

ACCOUNTABILITY AND DATA RETURN 2020 - PREVENT

Background

1. The Prevent duty became a legal requirement for higher education providers under the Counter Terrorism and Security Act in 2015.
2. Higher education providers are required to meet two specific duties:
 - a) to have 'due regard to the need to prevent people from being drawn into terrorism' (the Prevent Duty) section 26(1)
 - b) to 'give to the monitoring authority any information that the monitoring authority may require for the purposes of monitoring that body's performance in discharging [the Prevent duty] as required by section 32(2)
3. Compliance by providers registered with the Office for Students (OfS) is demonstrated annually through the Accountability and Data Return process to show that we have given due regard to the Prevent duty in the previous year.
4. The substantive requirements for Goldsmiths College are to:
 - assess the risks associated with Prevent and draw up a plan to mitigate these
 - have effective welfare support systems, linking to DfE Prevent coordinators, local authorities or the police if necessary
 - have systems for assessing and mitigating risks around external speakers and events on campus, while maintaining the existing duty to promote freedom of speech
 - arrange ongoing Prevent training for relevant staff
 - have an IT usage policy and where appropriate a research policy which cover the Prevent duty
 - engage with students and ensure that students' unions and societies are aware of policies concerning activities on campus
5. The OfS has a monitoring framework outlining four core mechanisms it will use to fulfil its role as the monitoring authority:
 - accountability and data returns (ADR)
 - programme of Prevent Review meetings (PRM)
 - reporting of serious incidents and material changes
 - thematic review and supporting continuous improvement
6. In light of the global coronavirus pandemic, in May 2020 the OfS published and update to its Prevent Monitoring Guidance for higher education providers. This reminded providers that the requirements of the Counter-Terrorism and Security Act (2015) remained in place and that providers must continue to take steps to safeguard students and staff from radicalism. The OfS confirmed that during the pandemic, it would prioritise its regulatory activity and engagement where they had significant compliance concerns and with providers that are newly subject to the Prevent Duty. All providers continued to be required to report material changes and serious Prevent-related incidents. The guidance prompted all providers to:
 - review risk assessments
 - consider what was needed to raise awareness and understanding of the risks and threats of people being drawn into terrorism online

- consider whether safeguarding arrangements required amendment to allow concerns to be raised remotely
- consider how welfare concerns relating to students might be identified and managed where students are now studying remotely and overseas
- notify the OfS if policies relating to safeguarding and welfare changed substantively
- consider whether training or awareness raising needed updating to empower and support staff and students in understanding how to respond to concerns in the changed operating environment
- review External Speakers and Events protocol to identify if it covers online events

2020 accountability and data return

7. The College is due to submit its next ADR by noon on 1 December 2020 covering the period between 1 August 2019 to 31 July 2020.
8. The consequences of the coronavirus pandemic have fundamentally changed the way in which many providers have operated in the reporting period and this is likely to have had an impact on how providers continue to show due regard to preventing people from being drawn into terrorism. On that basis, the OfS has made two minor amendments to the requirements of the return (as outlined in the updated guidance published in October 2020 at: <https://www.officeforstudents.org.uk/publications/prevent-monitoring-guidance-for-accountability-and-data-returns-2020/>) which are:
 - removal of the requirement to report the broader number of welfare cases and instead asking for alternative evidence displaying how the broader welfare provision is being implemented (which has been provided by the College as a case study)
 - where applicable, asking providers to outline how they have responded to the impact of the coronavirus pandemic in continuing to prevent people from being drawn into terrorism

All other requirements remain the same.

9. The return submission consists of:
 - an outcomes-based data return with a short qualitative narrative - the Accountability and Data Return (ADR)
 - a signed declaration from the governing body - the annual accountability statement

The College's ADR is at Appendix A and the accountability statement is provided at Appendix B.

10. In the submission of the accountability statement, the College's governing body is required to confirm that throughout the reporting period, the College:
 - has had due regard to the need to prevent people being drawn into terrorism (the Prevent duty)
 - has provided to OfS all required information about its implementation of the Prevent duty
 - has reported to the OfS in a timely way all serious issues related to the Prevent duty, or now attaches any reports that should have been made, with an explanation of why they were not submitted

- has reviewed, and where necessary, updated its Prevent risk assessment and action plan

Additionally, for the 2020 return, the statement should also include information about the College's response to the pandemic in relation to the Prevent duty and also provide confirmation that its ongoing welfare arrangements remain effective in practice. This is provided in the accountability statement provided at Appendix B. Members are asked to note that the statement is also supported by the provision of a case study (to evidence the effectiveness of the welfare arrangements described).

