:** We will respond to this by developing a repository of case studies, publishing findings in annual reports, holding workshops and facilitating the sharing of practice.

71. **Recommendation 8:** HEFCE should ensure a clear and robust process for identifying new RHEBs which require its monitoring. **HEFCE response:** This process will be set out in an updated version of our monitoring framework available here (HEFCE 2017/10, www.hefce.ac.uk/pubs/year/2017/201710/).

72. **Recommendation 9:** HEFCE should review its internal oversight arrangements to ensure its senior managers and Board are continually kept appropriately up to date. **HEFCE response:** We provided an update to our Board in July 2017 and plan to provide further updates annually at the end of each reporting cycle. Key issues will also be reported to the Board on an ad hoc basis as necessary. We will also ensure that our Executive are suitably appraised of key activity relating to Prevent on a regular basis.

73. **Recommendation 10:** HEFCE should ensure it is in a position to support the sector if further requirements relating to the Government's counter-terrorism strategy are introduced. **HEFCE response:** We will continue to work with Government to understand future requirements as they are emerging.

Annex A: Questions and discussion topics

Questions and discussion topics for structured interviews with government departments

- To what extent do you believe that the approach taken by HEFCE has met your expectations and requirements in relation to effectively monitoring implementation of the Prevent duty?
- Are there any aspects of the process which you think could be improved?
- Do you have any reflections on how implementation in the higher education (HE) sector in relation to Prevent has evolved or matured since September 2015? What should we particularly seek to preserve and protect in our approach in the future?
- How effectively do you believe that HEFCE has communicated outcomes relating to Prevent in a timely and efficient manner to you and your team?
- Do you have any reflections on the approach taken by HEFCE in comparison with other monitoring bodies for Prevent?
- Do you have any comments on how our approach has fostered working between HEFCE and your department?
- Do you have any thoughts on how HEFCE has influenced your department's understanding of how HE has responded to the Prevent duty?
- Do you have any thoughts on how the work of HEFCE, and of the sector, has been received more widely in Government? How has HEFCE influenced this?
- Do you have any other comments on the approach taken to date?

Questions and discussion topics for structured interviews with sector stakeholder bodies

- How far do you believe that the approach taken by HEFCE has been risk-based and proportionate in ensuring that relevant higher education bodies are effectively monitored? Are there any areas of practice by HEFCE which you feel could be improved?
- How do you feel HEFCE's approach has enabled it to develop relationships effectively (or otherwise) with HE providers in relation to compliance with the Prevent duty? Do you have any reflections on how implementation in the HE sector in relation to Prevent has evolved or matured since September 2015?
- Do you have any broad reflections on the level of resource that has been required in institutions to meet the requirements of the Prevent duty in accordance with the approach set out by HEFCE?
- Do you have any comments on the approach that we have taken to date in communicating our expectations to providers and communicating assessment outcomes? What has worked? What could be improved?

- To what extent do you think HEFCE has successfully influenced opinions on Prevent in the HE sector and with Government? What more could be done by HEFCE to exert such positive influence?
- Do you have any other comments on the approach taken to date?

Survey questions sent to Prevent leads at relevant higher education bodies

- What type of organisation are you responding from?
 - HEFCE-funded higher education institution
 - Alternative provider with specific course designation
 - Autonomous college of the Universities of Cambridge, Oxford or Durham
 - Other provider with more than 250 higher education students.
- In ensuring that relevant higher education bodies are appropriately monitored, HEFCE has sought to take a risk-based approach. To what extent do you agree that HEFCE's approach has been risk-based?
 - Strongly agree
 - Somewhat agree
 - Somewhat disagree
 - Strongly disagree
 - N/A.
- In ensuring that relevant higher education bodies are appropriately monitored, HEFCE has sought to take a proportionate approach which reflects relevant higher education bodies' own assessment of Prevent-related risks in their own context and decides on appropriate actions in response to this assessment. To what extent do you agree that HEFCE's approach has been proportionate?
 - Strongly agree
 - Somewhat agree
 - Somewhat disagree
 - Strongly disagree
 - N/A.

Do you have any further comments?

- Do you have any reflections on how implementation in your provider in relation to Prevent has evolved or matured since September 2015?
- Do you have any reflections on how implementation in the higher education sector more broadly in relation to Prevent has evolved or matured since September 2015?
- In ensuring that relevant higher education bodies are appropriately monitored, HEFCE has sought to respond to feedback. To what extent do you agree that HEFCE has responded to feedback in its approach to monitoring?
 - Strongly agree
 - Somewhat agree
 - Somewhat disagree
 - Strongly disagree
 - N/A.

Do you have any further comments?

- Are there any areas in which you feel HEFCE could better support you in meeting the requirements of the Prevent duty?
- To what extent do you agree that HEFCE's approach has enabled it to develop effective relationships with higher education providers in relation to compliance with the Prevent duty?
 - Strongly agree
 - Somewhat agree
 - Somewhat disagree
 - Strongly disagree
 - N/A.

Do you have any further comments?

- To what extent do you agree that the approach taken by HEFCE has effectively communicated our expectations of you and the outcomes of assessments to you?
 - Strongly agree
 - Somewhat agree
 - Somewhat disagree
 - Strongly disagree
 - N/A.
- Are there any particular aspects of HEFCE's approach to communications that could be improved?
- To what extent do you agree that HEFCE has successfully influenced opinions on Prevent in the higher education sector
 - Strongly agree
 - Somewhat agree
 - Somewhat disagree
 - Strongly disagree
 - N/A.
- To what extent do you agree that HEFCE has successfully influenced opinions on Prevent within Government?
 - Strongly agree
 - Somewhat agree
 - Somewhat disagree
 - Strongly disagree
 - N/A.
- What more could be done by HEFCE to exert a positive influence on the higher education sector or Government?
- Thank you very much for taking part in this survey. If you have further comments please add them here.

Note: An additional set of questions included in the survey related to resource requirements. These asked for estimates for staff hours required in the implementation of RHEBs' response

to the Prevent duty, and an estimated forecast for future years. The analysis from this part of the survey will be incorporated into a business impact target impact report which will be published in due course.