

Prevent Annual Report for HEFCE for approval by Goldsmiths' Council meeting 30.11.16

1. Introduction

1.1 This Annual report will be submitted to HEFCE on December 1st 2016, This is the first Annual report we have submitted since the Prevent duty came into effect in September 2015. Since then we have been required to submit information to HEFCE about our approach to implementing the Prevent duty; in January 2016 and April 2016. These submissions included our risk assessment (reviewed by SMT); action plan and a range of policies that support our implementation of the Prevent duty (for example, IT Usage, Freedom of Speech, Venue Booking, Student Safeguarding).

1.2 The data submitted as part of this submission will cover the reporting period academic year 2015-16. However the narrative of this annual report covers the period since our last submission to HEFCE in April 2016.

1.3 HEFCE have specified that Annual reports should include the following:

- responses to any outstanding actions from the initial assessment phase – we have no actions outstanding;
- declarations from the governing body or proprietor – see detail below;
- evidence of on-going engagement and active implementation of the Prevent duty;
- any relevant additional information in relation to the issues of web filtering and franchise arrangements.

2. Risk Assessment and Action Plan

2.1 HEFCE requires governing bodies to seek assurance that the University has reviewed its risk assessment and action plan on an annual basis. The risk assessment should focus on where and how people might be at on-going risk of being drawn into terrorism, and the effectiveness of the mitigations that are in place.

2.1 Our institutional risk assessment and action plan was last reviewed by our Senior Management team on Nov. 1st 2016. There were no significant changes made in terms of either the identification of risks, assessment of impact or mitigating actions. There were some minor updates to the action plan for the academic year 2016-17 as well as changes in named responsible personnel. As there are no significant changes and no significant concerns raised by HEFCE, we will not be required to submit a refreshed risk assessment and action plan to HEFCE. However, we will update the risk assessment that is available for view on our own website to reflect the latest version.

3. Evidence of On-going Engagement and Active Implementation of Prevent Duty

3.1 We are required to include a short summary evidencing our on-going engagement with the Prevent duty and of active and effective implementation of the relevant institutional policies and processes, including discussion of any significant issues that have arisen over the last academic year in relation to the Prevent duty.

3.2 We continue to engage with the Prevent Duty and can demonstrate our implementation of policies which relate to the duty.

3.3 For example, we have introduced a new Student Safeguarding policy this year and issued new briefing materials and sessions for our staff to support the implementation of the policy.

3.4 We have also issued new guidance this year to support our room bookings policies where they involve external speakers. This is an area where we have been most actively engaged, largely due to the volume of events held at Goldsmiths. Whilst our Venue Booking policy requires us to check all external speakers we also have to actively consider our responsibilities in relation to Freedom of Speech policies and legislation. To date there has not been any event/speaker requests that have been rejected. We have however, suggested to event organisers in a number of cases that their event should be ticketed so as to enhance the management of the event.

3.5 In relation to student engagement with the Prevent duty it should be noted that there is a GSU policy of boycotting the Prevent duty and its implementation. However, we have met with GSU officers at their request whenever they have raised concerns about any Prevent related policy implementation. In particular, GSU officers have consistently raised their concerns about the use of the terms 'radicalisation' and 'extremism' where they lack definition and are used in very different contexts elsewhere at Goldsmiths.

3.6 In relation to staff training, we have identified which training and briefing events support information needs in relation to the Prevent duty. For example, our security contractors have always provided training modules for their staff which include reference to counter-terrorism measures and duties. To support our new Student Safeguarding policy, we will hold briefing sessions for staff to ensure they understand how the policy will work, how to make referrals and the support available to students. Our Council Members received a briefing on Compliance issues which included reference to our responsibilities in relation to the Prevent duty, But we have not, and do not intend to, provide 'Prevent-led' training events as we do not feel that is appropriate for our staff culture. For 2016-17 we will be able to identify the total number of staff who have attended Prevent-related training and briefing events.

4. Data Collection

4.1 We are required by HEFCE to return data in relation to the following areas, this is done as part of a separate reporting annex, but for ease the values for Goldsmiths for 2015-16 are given below.