11. Council is asked to approve the College's submission. The Chair of Council is asked to sign the accountability statement.

12. To assist Council members, the following information and assurances are provided to demonstrate how the College has continued to have due regard to the Prevent duty throughout the reporting period.

13. Outcome of 2019 ADR: the OfS confirmed that through the 2019 ADR process the College had demonstrated due regard and there was no future risk of non-compliance. Additionally, the College has not been subject to a PRM as a consequence of its 2019 return or during the reporting period.

14. Reporting of serious incidents: it is for each higher education provider to determine what constitutes a serious Prevent-related incident which should be reported to the OfS, but we are expected to include incidents or developments that:

- have led to the review and substantive revision of Prevent-related policies
- have caused reputational harm or harm to staff or students
- could be reasonably perceived as being related to Prevent

This would not cover business as usual, for example, straightforward referrals to the Channel process or informal contact with the police or local Prevent partners.

The College has not needed to report any potential serious incidents during the reporting period, which is consistent with previous years.

15. Reporting of material changes: there are five categories that the OfS consider to be material changes within a provider that warrant reporting to the OfS:

- a. Significant changes to policies as previously assessed by the OfS
- b. Changes of responsibility for Prevent
- c. Changes of control
- d. Changes to location (eg new campus)
- e. Changes to teaching provision

The College has not needed to report any material changes under a – d above. However, in light of the coronavirus pandemic and in line with government restrictions in place the College moved the remainder of its teaching online from March 2020. This falls within the reporting period for the purposes of the 2020 ADR.

16. Risk assessment: the College's risk assessment has been reviewed (copy at Appendix C) and contains the following changes:

- identification of new hazards and associated mitigating actions relating to the closure of the campus and the move to online teaching that fell within the reporting period
- minor changes relating to changes in internal staffing arrangements
- updates on actions taken in the previous year and falling within the reporting period

Beyond the identification of new hazards now included (and that represent new risk ratings) there are no material changes to the risk ratings.

17. ADR 2020: a copy of the ADR is provided at Appendix A. This requires us to report on three categories as follows:

- there have been 0 referrals related to Prevent in the reporting period. The OfS has removed the requirement to report the number of wider student welfare cases reported externally so this no longer appears, though a statement concerning the College's approach to welfare is now included in the accountability statement
- there has been an increase in the number of events considered and approved through the College's procedure for approving events with external speakers (3 reported in 2018/19 and 15 reported in 2019/20). This is as a result of wider awareness of the procedure across campus. Members are also asked to note that 2 events were cancelled due to the closure of campus
- there is a change in how we are reporting Prevent-related training by staff. The total numbers are broadly similar to previous returns, but the numbers in each category have been changed to refine our submission in regard to training.

Outcome of 2020 ADR

18. The OfS will review ADR submissions by early 2021 alongside other information, including previous returns. The OfS will not write to every provider with a compliance judgement. If the OfS have no concerns as a result of a provider's submission it will confirm that their review is completed and that no further information is required. Where the OfS does identify a cause for concern, a compliance judgement will be made that either the provider needs to take further action(s) or that the provider does not demonstrate due regard for the Prevent duty. Where non-compliance with the duty is determined by the OfS this will likely result in a referral to DfE.

Prevent annual accountability statement

Throughout the year and up to the date of approval, Goldsmiths:

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

Accountability statement

Governing bodies/proprietors are required to provide a short statement outlining how they have shown due regard to the Prevent duty and the evidence they have used to assure themselves.

Additionally, we require:

1. Written information detailing how the provider can continue to be assured that their welfare arrangements to identify and manage Prevent-related cases are effective in practice. Please use supporting evidence.
2. A summary of how the provider has responded to any impact of the pandemic in continuing to comply with the Prevent duty.

The completed statement should be no longer than two pages.

Council is assured that the College has met its responsibilities in relation to the Prevent duty.

We know that our Senior Management Team has been briefed regularly on the expectations of the OfS as a regulator; it has reviewed our risk profile and it has been alerted to any issues arising from the implementation of our Safeguarding policy. There have been no serious incidents during the period that have required reports, but had they occurred this would have been shared with the Chair of the Board.

As a Board we have been appraised of the responsibilities we have in relation to Safeguarding and Prevent compliance as part of our annual briefing/training. New Council members have received information as part of their induction. Prevent reporting is raised at Council's Audit & Risk Committee as well as Full Council twice a year as a minimum.

With regard to policy effectiveness, we know that policies are kept under active review – for example the College's Safeguarding Policy has been revised and published in November 2020 following approval by Council. The revised Policy makes explicit that the College's Prevent responsibilities are included within its wider safeguarding measures.

