

Prevent monitoring in higher education during the coronavirus (COVID-19) pandemic – Advice to providers

Introduction

In our letter dated 7 May 2020¹ we clarified the Prevent monitoring requirements during the coronavirus pandemic. Providers should continue to comply with the Prevent duty during this time and where possible the Office for Students (OfS) will seek to minimise regulatory burden.

We recognise that providers' modes of delivery and Prevent risk profile will have been affected by this period of disruption. This document provides advice to help providers think about Prevent-related changes they may need to make to reflect the current environment.

This document is not intended to create additional burden nor are the contents prescriptive. Applying the Duty appropriately is based on a provider's risk profile, context and size. This document forms part of the OfS's continuous improvement work to support providers to comply with the requirements of the Prevent duty.²

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¹ See www.officeforstudents.org.uk/publications/prevent-monitoring-requirements-during-the-coronavirus-covid-19-pandemic/.

² For more information on the Prevent duty, see www.officeforstudents.org.uk/advice-and-guidance/student-wellbeing-and-protection/counter-terrorism-the-prevent-duty/.

Reviewing your risk assessment and institutional approach

Why should I review my Prevent risk assessment?

Risk assessments underpin the institutional approach to Prevent duty delivery. In giving due regard to the Duty, they should be reviewed regularly to ensure that they appropriately reflect changes over time. This is particularly important in response to the coronavirus pandemic. Not only have many providers moved to a more blended approach of online and physical delivery, but wider Prevent-related risks have also shifted.

Reviewing the risk assessment should not mean complicated changes to policies and processes. It is about understanding changed Prevent-related risks and having the right responses in place to mitigate these risks. We recognise that there are additional challenges assessing and mitigating against risks for students and staff working remotely; you should consider what you can reasonably and proportionately do to mitigate those potential risks.

Things to consider

Oversight, governance and partnership working

- Has your local, regional or national terrorist risk profile been affected during the coronavirus pandemic?
- Have there been any significant changes to your daily business, organisational structure, teaching, engagement or infrastructure/estate that has or may impact on risk or awareness of risk?
- Have you given due regard to the Duty by considering what is and is not within your control, and therefore what should be encompassed by policies and procedures? For example, institutional electronic resources accessed remotely would be within your control, but it may be unreasonable to expect home networks and personal technology to be within your control.
- How are you continuing to oversee Prevent duty implementation?
- How are you maintaining relationships with key Prevent partners?

IT acceptable use and online activity

- What have you done to raise your institution's awareness and understanding of the risks and threats of people being drawn into terrorism online?
- How are you keeping yourselves informed of the wider context of delivering education online?
- Have you considered the potential implications of the risks associated with increased extremist activity online and the likely increased staff and student screen time as a result of remote working (which may lead to possible increased opportunities for some people to be influenced by terrorist content and messaging)?
- Does your IT acceptable usage policy cover remote working and the conduct expected of staff and students?

- How are you communicating the expectations of staff and students when accessing your institutional electronic resources from home?
- Do you have arrangements in place if harmful material is posted on your institution's network? i.e. a 'Notice and take down procedure' or an 'Incident handling procedure'.

Safeguarding

- How have you adapted your safeguarding arrangements in an online setting?
 - Do you have mechanisms in place to allow staff and students to raise concerns remotely? How have existing and new staff and students been made aware of these changes and what their responsibilities are?
 - Have you considered how to provide online safeguarding training to staff and students? If so, how is that different to what you are already required to do in normal times?

External speakers and events

- How have you adapted your external speakers and events procedure for an online setting?

Where can I find out more about preparing a Prevent risk assessment?

Earlier this year the OfS hosted a webinar giving guidance on how to write an effective risk assessment under the Prevent duty. A recording of the webinar and the webinar slides are available on the OfS website.³

Where can I obtain information to inform my Prevent risk assessment and access further advice?

In order to update your risk assessment, you will need to be familiar with changes to the terrorism threat and risk picture both in your locality and more broadly. **Speak to your regional further education (FE) or higher education (HE) Prevent Coordinator⁴ or other Prevent partners for advice on this.** Your regional FE/HE Prevent Coordinator can also offer bespoke advice and guidance about preparing a Prevent risk assessment for your institution.

