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**Annual Report of Compliance with the Prevent Duty**

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1. **Introduction**
	1. This is the University of Bristol’s first annual report of its implementation of the Prevent Duty. It covers activity carried out by the University in pursuance of compliance with the Counter Terrorism and Security Act 2015, during the period since the University became subject to the Duty in September 2015 and 1st December 2016 (this report’s due date).
	2. As the compliance body on behalf of HM Government, HEFCE requires that the University produce an annual report in advance of December 2016.[[1]](#footnote-1) The format required is a comprehensive report to the Board of Trustees which summarises activity and demonstrates use of a risk assessment and action plan.
		1. For returns due in December 2016, HEFCE have asked for providers to include specific comment on their approach to web filtering. Our suggested response to this is to refer HEFCE to the Summary Report submitted to them in April 2016 as part of our detailed submission, which contains our rationale not to filter. Further information can be provided if HEFCE seek it. The Prevent Compliance Group considered a paper (ref. PCG/03/01) on this earlier in the year.
		2. HEFCE have also asked for specific comment on their approach to implementing the Prevent duty with franchise partner institutions. The University does not have franchise agreements where our programmes are taught by others. In clarification of their position, HEFCE said: *‘the question we’d expect to see addressed is whether there are appropriate policies covering all Bristol students, regardless of what or where they study’*. The University has a wide range of placement arrangements. In light of HEFCE’s guidance, we will ensure that our colleagues who are working with placement providers will have relevant Prevent-related information of how to seek help if concerns are raised. The issue has been added to the Risk Assessment and Action Plan (Appendix i) to be considered during 2016/17.
	3. HEFCE ask that the chair of the Board of Trustees provide the following declarations as part of the annual report:

“Throughout the academic year and up to the date of approval, the University of Bristol:

* + 1. has had due regard to the need to prevent people being drawn into terrorism (the Prevent duty)
		2. has provided to HEFCE all required information about its implementation of the Prevent duty
		3. has reported to HEFCE 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.” We have none to report.

These declarations are considered to be made by the Board of Trustees’ approval of this report.

* 1. The report is divided into four sections.
* Section A: Summary of information submitted to HEFCE at their request in January and April 2016 (the ‘detailed submission’).
* Section B: HEFCE’s feedback on the University’s detailed submission, and progress against their recommendations.
* Section C: At the request of Audit Committee, Mazars LLP audited the University’s Prevent compliance and made recommendations. Progress against implementing the recommendations is reported in this section.
* Section D: Data on Prevent-related activities.
	1. There is information presented in this report that both the University Board of Trustees and HEFCE have already seen.
1. **Section A: Information submitted to HEFCE**
	1. This is a listing of the information supplied to HEFCE in the detailed submission in April 2016. Where there is progress information that it is useful for the Board to be aware of, it is included here. Where HEFCE and/or Mazars have recommended changes, these are detailed in sections B and C.
	2. *Risk assessment and action plan*

The University of Bristol’s internal auditors, Mazars, made recommendations on the format of both these documents, which were submitted to HEFCE in April 2016. The details of these recommendations and subsequent changes made are outlined in section 3 (and attached as Appendix i).

* 1. *Policies and procedures for approving external speakers*

The University of Bristol’s ‘Freedom of Speech Code of Practice’ was approved by the Board of Trustees in July 2016, and was submitted to HEFCE shortly thereafter. This was an agreed extension to the original April deadline.

* 1. *Senior management and governance oversight*

Arrangements for this are as described in the *Summary Report[[2]](#footnote-2)*.

* 1. *Engaging with students*

Arrangements for this are as described in the Summary *Report*.

* 1. *Training staff*

Proposals for training staff were provided. In correspondence following our submission, HEFCE requested further information about the University’s training plans and this was provided. In their feedback letter they asked for further detail. As originally planned, a detailed training proposal has been drafted. See Appendix ii.

* 1. *Sharing information internally and externally about vulnerable students*

Arrangements for this are as described in the *Summary Report*. The University has explored the possibility of setting up a formal information sharing agreement with Avon and Somerset Constabulary, who are not prepared to enter into such an arrangement.

* 1. *Pastoral care and chaplaincy support*

Arrangements for this are as described in the *Summary Report*. It is noted that in HEFCE’s summary of sector-wide practice[[3]](#footnote-3), it was considered good practice to have a ‘clearly defined approach to recruitment, training and oversight of chaplains’. Bristol has this in place though a memorandum of understanding and oversight offered by the Coordinating Chaplain, and £5k of additional funds have been made available to the Chaplaincy in 2016/17 to ensure sufficient Chaplaincy provision. HEFCE also expressed the value they place in clear faith facility usage policies, widely communicated, which have student involvement in the management of faith facilities with appropriate oversight by the institution. This is addressed in a new policy for the management of prayer and faith facilities (Appendix iii).

* 1. *The use of the University’s computer facilities*

Arrangements for this are as described in the *Summary Report*, as is an explanation for the University’s decision to not filter access to the web.