With regard to the visible and demonstrable ownership of Prevent at a senior level, the Registrar & Secretary is the responsible officer. She is supported by a senior member of staff as Prevent Lead who coordinates information and activity across College departments to ensure we are compliant. The

Prevent Lead is also engaged with safeguarding and Prevent networks at local authority and sector levels.

As a result of the coronavirus pandemic, the College was closed between March and September 2020 and remaining teaching and assessment was moved to online delivery. The College took effective steps to ensure that any additional risks of radicalisation as a result of the changed operating environment were mitigated which included limiting the number of virtual platforms used for the delivery of taught sessions to those approved by the College and producing an Online Behaviour Guide for students. The provisions set out within the College's IT usage policy continued to apply, which includes direct reference to Prevent and the College continued to monitor formal channels of social media that relate to the university which would flag any concerning content in regard to radicalisation. The College's policy concerning external speakers continued to apply during this period, and two events scheduled to take place on campus were cancelled.

Since October 2020, the College has reopened and has moved to blended provision between online and physical teaching. Adjustments to all support services, including student welfare arrangements are in place, to ensure that these can be delivered in practice regardless of the operating environment in the coming year. We are assured that the College has the necessary student welfare programmes in place that will in turn ensure a continued ability to recognise the signs of radicalisation and respond appropriately. The College's revised Safeguarding Policy now in operation makes key roles and responsibilities across the College more explicit and is supported by a written procedure clarifying the steps to be taken when a welfare or safeguarding concern is identified, which would include the identification and management of any Prevent-related concern that might arise. To evidence that these arrangements are effective in practice a case study is being submitted.

Name	[Enter name of Chair of governing body or proprietor if no governing body]
Title	[Enter title]
Signed	[Paste electronic signature or sign here]
Date	[Enter date signed]

Annex – Prompts when considering the declarations and statement

Assurance

While it is for each provider to determine how best they assure themselves that their institution has demonstrated due regard to the Prevent duty and they are able to sign the declarations to OfS satisfactorily, the prompts below may guide how governing bodies and proprietors can gain the necessary assurance.

- How have Prevent-related policies or processes been monitored e.g. relating to external speakers, welfare or safeguarding processes, and is there assurance that they are effective?

- Have you been provided with appropriate information and evidence that the organisation is demonstrating due regard through relevant reports, updates etc.?
- Have staff reported any serious incidents? If so, have you been assured by how the organisation has acted, including responses to any lessons learned? Equally, have you been notified of any near misses, and again, been assured that any lessons learned have been acted upon?
- Have you been assured that Prevent has been implemented in a proportionate and risk-based manner, including considering the duty alongside other statutory obligations e.g. freedom of speech?
- Is there visible and demonstrable ownership of Prevent at a senior level at the provider?
- Are you assured that staff have received sufficient training and awareness raising to implement Prevent effectively?
- Has the provider continued to work in partnership with its Prevent partners, including statutory agencies and students?

Welfare provision

We require some information about how a provider has implemented its broader welfare provision in assuring us that Prevent-related cases will be identified and managed effectively. Providers can choose a variety of different evidence in support of this, for example:

- A case study demonstrating the implementation of the provider's welfare process.
- A description of internal governance mechanisms monitoring broader welfare activity. This could include an internal audit, safeguarding or student welfare annual report, evidence of dual assurance mechanisms being used (where they exist).
- Staff training information detailing how this provides assurance that the provider's welfare processes are effective in practice.
- Broader activity taken by the provider that would support efforts to safeguard students from radicalisation.
- Providers can submit other information, but the evidence chosen should demonstrate how this shows that their approach to welfare is effective in practice.

Responses to the pandemic

This may include considerations of changes to the risks of radicalisation within a provider's setting, of Prevent-related policies and on their effectiveness in the future to reflect any new operating context.

- Has there been any impact from a move to blend provision between online and physical teaching and as a consequence, what risks have been identified associated with complying with the Prevent duty more broadly?
- Have staff assured you that the risk assessment has been reviewed in the past 12 months?
- Have mitigations been considered, managed and planned, if not yet implemented? Given the challenges providers have faced in continuing to operate during the pandemic, we do not

expect providers to necessarily have completed all of the activities that may be necessary in response to any new or increased risks.

- What impact, if any, has there been on the implementation of Prevent-related policies such as external speakers and events policies, welfare or safeguarding policies or provision? Given the operating challenges during the pandemic, we have not required providers to temporarily amend their Prevent-related policies or expected that any longer-term changes to policies have been approved or implemented.
- For some, the impacts of the coronavirus may have been limited and therefore we do not expect a substantive response about how they continue to show due regard to the duty. However, we do expect a brief rationale for why coronavirus has not impacted a provider's approach to the duty where this is the case.

