

Prevent duty monitoring framework

Year one evaluation

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Introduction

Purpose

- 1. This document sets out the findings and recommendations from an evaluation of the first year of implementation of the Office for Students' (OfS's) strengthened and risk-based Prevent monitoring framework¹ launched in September 2018.
- 2. The evaluation comprised four main elements:
 - i. a general survey of 307 higher education providers
 - ii. a focused survey of providers that have participated in a Prevent review meeting
 - iii. structured email questionnaires with key higher education stakeholders and relevant government departments
 - iv. roundtable discussions with key Prevent higher education stakeholders.

Key points

- Feedback provided has in general been **supportive** of the OfS's risk-based monitoring framework.
- Overall perceptions of Prevent have **improved significantly** in higher education institutions since 2015.
- Respondents particularly welcomed the consultative approach that the OfS had taken to
 developing its approach to monitoring.
- There is evidence that increasingly Prevent is being **embedded** into wider institutional welfare and safeguarding procedures.
- Providers are **very satisfied** that guidance from the OfS regarding monitoring requirements has been clear.
- Providers are **very satisfied** with the structure of Prevent review meetings.
- Providers are satisfied with the communication and consultations they have had with the OfS.
- Providers are **satisfied** with the Prevent review meeting process and, overall, feel it has been a positive experience.
- Several **areas for development** were identified from our evaluation, including issues around the development of staff training and communications with the OfS. These are set out in detail on pages 22-23 of this report.

¹ See <u>www.officeforstudents.org.uk/publications/prevent-duty-framework-for-monitoring-in-higher-education-in-england-2018-19-onwards/</u>.

Background

- The Prevent duty became a legal requirement for relevant higher education bodies (RHEBs) under the Counter Terrorism and Security Act in 2015. This requires providers to 'have due regard to the need to prevent people from being drawn into terrorism'.
- 4. The Secretary of State for Education delegated to the Higher Education Funding Council for England (HEFCE) the role of monitoring compliance of the Prevent duty in higher education in England between 2015 and 2018. The OfS took over that responsibility in April 2018, replacing HEFCE as the monitor of the Prevent duty in England.
- 5. The previous monitoring framework² and approach developed by HEFCE required providers to submit detailed annual reports on their implementation of the Prevent duty. These reports generally included qualitative evidence of areas relating to the statutory guidance such as providers' approaches to working collaboratively with local Prevent partnerships, and the implementation of core Prevent-related processes such as student welfare and safeguarding, and external speakers and events policies. Providers were also required to provide quantitative information on numbers of staff undergoing Prevent training; the number of events or speakers referred to the highest decision maker according to their policy; and Prevent-related welfare case management. The reports were submitted alongside a declaration that the governing body or proprietor was satisfied that their institution was showing 'due regard' to the Prevent duty.
- 6. The first three years of monitoring showed a high compliance rate across the sector: there was strong evidence that providers had successfully embedded Prevent within their wider welfare policies and procedures.

A more risk-based approach

- 7. The OfS's approach to Prevent monitoring, while building on the HEFCE framework, also takes it in a new direction. In 2018-19 we implemented a strengthened, more risk-based monitoring framework, which has regard to our duties under the Higher Education and Research Act 2017 (HERA) to use the OfS's resources effectively and efficiently.
- The new framework reflects the OfS's broader approach to regulation. It upholds and
 maintains baseline compliance requirements, focuses regulation where we consider the
 highest risk of non-compliance to be, and seeks to reduce regulatory burden for
 compliant providers.

² Available at

- 9. The core elements of the new framework are:
 - a. an annual accountability and data return (ADR) (all monitored providers)
 - b. an ongoing programme of Prevent review meetings with higher-risk providers, new entrants to the sector and with a random representative sample of other providers
 - c. ongoing assessments of changes of circumstances and serious incidents (all monitored providers)
 - d. detailed assessments of Prevent-related policies and processes for new entrant providers, followed by a Prevent review meeting.
- 10. A separate risk assessment of providers' regard to the duty and potential for non-compliance runs in parallel with these core monitoring processes. Our risk assessment process is informed by previous compliance history and information shared from key Prevent partners and wider regulatory processes and conditions associated with the OfS's regulatory framework for higher education³. This enables us to focus our regulatory engagement with providers through heightened monitoring, for example through Prevent review meetings.
- 11. We recognised that providers would need time to respond to the OfS's revised Prevent and wider regulatory requirements, so the approach to monitoring for the 2018-19 academic year has been a transition year. We have also used this period to test and evaluate our approach to monitoring, through a series of roundtables events, surveys and email questionnaires in September 2019.
- 12. The methodology and findings of this evaluation are detailed below.

Evaluation methodology

- 13. Our research processes were:
 - a. An online survey issued to the Prevent leads at all 307 providers monitored by the OfS. We received 141 responses from providers, of which 17 providers had been subject to a Prevent monitoring review and therefore answered additional questions related to that process
 - b. A questionnaire issued to a number of key higher education sector bodies
 - c. A questionnaire issued to a number of relevant government departments; roundtables with higher education Prevent and safeguarding leads from individual providers monitored by the OfS and with sector bodies.

³ Available at <u>www.officeforstudents.org.uk/publications/securing-student-success-regulatory-framework-for-higher-education-in-england/</u>.