* 1. *Engaging with Bristol Students’ Union and its societies*

Arrangements for this are as described in the *Summary Report*.

1. **Section B: HEFCE’s feedback on the University’s detailed submission, and progress against their recommendations**

Following the University’s detailed submission in April 2016, HEFCE requested further detail and made recommendations.

* 1. *Review and update staff welfare policies in light of the Prevent duty.*The University does not have a specific policy for managing staff welfare. Instead, a case by case approach is taken where managers are encouraged to informally resolve problems, working with staff from the Human Resources Division. It is recognised that certain issues may require specialist input from members of staff who are trained in the Prevent duty. The University is considering delivering Tier 2 training (as outlined in Appendix ii) to HR Managers in order to improve awareness of issues related to the Duty. As there are no specialists within the Human Resources division to whom HR Managers can direct their concerns, they can sense-check any concerns with the University’s Vulnerable Students’ Support Service. Staff from the VSSS maintain links with the Regional Prevent Coordinator and can provide a meaningful external referral on a case-by-case basis. The VSSS will not take on staff casework.

	In addition, the University’s rules of conduct for staff (Ordinance 28) provides a mechanism to ensure that cases where staff members have been found to have acted unlawfully can be managed appropriately.
	2. *Development of policies and procedures for managing prayer and faith facilities.*

This is still in development and will be appended to the final version of this report to be reviewed by the Board of Trustees in November (Appendix iii).

* 1. *Further information on training plans*

A paper outlining the University’s training plans in further detail is attached as Appendix ii. This paper has been drafted in consultation with the University’s Prevent Compliance Group.

1. **Section C: Mazars’ recommendations and progress against them**

Mazars made a number of recommendations. This section details what those recommendations were and what progress has been made.

* 1. *Redraft existing risk assessment and action plan*

Mazars recommended that the risk assessment and action plan be redrafted, and made the following specific recommendations:

1. Inclusion of a pre and post risk score into the risk matrix, clearly referencing risks, and providing a score for both likelihood and severity;
2. Revision of the Risk Assessment and Action Plan in order to demonstrate a clear and documented link between risk and action;
3. Update the Action Plan so that that the risk relating to a “systematic mechanism for recording access to illegal or sensitive material” refers to staff and students.
4. The Risk Assessment and Action Plan should make reference to the geographical spread of the University’s estate, in order to demonstrate that all sites are covered, in all reasonably foreseeable circumstances.

The Risk Assessment and Action Plan have been updated to address the recommendations. They are live documents and are likely to change in future. The attached versions are a snapshot of current progress in October 2016.

* 1. *Review the Equality and Diversity Policy and include it in the Prevent risk assessment*.

The University’s Organisational Development Manager (Diversity) is satisfied that the Equality and Diversity Policy has not been breached by any Prevent duty related work.

Specific efforts have also been made in order to promote good practice by including key principles about unconscious bias in planned Prevent training for staff. These principles are developed in line with good practice carried out across the University in other areas, such as recruitment of staff.

* 1. *Train Security Services staff about Prevent*

This is included in the training plan (Appendix ii).

1. **Section D: Data on Prevent related activities**

HEFCE ask that annual reports should include data covering the past year and any supporting examples or narrative on the following areas:

* 1. *The number and proportion of staff who have received Prevent-related training*

Our proposed training programme (as outlined in appendix ii) for Prevent is currently underway. Final data including staff positions, numbers, and at what level they have been trained will be included in the final report to HEFCE in December, which will be submitted to the Board in November.

* 1. *The number of high-risk events escalated to the highest levels of approval*

No events have occurred at the University since the inception of the Prevent Duty that that have required approval at the highest level of our external speakers approval procedure.

* 1. *Welfare concerns escalated internally and shared externally with Prevent partners (such as Further Education and Higher Education Prevent Coordinators, Local Authority Prevent leads or Police Prevent teams)*

No welfare concerns related to Prevent have been raised in this way.

* 1. *Formal referrals to multi-agency Prevent processes (sometimes called ‘Channel referrals’)*

No University of Bristol Students have been referred to the local authority Channel process.

1. **Appendices.**
	* 1. Action Plan and Risk Assessment – revised October 2016
		2. Detailed training plan
		3. Management of Prayer and Faith Facilities Policy
1. HEFCE 2016/24 [*Updated framework for the monitoring of the Prevent duty in higher education in England*](http://www.hefce.ac.uk/media/HEFCE%2C2014/Content/Pubs/2016/201624/HEFCE2016_24.pdf). Paragraphs 26-46 detail the annual report requirements. [↑](#footnote-ref-1)
2. *Summary Report* refers to the *Summary of Prevent compliance arrangements not already covered in the risk assessment or action plan* paper submitted to the Board of Trustees for approval in March 2016 and to HEFCE shortly after. [↑](#footnote-ref-2)
3. Letter to the Vice-Chancellor entitled ‘Prevent duty monitoring’ from Yvonne Hawkins, Director of Universities and Colleges, HEFCE dated 20 September 2016 [↑](#footnote-ref-3)