- The number and proportion of staff who have received Prevent-related training – 0 (as previously reported to HEFCE, related training events had not been identified in 2015-16 academic year so nil data return).
- The number of high-risk events escalated to the highest levels of approval – 3 (these escalations are monitored through the Registrar & Secretary's Office).
- Any 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) - 0
- Formal referrals to multi-agency Prevent processes (sometimes called 'Channel referrals') - 0

5. Additional Information

5.1 The HEFCE monitoring framework requires us to report on our approach to web filtering. The Prevent duty does not specify that web filtering should be introduced by universities, rather that universities should actively consider whether a web filtering system is appropriate. SMT is currently considering a business case for the introduction of web filtering at Goldsmith, a decision is anticipated before the start of the Spring term.

5.2 HEFCE also requires institutions to report on arrangements in relation to franchise partners. Goldsmiths does not have any UK franchise partners so this is not applicable to us.

6. Outcomes of HEFCE monitoring

6.1 Through the first phase of assessment covering information submitted to date during 2015-16, HEFCE reached one of three possible outcomes about the policies and processes submitted by Goldsmiths: namely that the material HEFCE has seen satisfies the requirements of the statutory guidance.

6.2 Moving forward to the regular annual reporting phase of assessment, HEFCE will now also consider;

- whether the appropriate policies and processes remain in place, and
- whether the provider has demonstrated appropriate evidence of active implementation of policies and ongoing 'regard' to the duty's requirements.

HEFCE have published the Outcomes Decision table that they will use in future:

Table 1: Outcomes decisions

<p>Is the provider demonstrating due regard to the need to prevent people being drawn into terrorism?</p>
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Demonstrating due regard:	Further evidence needed:	Not demonstrating due regard:
<input type="checkbox"/> policies and processes satisfy the requirements of the statutory guidance and <input type="checkbox"/> there is sufficient evidence of active implementation (taking into account the provider's context).	<input type="checkbox"/> policies and processes need improvement to satisfy requirements or <input type="checkbox"/> further evidence is needed to demonstrate active implementation.	<input type="checkbox"/> policies and processes do not satisfy requirements or <input type="checkbox"/> there is inadequate or no evidence of active implementation or <input type="checkbox"/> there is significant evidence of non-implementation of policies and processes.

7. Prevent Reviews

7.1 Although this is not part of the Annual Report process, HEFCE have now confirmed that as part of the monitoring framework 'Prevent reviews', will be triggered in response to particular circumstances or risk indicators. Generally they will be face-to-face meetings or visits, and will take place only where they have been unable sufficiently to resolve concerns through correspondence, dialogue with providers and additional submitted written information.

7.2 A face-to face Prevent review could be triggered by particular circumstances which HEFCE have been otherwise unable to resolve, including:

- concerns about information provided by individual RHEBs through their annual reports, such as a lack of evidence, weak evidence, or data which indicates significant issues
- serious incident reports, reported to HEFCE either by the RHEB or a third party, where we have determined we require further follow-up
- previous Prevent concerns that we have raised have not been fully addressed
- serious concerns raised by other stakeholders, such as the Department for Education or the Home Office
- significant concerns raised by substantial changes to major policies at the RHEB or other material changes of circumstance (further information on which is included in Section 3).

8. Reporting of Serious Incidents and Material Changes

8.1 HEFCE requires institutions to report to them in a timely manner any serious incidents in relation to their Prevent duty responsibilities. Whilst it is for institutions to decide what constitutes a serious Prevent-related incident, HEFCE do expect us to include any incidents which have led to broader Prevent policies being fundamentally reviewed or revised, or have caused reputational harm (such as media coverage which raises substantive concerns) or actual harm (such as physical injury) to staff or students. HEFCE would not expect this to cover business as usual (for example, straightforward Channel referrals or informal contact with the police or local Prevent partners).

8.2 During 2015-16 Goldsmiths reported to HEFCE on just one occasion when there had been negative media coverage of two events involving external speakers and where the responsibility of the institution in relation to the Prevent duty had been raised in the press article. HEFCE confirmed that they were satisfied with the way in which we had dealt with the incident and that there was nothing materially different that we should do in the future.

8.3 There are no other serious incidents to be reported to HEFCE.

9. Declaration from Goldsmiths Council (governing body)

9.1 Council is required to make the following declaration:

‘Throughout the academic year and up to the date of approval, Goldsmiths, University of London:

- has had due regard to the need to prevent people being drawn into terrorism (the Prevent duty)
- has provided to HEFCE all required information about its implementation of the Prevent duty
- 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.’