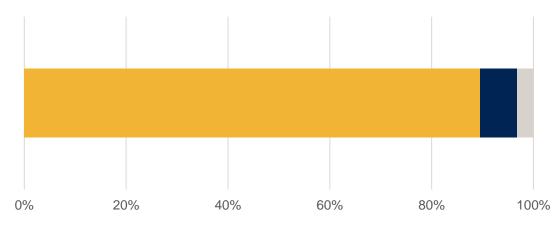
- 14. The questions which formed the basis of feedback from each of the stakeholder groups were broadly grouped into four themes:
 - i. Changing perceptions of Prevent across the higher education sector and the embedding of Prevent into safeguarding systems
 - ii. The OfS's approach to engagement and communication
 - iii. Effectiveness of approaches undertaken by the OfS
 - iv. Evaluation of the Prevent review meeting process implemented by the OfS.

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

Analysis of surveys

- 15. This section of the report focuses on an analysis of the surveys completed by providers as part of our evaluation. See Figure 1 for a breakdown of the type of providers who took part in the evaluation.
- 16. In total we had 141 responses. Of these, 124 were completed by providers who had been through the OfS accountability and data return process but had not been subject to a Prevent review meeting.
- 17. A further 17 respondents completed the general questionnaire but also responded to additional questions concerning their experience and evaluation of the Prevent review meeting process.
- 18. We asked a mixture of questions to give us both quantitative and qualitative data.

Figure 1: What type of provider are you? (Q1)



- Registered with OfS Autonomous college Non-registered but >250 HE students
- 19. We have summarised the main points emerging from the quantitative and qualitative findings in the sections below focusing on key questions from the surveys.
- 20. We have collated and themed the qualitative feedback and these comments are reflected in the text boxes.
- 21. The full list of questions and charts can be found in Annex A of this report.
- 22. The vast majority of respondents (89.5 per cent) were registered with the OfS, 7.8 per cent were autonomous colleges and 3.2 per cent non-registered providers (see Figure 1).

Perception and embedding

This section of the analysis looks at the changing perception of Prevent within providers and the general embedding of Prevent as a safeguarding issue.

Figure 2: Do you think perceptions of the Prevent duty have improved at your provider since its introduction? (Q3)

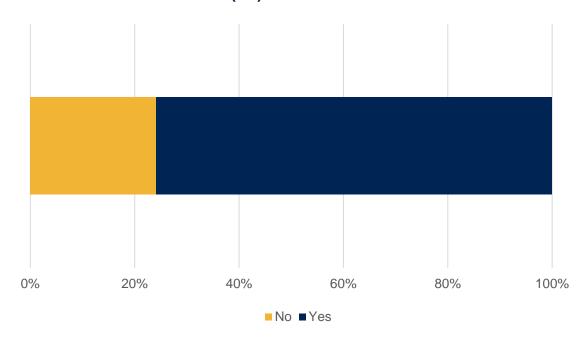
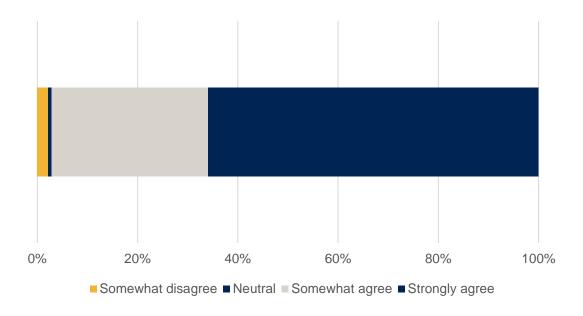


Figure 3: To what extent do you agree that Prevent has been embedded as part of your provider's overall approach to safeguarding people? (Q7)



Perception and embedding – analysis

Responses to Q3 (see Figure 2) demonstrate that, since the inception of the duty in 2015, perceptions of Prevent have improved significantly, with over three-quarters of respondents reporting positive changes to their perception of Prevent.

This is reinforced by responses to Q7 (see Figure 3): for the vast majority of providers, Prevent is now generally viewed as a wider safeguarding issue rather than purely a security issue. Only 2 per cent of respondents disagreed with the statement.

Qualitative feedback from respondents indicated that:

- a. Training of staff has greatly assisted in developing understanding of Prevent within institutions
- b. Improved communications from the OfS has assisted in developing an understanding of the Prevent duty particularly with regards to safeguarding
- c. Prevent leads within institutions have been instrumental in ensuring embedding of Prevent into wider safeguarding approaches.

Perception and embedding - areas for development

- a. More effective communication from the OfS to develop further in-depth understanding of Prevent across the sector, and particularly within the student body.
- b. Development of a more nuanced training package that reflects emerging local risks and the evolving nature of extremism, and that positions Prevent clearly as part of wider safeguarding structures generally.
- c. Greater emphasis on sharing of case studies with the sector to encourage providers to share effective practice and positive outcomes.
- d. More training sessions from the OfS around safeguarding and Prevent, such as 'what works' programmes, in order to share effective practice and develop consistent approaches across the sector.

Burden and responsiveness of the OfS's approach

This section provides an analysis of the OfS's approach to monitoring the Prevent duty in terms of reducing the administrative burden placed on providers and the responsiveness of the OfS to feedback on the new risk-based monitoring approach. In this section the results are split between those providers who went through the Prevent review meeting process and those who did not.