Roles and responsibilities

What should I do if I have a welfare concern about a student who is normally based on campus but is now studying remotely from abroad?

Firstly, consideration should be given to the nature of the concerns and whether they arise from activities that are reasonably within your control, even though the student is abroad. In particular, is the source of the concern directly connected to institutional activities undertaken by your institution? For example, is the concern arising because of activities the student is undertaking through, for example connected to your institution's IT systems? If so, this should be addressed

³ Available at www.officeforstudents.org.uk/news-blog-and-events/events/prevent-risk-assessments-webinar/.

⁴ Details of the regional coordinators are at <https://www.safecampuscommunities.ac.uk/prevent/regional-coordinators>.

directly, as you should still have due regard to the Prevent Duty in respect of activities and systems you control.

Secondly, although the Prevent Duty only applies to the UK, the focus should be the welfare and support of the student involved wherever they are. As such, you may consider dealing with the concerns in the normal way according to your policies and procedures, in anticipation of their return to study in the UK.

What are my responsibilities towards students studying remotely?

Providers must have due regard to the Prevent Duty across all the areas covered in the statutory guidance, and it is our expectation that this would continue to be the case during the coronavirus pandemic. You should have policies and procedures in place across all the key areas and should continue to actively implement these. However, although providers should consider a range of risks, they cannot be reasonably expected to apply due regard to the Duty to circumstances that are beyond their control. For example, how a person uses their personal IT equipment outside of any activities directly connected to institutional business, in a way that is not captured within policy and procedure. It should be noted that, as set out in the statutory guidance, the OfS expects that providers' IT policies must contain specific reference to the Prevent duty and they should have considered using web monitoring and/or filtering to restrict access to harmful content as part of their overall strategy to prevent people from being drawn into terrorism.

Further reading: www.officeforstudents.org.uk/media/40592997-b9c4-44dc-8053-aaf85d0d739b/it-web-filtering-and-monitoring-technical-guidance-note.pdf [PDF]

How can I enact my institution's welfare policy remotely?

You should adapt your existing welfare and safeguarding policies and processes to the changed operating environment. In so doing, you should consider how you maintain internal and external communication and escalation routes for concerns, and how you oversee the implementation of these arrangements. If policies undergo substantive revision you should notify the OfS in a timely manner as part of the change of circumstance requirements.⁵

You should also consider whether training or awareness raising needs updating to empower and support staff and students in understanding how to respond to concerns in the changed operating environment.

Your regional FE/HE Prevent Coordinator can give you further advice and guidance.

⁵ Available at www.officeforstudents.org.uk/advice-and-guidance/student-wellbeing-and-protection/counter-terrorism-the-prevent-duty/how-we-monitor/#guidance

Partnerships

How can I continue to maintain or build relationships with Prevent partners and share information appropriately when everything I do now is online?

Maintaining effective relationships with Prevent partners is key to effectively implementing Prevent: it informs a provider's risk assessment, it ensures that lines of reporting and sources of advice are maintained, and it enables the sharing of effective practice with other providers.

Being proactive has never been more important. Prevent partners have adapted to remote working during the coronavirus pandemic and the mechanism for contacting them and making Prevent referrals remains the same.

There are many opportunities to keep in touch and up to date with Prevent developments, including through the FE/HE Prevent Coordinators' online network meetings and by ensuring you receive regional newsletters from the FE/HE Prevent Coordinators team.

If you require assistance your regional FE/HE Prevent Coordinator can help you to access Prevent networks, to maintain and build Prevent partner relationships and provide advice on how best to share information.

External speakers and events

How should I enact external speakers and events policies for online events?

The statutory guidance clearly specifies that Relevant Higher Education Bodies (RHEBs) should have a mechanism in place for assessing the risks associated with any events which are affiliated to, funded by or branded by the RHEB, but which take place off-campus. When deciding whether or not to host a particular speaker, RHEBs should carefully consider whether the views being expressed, or likely to be expressed, at an event constitute extremist views that risk drawing people into terrorism. Where risks are identified, we would expect risk assessments should be undertaken to determine whether any reasonable and proportionate mitigations might be put in place to reduce those risks and allow the event to go ahead.

