1. **Background**

This report on the University’s compliance with the Prevent Duty over the previous academic year forms part of the University’s overall assurance return to HEFCE due by 1 December 2016. The report is compliant with the requirements as set out in the HEFCE updated framework for the monitoring of the Prevent Duty in higher education in England, dated September 2016, which can be found at http://www.hefce.ac.uk/pubs/year/2016/201624/.

The HEFCE requires the Chair of the University’s Governing Body to make an annual declaration on behalf of the Governing Body in respect of the University’s compliance with the statutory duty. The University is also asked to submit a narrative report updating on its activities in respect of implementing the duty, along with a mandatory data return. The narrative report to be submitted can be that which is considered by the Governing body and as such, the University would intend to submit this report to the Council as its assurance return.

The HEFCE has indicated that the declaration of compliance and the data return should form annexes to the main paper and therefore both of these documents are submitted to the Council, noting that the Chair of Council will be invited to sign the declaration following consideration of this paper by Council at their meeting to be held on 17 November 2016.

The remainder of this paper updates the Council on the University's risk assessment, the updated action plan and relevant actions in relation to the implementation of the Prevent Statutory Duty. This paper does not duplicate the detailed submissions that have already been made to the HEFCE on this topic which are available to review on the University’s Prevent webpages:

http://www2.warwick.ac.uk/services/supportservices/prevent

2. **Responses to outstanding actions from the initial assessment phase**

The Council will be aware that the University has made two previous submissions to the HEFCE on this topic. The first was a Statement of Preparedness against the Duty, submitted in January 2016. The second was a more substantive narrative report enclosing a risk assessment and an action plan at the 1 April 2016 monitoring point.

These documents were considered through the University’s formal governance processes at the time and were subsequently published on the University’s Prevent webpages. In line with its usual practice, the University does not publish its institutional risk assessments.

The purpose of the more detailed 1 April 2016 submission was for the HEFCE to determine whether the University was paying due regard to the statutory duty and therefore compliant.
In response to the University’s submission to the HEFCE on 1 April 2016, the HEFCE sought further clarification from the University on a number of points including external speaker arrangements for branded events off campus, plans for sharing information with Prevent partners, queries around arrangements for refresher training, clarification that the routes for channel referrals were understood, capturing any third party training requirements, and clarifying policies for the management and use of faith facilities. The University’s response to the HEFCE on these points is also published on the University’s Prevent webpage.

The University received confirmation from the HEFCE in June 2016 that it was considered to be having due regard to the Statutory Duty with a corresponding request for clarification on two minor points. This outcome was reported to the University’s Steering Committee on 20 June 2016, considered by the Audit and Risk Committee on 22 June 2016, reported to the University’s Council on 13 July 2016 (via Audit and Risk Committee) and to the Senate on 6 October 2016 (via the report from the Steering Committee).

In summary, the two points were a request for an update at an appropriate point in relation to the University’s ongoing refresh of Regulation 29 which was noted as being the mechanism by which external events off campus were to be considered. The second point related to the clarity and availability of policies to users for managing the use of faith facilities.

The then Deputy Registrar invited the HEFCE Prevent contact to campus for a meeting with relevant colleagues including Rev’d Pearson, on 18 July 2016, at which it was clarified that making the room booking policy more visible to users both in the Chaplaincy and on-line would satisfy the query on the use of faith facilities. These actions were subsequently implemented in the Chaplaincy. The opportunity was also taken to update on the work then underway to review the University’s Regulation 29 on Freedom of Speech, this latter point being covered in more detail in the remainder of this report.

3. Evidence of ongoing engagement and implementation

The University is committed to providing a safe, supportive and positive environment for all members of its community. The aim is to build a sense of belonging, which is achieved, in part, through the various strands of its holistic wellbeing network – from the Wellbeing Support Services team, the Residential Life Team, the Campus Security team, the Chaplaincy, the support services provided by the Library and the personal tutor network amongst others.

Having positioned the Prevent Duty as but one part of the University’s wider support approaches to wellbeing as opposed to being regarded solely as a standalone matter, the University continues to engage with, implement and consider matters related to Prevent within the wider wellbeing context.

(a) Management and Governance Oversight of Compliance with the Prevent Duty

Following a meeting of the University’s Assembly on 11 March 2016, at which the Prevent Duty itself along with the University’s implementation of the duty was debated, the Vice-Chancellor and President has convened a review group that has met several times and comprises academic experts in the field, students, SU and Trades Union representatives, and other staff as appropriate. The purpose of the group is to provide institutional guidance on the University’s appropriate and proportionate compliance with, and implementation of, the Prevent Duty.
The University’s Steering Committee continues to have operational oversight of the Prevent Duty with reporting continuing through to other committees and to the University’s Council.