Figure 4: To what extent do you agree that the OfS's approach to monitoring the Prevent duty has reduced the burden at your provider? (Q9)

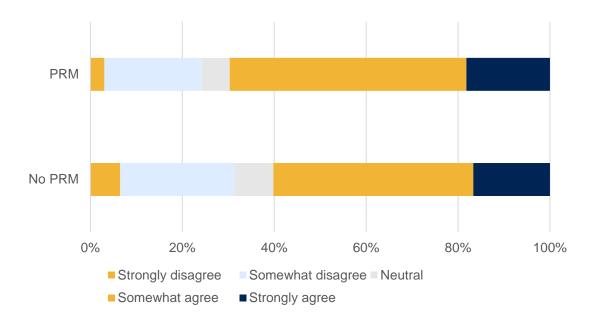
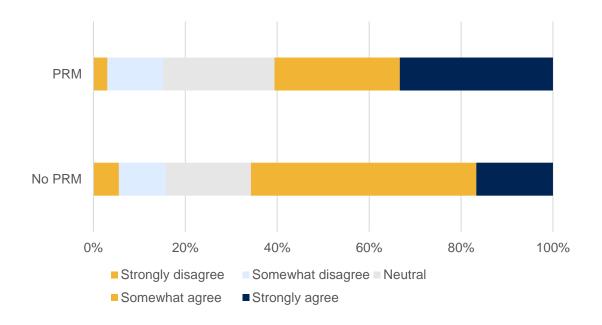


Figure 5: To what extent do you agree that the OfS has responded to feedback in our approach to monitoring the Prevent duty? (Q11)



Burden and responsiveness of the OfS's approach – analysis

Responses to Q9 (see Figure 4) demonstrate that, for the majority of providers, the administrative burden of completing the new monitoring framework has decreased.

Responses to Q11 (see Figure 5) demonstrate that most providers feel that the OfS has responded proactively to feedback in our approach to monitoring the Prevent duty.

Qualitative feedback from providers revealed that:

- a. Providers felt that it was too early to fairly assess levels of reduced burden as
 the new risk-based approach was still relatively new and needed to bed in for a
 couple more years
- b. Some providers felt that their own internal processes had increased the burden on them as they still had to produce annual reports for governing bodies. Further consideration is therefore required on how to balance governance requirements with the OfS requirements
- c. Webinars, updated internal guidance and workshops were cited as evidence of effective ways to provide constructive feedback and advice.

Burden and responsiveness of the OfS's approach – areas for development

Providers felt that the OfS needs to do more work with providers to develop the sector's understanding of what data is required, and why and how it is used for monitoring purposes. There was still some confusion around the rationale and purpose for the collection of welfare data and enhanced communications with providers was necessary to ensure consistency with the 2018-19 ADR returns.

More guidance needs to be given to providers on the contextual information required to support the data in the ADR and how providers should structure responses.

Providers indicated they wanted the OfS to continue to develop an effective communication strategy to support them implement the Prevent duty. This included the publication of effective practice case studies and positive outcomes, continuation of regular webinars, and sector workshops.

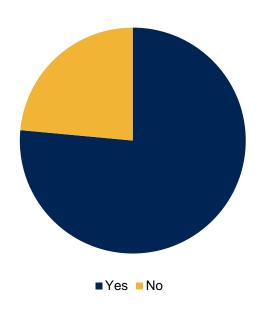
Supporting the sector's understanding of the Prevent duty

This section analyses the extent to which providers feel that the OfS has been proactive in making the monitoring guidance clear, and the extent to which providers feel the OfS has been proactive in helping the sector understand and implement the duty within their institutions.

Figure 6: Has the OfS taken proactive steps to help your understanding of the Prevent duty? (Q15)



Figure 7: Has the Prevent guidance from the OfS to the sector been clear? (Q17)



Supporting the sector's understanding of the Prevent duty - analysis

Q15 responses (see Figure 6) demonstrate that, for 85 per cent of respondents, the OfS was viewed as having taken proactive steps to help the understanding and implementation of the Prevent duty within institutions.

Q17 responses (see Figure 7) demonstrate that, for 80 per cent of respondents, guidance to the sector on the Prevent duty has been clear.

Qualitative feedback from providers indicate that:

- a. Providers were happy with communications from the OfS which were viewed as clear and effective. Providers particularly welcomed the use of webinars to update on key developments.
- b. Providers have found guidance and information documents helpful, particularly the recently published ADR evaluation report and also the updated guidance on 2018-19 ADR returns.
- c. Briefings and publications have been timely and clear. Providers were pleased that the ADR guidelines for 2018-19 had been published in August.
- d. Roundtables have been useful in developing relationships and clarifying understandings around the embedding of the duty within institutions.

Supporting the sector's understanding of the Prevent duty – areas for development

Consider developing a named OfS point of contact relationship to develop understandings and discuss issues. Providers felt that not having a direct named contact to discuss issues around guidance and implementation hindered communications.

Provide further clarification on welfare data returns. Providers felt that more guidance is needed from the OfS on the welfare data returns and the OfS's definitions of data need to be tighter.

Further clarification and guidance from the OfS on refresher training would be welcomed by providers. Generally, it was felt that there needed to be more guidance from external bodies including the OfS, the Department for Education (DfE) and the Home Office on the next phase of training.