Further information available from:

Prevent duty: Framework for monitoring in higher education in England 2018-19 onwards:

https://www.officeforstudents.org.uk/media/3e9aa5d3-21de-4b24-ac21-18de19b041dc/ofs2018_35.pdf

Supplementary information note to our monitoring framework:

https://www.officeforstudents.org.uk/media/19b94eed-d2ad-4a9b-bb92-ee0b410a1f1f/ofs2018_35_a.pdf

Prevent monitoring: accountability and data return 2020:

<https://www.officeforstudents.org.uk/publications/prevent-monitoring-guidance-for-accountability-and-data-returns-2020/>

Prevent monitoring Accountability and Data return 2019-20

Provider: Goldsmiths' College

UKPRN: 10002718

In all cases this data should cover the year from 1 August 2019 to 31 July 2020.

Welfare	Number
i) Number of Prevent-related cases escalated to the point at which the Prevent lead has become involved	0
ii) Number of Prevent-related cases which lead to external advice being sought from Prevent partners	0
iii) Number of formal referrals to Channel	0
<i>Please add any further information in the free text box below which you believe would be helpful or relevant for OfS to know regarding Welfare. (max. 300 words)</i>	
<p>There were no referrals for specialist advice and support in relation to the Prevent duty during the 2019/20 reporting period. There were no Prevent-related referrals externally or to the Channel process. This is consistent with data returned in previous years.</p>	

Events & speakers	Number
i) Total number of events/speakers approved. <i>Please state whether this is an estimate or an actual figure:</i>	15
ii) Number of Prevent-related events/speakers approved with conditions/mitigations	0
iii) Number of events/speakers referred to the highest decision maker in the provider's process	0
iv) Number of events/speaker requests rejected	0
<i>Please add any further information in the free text box below which you believe would be helpful or relevant for OfS to know regarding Events & Speakers. (max. 300 words)</i>	
<p>During the 2019/20 reporting period a total of 17 events were scheduled and considered through the College's procedure. Two of these events were cancelled (prior to final approval) when the campus was closed as a result of the coronavirus pandemic and national restrictions were in place in March 2020. The total number of events has increased from the previous two submissions (2017/18 and 2019/20 returns). None of the events in 2019/20 required referral to the Registrar and Secretary.</p>	

Training	Number
i) Number of staff identified as key to Prevent delivery	400
ii) Number of key staff receiving induction Prevent training	12
iii) Number of key staff receiving refresher Prevent training	0
iv) Number of staff receiving broader welfare/safeguarding awareness training/briefing	175
<i>Please add any further information in the free text box below which you believe would be helpful or relevant for OfS to know regarding Training. (max. 300 words)</i>	

For the 2019/20 reporting period we have identified the College's new staff induction training (87 attendees), supporting staff to support students training events (35 attendees) and mental health awareness training (53 attendees) as the number of staff receiving broader welfare/safeguarding awareness training. Prevent is included as part of the College's approach to safeguarding and included within the appropriate sessions. Key staff receiving induction Prevent training in the 2019/20 reporting period includes new security staff (4 attendees) and Council members' briefing (8 attendees). This is a change in how we are reporting within these categories from previous years. Total numbers of staff receiving training is, however broadly similar to previous returns.

Goldsmiths College, University of London

Welfare case study

The following case study is provided to evidence that the College's welfare arrangements remain effective in practice. It sets out implementation of the College's welfare arrangements, as set out in its Safeguarding Policy, and details implementation of the procedures and responses from the point of reporting to conclusion.

Case Study 1

6/5/20 Anonymous disclosure made by academic department and advice sought raising safeguarding concern of adult and potential child.
Safeguarding policy shared with department.

07/5/20 Safeguarding disclosure made to student support services and escalated to Designated Safeguarding Officer in Student Support Services
Contact made with student by Student Support team
Report and support report received (reviewed by triage) disclosing further details and cases were identified and linked.

08/5/20 **Safeguarding investigation commenced** by Lead Safeguarding Officer (Student Support Services).

Outcome of investigation

- Referral outside of institution to children's services necessary
- Liaison with Data Protection team regarding referral outside of institution possibly without student consent.

11/5/20 (next working day) Contact made with student and consent requested from student to escalate to Children's safeguarding services (London Borough). Response re. consent not received.

11/5/20 Risk to minors therefore **urgent referral made by Lead Safeguarding Officer to local authority Children's services.**

13/5/20 Contact received from Local Authority and social worker assigned

14/5/20 Student support in place, regularly reviewed (weekly) and mitigations in place throughout remainder of their time at the University.