The Strategy Director (formerly the Deputy Registrar) has acted over the reporting period as the Prevent Lead for the University, working on behalf of the Vice-Chancellor and President to co-ordinate the development, execution and governance of the University’s ongoing implementation of the Prevent Duty. The Strategy Director has continued to convene an informal working group to assist with the detail of implementation, review the risk assessment and the action plan and ensure that all relevant policies remain fit for purpose.

Due to a change in the Strategy Director’s portfolio responsibility, the Wellbeing Directorate has transferred to the People Group, headed by the Director, People Group, Ms Gillian McGrattan. She will therefore become the University’s Lead Officer for Prevent with effect from 9 November 2016.

In terms of updating the Council regarding other relevant staffing changes since the 1 April monitoring point, the newly appointed Dean of Students has recently become a member of the working group – providing additional reassurance that the academic pastoral needs of students can be considered.

The Council will note from previous reports that there was a period of interregnum from the retirement of the previous Senior Tutor to the appointment to the newly configured role of Dean of Students, during which time cover was provided by senior academic colleagues.

The transition in portfolios in this space has had an impact on the ability to progress detailed consideration of personal tutor awareness raising, however this is now being actively considered by the Dean of Students as part of her overall approach to raising awareness of wellbeing issues.

The Head of Security Services remains as the nominated ‘Single Point of Contact’ (SPOC) for operational matters relating to the Duty, now reporting to the Director, People Group, and as a member of the informal Prevent working group.

The University’s Steering Committee considered this paper at its meeting on 7 November 2016 and the paper has also been the subject of discussion as one of the agenda items at an extraordinary meeting of the Senate convened on 9 November 2016.

(b) Engagement

The student body is represented on the Vice-Chancellor’s review group and continues to be represented by the Students’ Union Sabbatical Officers on the majority of the University’s Committees, thus giving them an opportunity to be involved in the decision-making processes in relation to compliance with the statutory Duty. As noted above, Academic, administrative staff, SU and Trades Union representatives are also engaged with the Vice-Chancellor’s review group.

In terms of staff engagement, in April 2016 the Strategy Director presented an overview of the Duty and the University’s implementation of it to a forum of Heads of Departments and also hosted an Administrative Director’s Networking Lunch for senior managers within the administration at which a Prevent-related presentation was given, likewise to raise awareness of the Duty. Data on the number of people
who attended these awareness events is provided in the data return under the training and engagement category.

The Head of Security Services continues to be an active member of the Regional Prevent Group which includes regional partners such as the City Council, and is engaging further on work lead by regional partners to update information sharing arrangements.

The Strategy Director and senior members of the Wellbeing Directorate, as well as members of the Secretary to Council’s Office have continued to engage in relevant sector forums, groups and attend information events, such as those hosted by the Leadership Foundation for Higher Education.

Information about Warwick’s approach to the Prevent agenda is available for all members of the University community and the wider public to view, on a dedicated area of the Wellbeing Support Services website: [http://www2.warwick.ac.uk/services/supportservices/prevent](http://www2.warwick.ac.uk/services/supportservices/prevent).

Supporting documentation such as the Prevent Action Plan and the Student Support Referral Pathway are also provided on the webpage. The University has received feedback that its pathway approach to the wellbeing support in general is considered to be good practice.

Whilst the Student Support Referral Pathway pertains to student wellbeing, the University has also recognised the importance of capturing the wellbeing support processes for staff. This was an outcome from the action plan and an equivalent pathway for staff has been developed in draft and is currently subject to internal consultation. This pathway will be presented and discussed at the meeting of the Joint Consultative Committee on 22 November 2016.

(c) **Staff training and awareness raising**

The University’s approach to training and awareness raising continues to focus on those groups of colleagues who have a role, or contribution to make, in wellbeing and safeguarding at the University. Such colleagues are invariably involved in the provision of front line services to staff and/or students.

As outlined in its action plan, the University does not anticipate the need to roll out training further beyond such colleagues, except where new staff may join, or where staff ask to be considered for training. Training and awareness raising has been undertaken on a face to face basis thus far. Consideration is being given to the appropriate format of future training and awareness raising, and e-learning packages are being investigated as a mechanism to promote awareness during this academic year.

The informal Prevent working group is undertaking a review of the recently released Leadership Foundation for Higher Education training slides to support refresher training. Consideration is also being given to the approaches adopted by other HEIs particularly in the e-learning space.

(d) **Freedom of Speech and External Speakers & Events**

The University’s commitment to freedom of speech was previously articulated in University Regulation 29 (covering Meetings on Campus etc.). This Regulation also served to document the University’s approach to external speakers. The University Senate considered proposed revisions to Regulation 29 at its meeting on 27
January 2016 and resolved that further work was required to more appropriately foreground the fundamental principle of encouraging and enabling freedom of expression within the Regulation, whilst upholding the principles of dignity and respect.