Preparation and communication of Prevent review meetings

These questions relate directly to providers' experience of the Prevent review meeting process in terms of preparation time and the scope and purpose of the meeting.

Figure 8: To what extent do you agree that you were given enough time to prepare for the Prevent review meeting? (Q22)

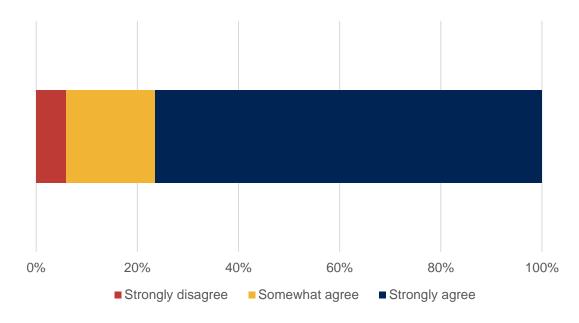
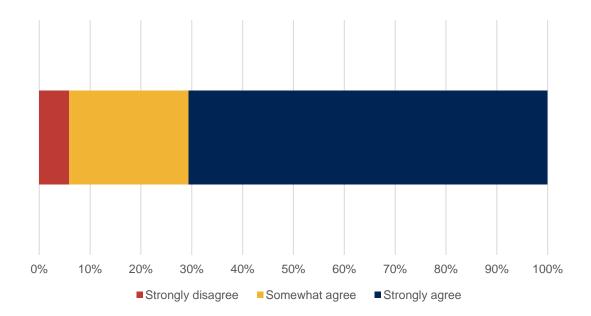


Figure 9: To what extent do you agree that the scope and purpose of the Prevent review meeting was communicated to you effectively? (Q24)



Preparation and communication of Prevent review meetings – analysis

Responses to Q22 (see Figure 8) demonstrate that the majority of providers were happy with the time given to prepare for a Prevent review meeting. Only 3 per cent of providers strongly disagreed with this.

Responses to Q24 (see Figure 9) demonstrate that for most providers the scope and purpose of the Prevent review meeting was communicated effectively. Only 4 per cent of providers strongly disagreed with this.

Qualitative feedback from providers indicated that:

- a. Timings and preparation time for Prevent review meetings were viewed by providers as being sufficient to prepare.
- b. The purpose and scope of the Prevent review meeting was viewed as appropriate and effectively communicated. Providers felt that they had all the necessary information to brief participants appropriately and to provide the information requested from the OfS.

Preparation and communication of Prevent review meetings – areas for development

Providers felt that the overall timelines for delivering the full Prevent review meeting cycle could be set earlier in the academic year (this was implemented between May and October in the 2018-19 cycle). It was suggested that this would make the process more reflective and feed into wider governance reporting structures more effectively.

Questioning and articulation

The responses to these questions are from those providers who went through the Prevent review meeting process. This section concentrates upon responses to provider feedback with regards to the suitability of questioning within the meetings and the ability of providers to clearly articulate their views within the meetings.

Figure 10: To what extent do you agree that the questions asked at the Prevent review meeting were appropriate and proportionate to your type of provider? (Q26)

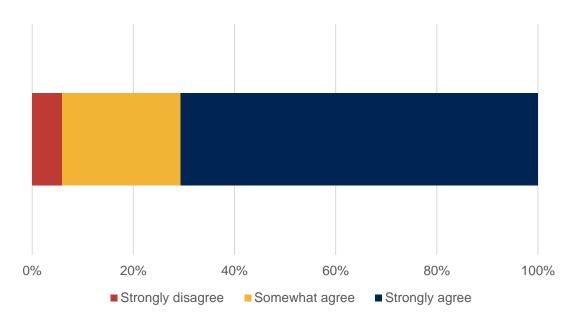
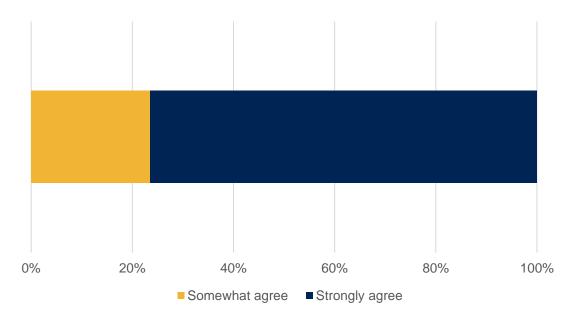


Figure 11: To what extent do you agree that the Prevent review meeting enabled you to articulate how you are implementing the Prevent duty and provided the opportunity to share effective practice? (Q28)



Questioning and articulation – analysis

Q26 and Q28 (see Figures 10 and 11) demonstrate that 95 per cent of respondents were satisfied with the structure of the questions asked in Prevent review meetings and that 100 per cent of providers felt they were given the opportunity to share effective practice.

Qualitative feedback shows that providers felt that:

- a. The Prevent review meetings were useful to understand how to implement Prevent and that the discursive exploration of themes and issues discussed in meetings was useful in determining future plans and objectives.
- b. There were sufficient opportunities to contribute and provide additional contextual information within the meeting; and the meeting provided the right context to articulate the local context of the provider.
- c. The meetings were productive, and questioning was appropriate and well targeted; OfS officers responded well to questions and offered constructive feedback and challenge to providers.

