

Prevent annual accountability statement

Throughout the year and up to the date of approval, **Brunel University London**:

- 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.

In line with the University's Prevent policy, Council has delegated its authority to monitor activity in relation to the University's Prevent Duty to the Executive Board. Both the Executive Board and Council agree and approve amendments and updates to the Prevent Policy and associated documents, in addition to receiving an annual report detailing the information required by the OfS. Council approved the report to the OfS in October 2020 regarding a Prevent-related safeguarding case which had been dealt with in 2019/20 and noted the outcome of the OfS's assessment of the University's compliance with the Prevent duty for 2018/19. The University's Code of Practice to Ensure Freedom of Speech and Freedom of Expression which sets out its Events Procedure is overseen by the Secretary to Council. The University's Executive Board takes responsibility for staff compliance training, of which Prevent is one, taking the necessary steps to ensure continuation of provision of the training. Mandatory training is a standing item on the Executive Board agenda. The University continues to engage with the London Borough of Hillingdon and the multi-agency panel in all relevant Prevent issues, along with other Prevent partners such as the Department for Education, OfS and Metropolitan Police. Council is confident that Brunel University London is continuing to demonstrate due regard to the Prevent Duty.

At Brunel University London, incidents or concerns relating to any welfare issue (including Prevent related-safeguarding concerns) can be raised by all staff via the "Raise a Welfare Concern" facility on Intrabrunel. Tutors can also raise a concern via the Tutor Dashboard on BlackBoard Learn. Students, staff and third parties can also raise a concern via the [Report and Support Portal](#) and these can be submitted with contact details or anonymously. Submissions from any of these channels are also automatically emailed to the [Student Support and Welfare Team](#) inbox where the team flag the concerns for priority response that day. The Student Support and Welfare team will contact the student to which

the concern relates (if identifiable) and liaise with them directly, triaging their circumstances and connecting them with the most appropriate support. In some situations, it is necessary for the team to case manage to ensure that the student is supported throughout different stages and until resolution. This may also involve liaising with other professional and academic services on behalf of the student. Issues that involve potential safeguarding or security risks are referred to the Head of Security and Emergency Planning or University's Prevent Lead as appropriate who then consider the most appropriate way forward as per the University's Prevent Policy. Additionally, incidents or concerns may be reported directly to Security and these are then logged on the University's Oracle incident database and flagged to the Prevent Lead via the Student Affairs & Casework Team which reviews the Oracle database each day and to the Head of Security & Emergency Planning.

Oversight of student welfare is provided by the Access and Participation Committee which reports to Executive Board, as well as the Student Experience and Welfare Committee which reports to Senate. The Prevent Working Group provides strategic direction and makes recommendations to ensure compliance with the University's Prevent duty and reports annually to Senate and Council, along with Executive Board as appropriate which has delegated authority from Council in respect of the Prevent duty.

The following case study illustrates how the University's Prevent-related safeguarding procedure works in practice following a concern being raised: In early January 2020, a concern was flagged to the University's Prevent Lead regarding the content of a student's Extenuating Circumstances submission (ECs) Given the circumstances, the Prevent Lead, Head of Security & Emergency Planning and Registrar agreed that it would be prudent to meet with the student to explore the student's ECs further and assess whether there were any specific welfare or Prevent-related safeguarding concerns which required further action. In the meantime, the Prevent Lead liaised with the University's Student Support Team and Student Wellbeing to ascertain whether the student was known to their services. Enquiries were also made with the student's academic department to check whether the student was engaging with their studies and whether they had any particular concerns about the student, or had noticed a change in, for example, their behaviour. The Prevent Lead also briefed the Prevent Lead at the London Borough of Hillingdon and the HE Regional Prevent Coordinator for London. Following a meeting between the student and the Head of Security & Emergency Planning, the University's Prevent Lead and Registrar agreed that there were no concerns about the student from a potential radicalisation perspective, but that ongoing welfare support was essential and additional help should be offered to facilitate this. It was not necessary to meet with the student again, but the Prevent Lead did have further email communication with the student to check on their progress and ensure that they were getting the support that they required.

The University recognises that the coronavirus pandemic has had an impact on its work in implementing the Prevent duty. In particular, the move to a dual delivery approach of virtual/online and face to face teaching, means that both academic and professional services staff are having less face to face contact with their students. The University has worked to mitigate this impact as follows:

- The University's Prevent Working Group has reviewed and updated the University's Prevent Risk Assessment to consider the current context. In relation to the coronavirus pandemic, risk controls have been identified and include:
- Network traffic continues to be monitored by Websense;

- Additional checks in student halls of residence are taking place;
- All student welfare services remain available to students and to staff for referrals and advice, including Student Support, Student Wellbeing and the Student Centre;
- No events took place during the initial lockdown period;
- Between March and September 2020 Prevent Awareness Raising training continued to be available to staff via the online module.
- The case management of Prevent-related concerns has continued without disruption and the University's Prevent Lead liaises regularly with the University's Head of Security & Emergency Planning and other relevant colleagues where concerns arise. A report was submitted to the OfS on 19 October 2020 regarding a Prevent-related safeguarding case which continued to be monitored and handled despite the coronavirus lockdown and associated impact.
- The University's Prevent Lead arranged for an announcement to be made on the University's staff intranet titled "Tips on Prevent-related safeguarding: How to protect colleagues and students from radicalisation whilst working at home". Amongst other things, this stated: *"Given that staff and students are largely now working in their homes, it is even more challenging to identify those behaviours and vulnerabilities that could mean someone is potentially vulnerable to radicalisation. Please continue to be aware of the potential indications that could mean someone is vulnerable and on a radicalisation pathway and ensure that you are up to date with your Prevent compliance training available through Staff Development"*.
- The University is currently reviewing and updating its Code of Practice to Ensure Freedom of Speech and Freedom of Expression which sets out its events procedure. This will be done within the context of the coronavirus pandemic and is detailed in the University's Prevent Action Plan.
- Since re-starting 'in-person' Prevent awareness raising training in September 2020, emphasis has been given to the importance of staff being alert to students who may be vulnerable or needing welfare support. The training highlights that whilst this may be more difficult to spot; this may be identified by a change in the student's regularity of contact, or via comments made in an online teaching session, or in an email. Staff are reassured and reminded of the importance of passing on all welfare concerns so that they can further be considered by the Prevent Lead and relevant colleagues.
- The University's Prevent Policy is to be reviewed in 2020/21 in the context of the coronavirus pandemic.

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Title	Professor
Signed	
Date	26 th November 2020

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/>