To ensure that such freedoms are protected, whilst risks of legal contraventions are mitigated, and the wellbeing of the University community is preserved, the Regulation has been rearticulated at a principle level. It is now entitled “Regulation 29 – Freedom of Speech”. It is underpinned by a suite of procedures sitting outside of regulation to operationalise other policies and practical requirements such as referencing the Dignity at Warwick policy, re-articulating processes relating to the approval of external speakers at University-branded events, and re-confirming existing procedures for booking meeting rooms on campus. These procedures cover the following:

- Institutional-level and Student-led events
- Academic departmental events
- External Conference events held on University premises

The University continues to consider the risks related to external speakers for academic departmental events and conference centre events to be very low. As such, the procedure for such events is deliberately light-touch.

The rearticulated Regulation and the supporting procedures were approved by the Senate at its meeting on 5 October 2016 and by the University's Council at its meeting on 19 October 2016. As the Council has already received and considered these papers and procedures, they are not reattached here for the Council but will form part of the submission to the HEFCE given they have been referenced in previous submissions as having been in the process of refresh.

In support of the revised Regulation, the University has refreshed its guidelines for the use of the University brand. This encompasses on-campus, off-campus and online events and serves to clearly outline the approval process for using the University name and the ways in which the University brand can be used.

The University and the SU both have an active programme of public engagement and events and there is a very good working relationship between the University and the SU in the consideration of external speaker requests. Both the University and the SU work to the principles enshrined in their respective policies on freedom of speech to enable external speaker events to take place, with appropriate risk mitigation where necessary.

During the reporting period, two external speaker requests were escalated to the most senior level of approval. Both of these requests were made by a Students’ Union Society and involved speakers who have attracted significant media interest when speaking at other HEIs in the past. Relevant colleagues, including colleagues from the Students’ Union, and led by the Strategy Director, undertook a review of both requests to identify whether there might be any associated risks requiring mitigating action related to such high profile speakers. Advice was sought from other HEIs and SU’s. Both events proceeded successfully, with appropriate conditions in place.

The Council will be familiar with the extent of external speaker requests and the associated processes having received a presentation from the Sabbatical officers of the SU about the clubs and societies work of the SU during the Council’s wider engagement programme last academic year.
(e) **Chaplaincy Support**

The University Chaplaincy, located at the centre of campus (with multi-faith prayer rooms also available elsewhere on site) is open to all members of the University community, of any or no faith [http://www2.warwick.ac.uk/services/chaplaincy/](http://www2.warwick.ac.uk/services/chaplaincy/). It is open every day during term time and staff/student cards are required to gain access out of normal working hours.

As noted above, the University has implemented the HEFCE’s minor recommendations in making the policies and arrangements for the use of Chaplaincy space clearer and more available to users.

Any member of staff and any student can book space within the Chaplaincy. The pre-existing terms and conditions for bookings and the booking forms are now available on the Chaplaincy webpages and are also displayed on the notice board at the main entrance of the Chaplaincy.

Resource has been secured for a substantive full-time Chaplaincy administrator as opposed to a part time post, to further assist with the management of the facilities and recruitment is underway.

The Council will be familiar with the work of the Chaplaincy having had the opportunity to tour the facilities, meet with representatives of faith societies and receive a presentation from the Chaplains about the positive faith and wellbeing ethos and inter-faith collaboration on campus as part of its wider engagement programme last academic year.

4. **Prevent Risk Assessment and Action Plan**

Further to the review of the Prevent Risk Assessment previously submitted to the HEFCE, there have been no significant changes in the reporting period beyond nomenclature changes and positive updates and impacts in terms of actions completed. The University still considers the risks associated with the Prevent Duty to be low at the University and the University’s contextual narrative has not changed.

The informal Prevent working group, to be chaired in future by the Director, People Group, continues to keep the risk assessment under review. The Prevent Action Plan has likewise been updated following the conclusion of a number of actions noted above.

Both documents were reported to the University’s Steering Committee on 7 November 2016 and will be submitted as part of the assurance return to ensure that the HEFCE has the most up to date documents.

5. **Additional information**

(a) **Web-filtering**

As previously reported in its 1 April 2016 submission, the University considers the implementation of pre-emptive filtering arrangements to be neither proportionate nor desirable, given the impact on the functioning of the University and the perceived lack of effectiveness of such measures. The University awaits further sector-wide developments before revisiting this matter. The University has not therefore changed its position on this point.

(b) **Franchise arrangements**
An initial review of the University’s arrangements for any third party delivery of accredited courses indicated that the vast majority of provision is undertaken by Higher Education establishments, FE colleges or other bodies already encompassed within the wider statutory Duty. The University’s Collaborative, Flexible and Distance Learning Sub-Committee has undertaken a further review at its recent meeting in November 2016 at which this position was reported not to have changed.

In May 2016, the University revised its collaboration agreements to reflect the statutory Duty. All new agreements now include a specific clause which cascades the requirement of the Duty to the University’s learning partners.

Gillian McGrattan
Director, People Group

28 November 2016