Questioning and articulation – areas for development

There were no areas for development highlighted in the feedback from providers in this area.

Despite no areas for improvement being identified, the OfS will continue to reflect upon the Prevent review meeting process and work with providers to refine and develop our approach to our risk-based approach.

Satisfaction with Prevent review meetings and process

This section summarises providers' responses to questions regarding the suitability and usefulness of their Prevent review meeting.

Figure 12: How useful did you find the Prevent review meeting? (Q30)

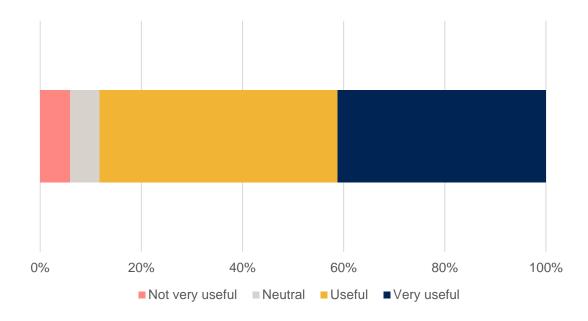
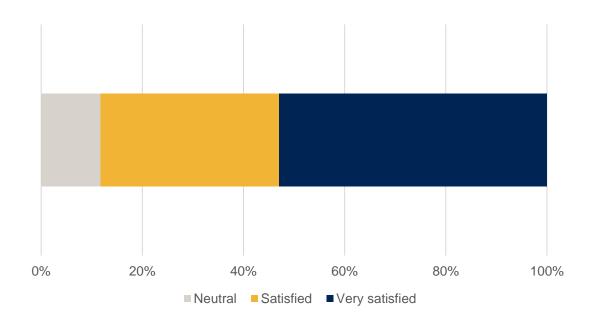


Figure 13: To what extent are you satisfied with the overall Prevent review meeting process? (Q34)



Satisfaction with Prevent review meetings and process – analysis

Responses from Q30 (see Figure 12) demonstrate that 85 per cent of respondents found the Prevent review meeting useful.

Q34 responses (see Figure 13) demonstrate that 85 per cent of providers were satisfied with the Prevent review meeting process.

Qualitative feedback from respondents indicated that:

- a. Respondents' overall experience of the Prevent review meeting process was positive. It was felt that OfS officers were approachable and knowledgeable and offered constructive challenge in the meeting.
- b. Feedback from the Prevent review meetings was constructive and clear.

 Providers appreciated the clarity of the written feedback provided by the OfS.
- c. The Prevent review meeting gave respondents good opportunities to showcase effective practice and road test their policies. Providers felt that they were able to demonstrate effective practice and were happy for the OfS to share this with the sector.
- d. Respondents felt it was much easier to articulate the approach to Prevent in a Prevent review meeting than through the annual report.
- e. Respondents were happy with the guidance received from OfS officers on the process.

Satisfaction with Prevent review meetings and process – areas for development

Providers felt that if Prevent review meetings were scheduled earlier in the year this would increase their relevance – as recommendations could then be incorporated sooner into the academic year and sector effective practice could be showcased and incorporated quicker where appropriate.

Roundtable and sector stakeholder questionnaire analysis

Summary

- 23. Through the methods identified in paragraphs 13 and 14, the OfS sought to gain a wider selection of views from the following higher education stakeholder bodies:
 - Association of Heads of University Administration
 - Guild HE
 - HEFCW
 - Independent HE
 - Office of Intercollegiate Services (Cambridge)
 - Office of Intercollegiate Services (Oxford)
 - Universities UK

We conducted the roundtable discussions with **10** prevent and safeguarding leads from a representative selection of RHEBs and sent separate questionnaires and had responses from **six** DfE regional Prevent Coordinators and **seven** higher education sector-representative bodies. Representatives from the National Union of Students were invited to the roundtable but were unable to attend. A full list of questions is provided at Annex A.

24. Overall the responses welcomed the risk-based and proportionate approach. It was generally considered that taking individual provider contexts into account had been key in the OfS refining the monitoring approach: the differing nature of provision across the higher education sector is now acknowledged in the OfS's monitoring framework. The guidance provided by the OfS was seen to have been helpful in allowing the provider to decide on what is appropriate and proportionate for their own provision. The move from an annual report to an annual data return was also generally seen as an improvement that provided a more proportionate, practical and transparent approach.

Changing perceptions of Prevent within providers and the embedding of Prevent into safeguarding systems

25. It was noted that there has been a positive change in the perceptions of the Prevent duty which have evolved since the introduction of the duty in 2015. Responses referred to a greater understanding of the Prevent duty, resulting in less resistance to the duty as it has become embedded in provider processes. Higher education sector stakeholders felt that a lot of the initial concerns about the extent of the duty's demands and how it would impact on the sector had subsided. This has been facilitated by greater transparency from the OfS, and by the DfE Further Education/Higher Education Prevent Coordinators' continued work with providers.

- 26. Additionally, there was a feeling that as the sector better understands the Prevent duty requirements there is less resistance to these requirements and the sector is much more willing to engage and share information. Feedback received highlighted that providers appear to also be generally more comfortable with what the duty is trying to achieve; for example, there is a wider acceptance that Prevent is targeting radicalisation regardless of where the ideology originates rather than specific religious groups. There is also a greater acceptance of the duty: Prevent is now being embedded as part of wider safeguarding processes and cause for concern procedures. A greater understanding has also meant that the duty is no longer seen by many as an attempt to shut down debate or infringe free speech.
- 27. It was, however, noted by all stakeholders surveyed that there are still areas of mistrust around Prevent amongst some academics, student unions, and students.