It should be emphasised that the vast majority of speakers do not pose risks and should not lead to any additional actions or mitigations. Prevent procedures should be used solely to guard against extremist views that risk drawing people into terrorism; they should not be used to stop, or make more difficult, the airing of views that are challenging, controversial or provocative, even if some students or staff find them offensive.

As such, any event branded by or affiliated with a provider, whether physical or virtual, would need to be covered by the policies and procedures in place for external speakers and events. We would not expect a provider to significantly alter their existing policies and procedures to encompass online or virtual events. Rather, we would expect providers to apply their existing arrangements in a reasonable and proportionate manner. This would usually mean that event organisers would submit their requests in the same way as for a physical event, the request would be considered using existing approval mechanisms, and any risk mitigations would be proportionate and tailored

for the specific context of an event. The mitigations put in place, e.g. ticketing or chairing of the event, are for the RHEB and organiser to decide.

We would also expect RHEBs to balance their legal duties in terms of ensuring freedom of speech and academic freedom, while also protecting student and staff welfare when carrying out their Prevent Duty requirements. The OfS is developing regulatory guidance on the public interest governance principles relating to academic freedom and free speech.

For further advice and guidance, you should speak to your regional FE/HE Prevent Coordinator.

Effective practice

Welfare

Case study: Plymouth Marjon University

At Plymouth Marjon University, staff were reminded, both in e-forums and in appropriate meetings, of the existing reporting process to flag 'welfare' or 'academic' concerns. Early in lockdown, Programme Leaders were asked to reach out to every student in their group to ensure they knew what to expect of remote studying for the forthcoming months. Every student received contact from someone they knew well and could broach difficult subjects with. Wellbeing sessions continue to be offered to all students, albeit over video or telephone call. Where students face difficulties, these are captured as part of the welfare concern processes to track the onward support of those individuals. After every wellbeing appointment, the advisor emails those who could support the individual (e.g. disability team, counselling team), whilst the welfare concern group ensures this happened and puts any other appropriate support in place. Students' feedback has been very positive.

Partnerships

Case study: Virtual Prevent governance arrangements

Several providers have continued their internal oversight of Prevent duty implementation by holding their Prevent working groups remotely through virtual means, including inviting external partners to continue to contribute to and test their approaches.

Case study: FE/HE networks

The FE/HE Coordinators have fed back that having switched to virtual network and forum meetings they have seen heightened engagement and attendance from Prevent leads. This has allowed for continued collaboration between sector and other partners such as local police teams.

Safeguarding

Case study: University of Suffolk

The University of Suffolk has developed a tool to support good practice in safeguarding students. It is designed for higher education institutions to self-review their online safeguarding practice. See <https://www.uos.ac.uk/sites/www.uos.ac.uk/files/Higher-Education-Online-Safeguarding-Self-Review-Tool%202019.pdf> [PDF]

Case study: University of the West of England, Bristol

The University of the West of England has developed a 'Speak Up' programme. This is an online reporting tool and support programme to challenge unacceptable behaviour and provides guidance on how to intervene in a safe way. Again, while not directly related to the Prevent duty, it does provide useful processes around safeguarding and creating a safe student environment. See: <https://reportandsupport.uwe.ac.uk/support>

Further reading

<https://www.jisc.ac.uk/guides/online-safety>

<https://www.ltai.info/staying-safe-online/>

<https://www.uos.ac.uk/content/digital-civility>

Useful resources

- The Action Counters Terrorism application for business – the ACT app
- Action Counters Terrorism (ACT) website at www.gov.uk/ACT

Fact checkers

- Full Fact Toolkit: <https://fullfact.org/toolkit/>
- Snopes: <https://www.snopes.com/>
- BBC Reality Check: https://www.bbc.co.uk/news/reality_check
- Channel 4 FactCheck: <https://www.channel4.com/news/factcheck>
- Infotagion – Fact checking in relation to coronavirus: <https://infotagion.com/>
- SHARE Checklist: <https://sharechecklist.gov.uk/>