The OfS's approach to engagement and communication

- 28. Feedback received highlighted that while in the main the OfS had developed effective relationships with higher education providers more could be done to improve this. The regular meetings and correspondence with the OfS have played a major role in building on this.
- 29. Providers also considered that there had been a vast improvement in the OfS's approach to listening to the sector, and that the greater engagement, facilitated by workshops, forums and webinars, was to be encouraged.
- 30. Responses also indicated that the OfS had contributed strongly to a broad perception of the sector's compliance through a focus on welfare and publication of sector-level outcome reports. It was also considered crucial that the OfS continues to work closely with its government colleagues and be visible at higher education forums to help foster links between providers, the OfS and the DfE.
- 31. However, one area of concern shared by all higher education stakeholders surveyed was the OfS's move to a centralised general point of contact. The generic inbox and removal of named OfS contacts for individual providers was seen as a backward step; it was suggested that this could lead to an erosion in trust and understanding from the sector. The move to a named OfS regional contact has, at present, not achieved the same level of confidence as the previous single point of contact.

Effectiveness of approaches undertaken by the OfS

32. It was generally agreed that a continued move to reduce regulatory administrative burden was to be welcomed. For the most part those surveyed could see that a reduced burden was the intention of the current framework and the revised process was considered not unduly onerous. The introduction of the ADR and Prevent review meetings was also seen as a positive response to alleviate burden. It was generally felt that the levels of resource required by providers to implement the Prevent duty initially had dropped, but some providers commented that, whilst the ADR was introduced to reduce burden, they were still required to produce a lengthy annual report on Prevent to their governing body, so the reduction of burden was negligible. However, the Prevent

- review meeting process may go some way to help in this respect, i.e. a successful outcome could be fed back to the board as demonstration of compliance rather than an annual report. Another resource-heavy area highlighted was the development, delivery and monitoring of training.
- 33. The OfS's plan to seek and share examples of effective practice across the sector was welcomed, and it was further suggested that the OfS should also consider sharing positive outcomes to enhance relationships and institutional confidence. Although the ADR was viewed as a more effective way of monitoring than an annual report, sector stakeholders in particular felt that there was some unease in the sector around the collection of the welfare data in the ADR: there needed to be clearer definitions of what is required in the ADR and why. Across the surveyed stakeholders, good, clear, regular communication, transparency and developing good working relationships were seen as key in developing how the Prevent duty is perceived and implemented effectively.
- 34. Generally, the guidance the OfS has provided has been well received and considered helpful, but better clarification of the OfS's expectations of providers would be welcomed as would clarification on the OfS rationale and methodology for calculating risk. The OfS should also continue to develop confidence and trust in the sector with open dialogue at events, through newsletters and updates, and through effective links with Prevent partners to understand risk areas, define effective practice and develop ways of sharing and informing the sector through planned discussions, consultation and timetabled work streams.

Evaluation of the Prevent review meeting process implemented by the OfS

35. The Prevent review meetings were considered a good way for providers and the OfS to stress-test policies and compliance with the duty, and also to open up new lines of communication between the OfS and the providers. However, some commented that the random sampling of Prevent review meetings could not be considered a risk-based approach but conceded that it is proportionate. There was also a challenge that random sampling created a disproportionate amount of work for both the OfS and the provider in convening and preparing for the meetings.

Areas for development

This section of the report synthesises the main areas of development that have emerged from the survey findings and sector roundtables.

Effective communication with Prevent case officers

Through the different strands of our evaluation process, providers raised concerns regarding the lack of a named case officer to discuss Prevent-related issues. The OfS can reassure providers that all case officers now have regional caseloads. Therefore, if a provider emails the Prevent inbox (prevent@officeforstudents.org.uk), the relevant regional case officer will pick up that query and work directly with the provider. We will also publish the regions each OfS case officer is responsible for on our website.

Our plans for training

Providers highlighted the need for a more nuanced training package that reflects emerging local risks and the evolving nature of extremism. We will publish effective practice case studies as part of our thematic review into training⁴. We will also work with the DfE to review the current training offer and consider what more can be done to effectively support the sector in this area. We will offer 'what works' workshops during 2020.

Understanding aspects of data returns

Providers felt they needed more ongoing guidance in terms of completing their annual ADR returns. We advise any provider who has concerns or needs general assistance to view our guidance on the OfS website⁵. Alternatively, email us at prevent@officeforstudents.org.uk and the relevant case officer will work with you to resolve any queries.

Timelines

Providers felt that we needed to bring the timelines for ADR returns and Prevent review meetings forward to tie into their wider governance structures within institutions. We have since reviewed and updated our timelines.

Internal burden and ADR returns

Some providers have raised concerns that they are duplicating work, as governing bodies still require annual reports to assure them that the duty is being met within institutions. The OfS cannot comment on the requirements of individual governing bodies but would advise that institutions review internal procedures to reflect upon, and consider, any regulatory changes.

⁴ See Thematic review of Prevent duty training, available as Annex B at www.officeforstudents.org.uk/publications/prevent-review-meetings-programme-findings/.

⁵ See <u>www.officeforstudents.org.uk/publications/prevent-duty-framework-for-monitoring-in-higher-education-in-england-2018-19-onwards/</u>.

Lack of effective practice case studies

Providers have requested more examples of effective practice case studies to assist them in developing and evaluating their approach to Prevent. During 2020, we will be publishing effective practice case studies and offering 'what works' sessions for sector representatives to attend.

Prevent and free speech

Some providers were concerned that the Prevent duty is still seen as an impediment to free speech. The OfS will continue to work with providers to ensure that external events and speakers' policies are fully promoting and embedding free speech in line with the Equality and Human Rights Commission's freedom of expression guidance.

Concluding remarks

- 36. Overall, we are reassured that in the first year of our new risk-based monitoring framework that:
 - There was general satisfaction with the OfS's new risked-based approach to monitoring the Prevent duty.
 - There was general satisfaction that the OfS monitoring framework is clear and does not need any major modifications.
 - Prevent is being more widely integrated into safeguarding policies and procedures.
 - Communications between providers and other external stakeholders and the OfS were good.
 - Providers felt that the Prevent review meeting process is constructive and positive.
 - Sector bodies felt there had been a welcome move forward in the OfS's approach
 to reduce regulatory burden and develop a better understanding to reflect the
 differing nature of providers across the sector in its approach to monitoring. Sector
 bodies also appreciated the communications strategy the OfS had implemented to
 discuss issues that the sector is facing in implementing the duty.

37. However, we do recognise that:

- We need to maintain our focus on developing more effective communications with the sector and students.
- There is a need to offer and publish more effective good practice case studies to assist in helping providers further embed the Prevent duty.
- There is a need to offer advice and work with partners to help support providers in developing refresher training.
- We need to review our timelines and try to more closely align them to the academic year.
- We need to offer a point of contact for providers to clarify any issues with accountability and data returns.

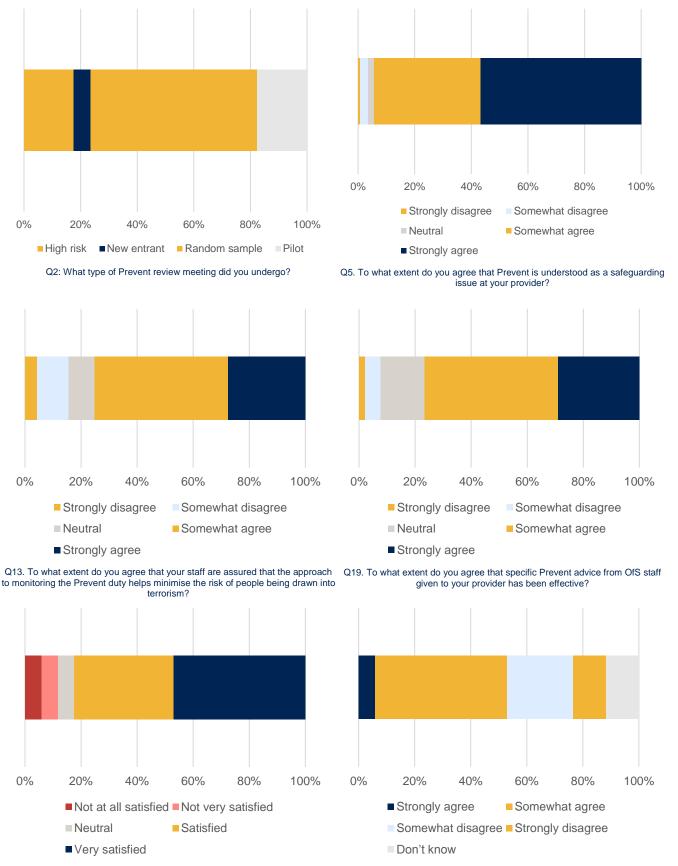
38. How we are responding:

- We will continue to provide regular updates via webinars and briefing notes to
 ensure that the sector is kept up to date with any regulatory changes or
 developments with regards to the Prevent duty. We will also consider how to
 further assist the sector in embedding the duty, for example through roundtables
 and workshops.
- We are publishing effective case study examples on our website and are also publishing our training and welfare thematic review findings⁶ alongside this report.
- We are working with the DfE to consider what more can be done to support the sector in relation to training.
- We have reviewed and updated our timelines⁷.
- Providers who email <u>prevent@officeforstudents.org.uk</u> will automatically be linked to an individual case officer to discuss and clarify any issues with the accountability and data return.
- If providers have any questions or queries regarding this report, please email mark.hilton@officeforstudents.org.uk.

⁶ See Annexes B and C at <u>www.officeforstudents.org.uk/publications/prevent-review-meetings-programme-findings/</u>.

⁷ See <u>www.officeforstudents.org.uk/advice-and-guidance/student-wellbeing-and-protection/counter-terrorism-the-prevent-duty/how-we-monitor/</u>.

Annex A: Full list of questions



Q32. To what extent are you satisfied with the feedback from the Prevent review

Q36: To what extent do you agree that doing the Prevent review meeting was more burdensome than completing the annual report?

Survey questions

Q1: What type of provider are you?

Registered with OfS; Autonomous college; Non-registered with OfS but with 250 or more Higher Education students

Q2: What type of Prevent Review Meeting did you undergo? / Did you have a Prevent review meeting (PRM)? / What interactions have you had with the OfS Prevent team?

High risk; New entrant; Random sample; Pilot / No; Yes but did not complete extended survey; Yes and completed extended survey / Annual report; Accountability and data return; Reporting a change of circumstances; Detailed assessment; Prevent review meeting (2018-2019); Reporting a serious incident; Roundtables/surgeries; Other (please specify)

Q3: Do you think perceptions of the Prevent duty have improved at your provider since its introduction?

Yes: No

Q4: Please explain your answer (word limit 500 words):

Free text field

Q5: To what extent do you agree that Prevent is understood as a safeguarding issue at your provider?

Strongly agree; Somewhat agree; Somewhat disagree; Strongly disagree; Don't know

Q6: Do you have any further comments on your response to question 5 (word limit 500 words)?

Free text field

Q7: To what extent do you agree that Prevent has been embedded as part of your provider's overall approach to safeguarding people?

Strongly agree; Somewhat agree; Somewhat disagree; Strongly disagree; Don't know

Q8: Do you have any further comments on your response to question 7 (word limit 500 words)?

Free text field

Q9: To what extent do you agree that the OfS's approach to monitoring the Prevent duty has reduced the burden at your provider?

Strongly agree; Somewhat agree; Somewhat disagree; Strongly disagree; Don't know

Q10: Do you have any further comments on your response to question 9 (word limit 550 words)?

Free text field

Q11: To what extent do you agree that the OfS has responded to feedback in our approach to monitoring the Prevent duty?

Strongly agree; Somewhat agree; Somewhat disagree; Strongly disagree; Don't know

Q12: Do you have any further comments on your response to question 11 (word limit 500 words)?

Free text field

Q13: To what extent do you agree that your staff are assured that the approach to monitoring the Prevent duty helps minimise the risk of people being drawn into terrorism?

Strongly agree; Somewhat agree; Somewhat disagree; Strongly disagree; Don't know

Q14: Do you have any further comments on your response to question 13 (word limit 500 words)?

Free text field

Q15: Has the OfS taken proactive steps to help your understanding and implementation of the Prevent duty?

Yes: No

Q16: Please explain your answer (word limit 500 words):

Free text field

Q17: Has the Prevent guidance from the OfS to the sector been clear?

Yes: No

Q18: Please explain your answer (word limit 500 words):

Free text field

Q19: To what extent do you agree that specific Prevent advice from OfS staff given to your provider has been effective?

Strongly agree; Somewhat agree; Somewhat disagree; Strongly disagree; Don't know

Q20: Do you have any further comments on your response to question 19 (word limit 500 words)?

Free text field

Q21: Are there any areas in which you feel the OfS could offer you more advice and guidance in meeting the requirements of the Prevent duty (word limit 500 words)?

Free text field

Q22: To what extent do you agree that you were given enough time to prepare for the Prevent review meeting?

Strongly agree; Somewhat agree; Somewhat disagree; Strongly disagree; Don't know

- Q23: Do you have any further comments on your response to question 22 (word limit 500 words)?

 Free text field
- Q24: To what extent do you agree that the scope and purpose of the Prevent review meeting was communicated to you effectively?
 - Strongly agree; Somewhat agree; Somewhat disagree; Strongly disagree; Don't know
- Q25: Do you have any further comments on your response to question 24 (word limit 500 words)?

 Free text field
- Q26: To what extent do you agree that the questions asked at the Prevent review meeting were appropriate and proportionate to your type of provider?
 - Strongly agree; Somewhat agree; Somewhat disagree; Strongly disagree; Don't know
- Q27: Do you have any further comments on your response to question 26 (word limit 500 words)?

 Free text field
- Q28: To what extent do you agree that the Prevent review meeting enabled you to articulate how you are implementing the Prevent duty and provided the opportunity to share effective practice?
 - Strongly agree; Somewhat agree; Somewhat disagree; Strongly disagree; Don't know
- Q29: Do you have any further comments on your response to question 28 (word limit 500 words)?

 Free text field
- Q30: How useful did you find the Prevent review meeting?

 Very useful; Useful; Neutral; Not very useful; Not at all useful
- Q31: Do you have any further comments on your response to question 30 (word limit 500 words)?

 Free text field
- Q32: To what extent are you satisfied with the feedback from the Prevent review meeting?

 Very satisfied; Satisfied; Neutral; Not very satisfied; Not at all satisfied
- Q33: Do you have any further comments on your response to question 32 (word limit 500 words)?

 Free text field
- Q34: To what extent are you satisfied with the overall Prevent review meeting process?

 Very satisfied; Satisfied; Neutral; Not very satisfied; Not at all satisfied

Q35: Do you have any further comments on your response to question 34, or any suggestions for how the process might be improved (word limit 500 words)?

Free text field

Q36: To what extent do you agree that doing the Prevent review meeting was more burdensome than completing the annual report?

Strongly agree; Somewhat agree; Somewhat disagree; Strongly disagree; Don't know

Q37: Do you have any further comments on your response to question 36 (word limit 500 words)?

Free text field

Q38: Do you have any further comments you would like to add?

Free text field



www.nationalarchives.gov.uk/doc/open-government-licence/version/3/