Queen Mary
University of London

Prevent Duty Annual Accountability and Data Return

Outcome requested:	Council is asked to **approve** the Prevent Duty Accountability and Data Return for 2022–23.
Executive Summary:	[a] The University is required to submit an annual accountability return to the OfS on the implementation of the Prevent duty comprising four declarations and supporting data. Compared to previous years, the data return is narrower in scope, but requests greater detail on the nature of any Prevent- related issues considered during the year and the basis on which any external speakers have been denied a platform.
	[b] Declaration 1: The University has had due regard to the need to prevent people being drawn into terrorism (the Prevent duty).
	• Our registered Prevent duty lead is the Director of Student Experience, supported by the Head of Student Wellbeing, who both attend regular briefing sessions with the Regional Prevent Co-ordinator for London.
	• Our primary routes to compliance are the Safeguarding Policy and the Freedom of Speech Policy, both of which are operating effectively and were reviewed within the last 12 months. The Students' Union provides data to the University on external speakers booked via student societies and events.
	• No external speakers were denied a platform in 2022–23.
	• All members of staff in key Prevent-related roles have completed relevant training during 2022–23. This includes 15 staff involved in the delivery of Degree Apprenticeships who received in-person Prevent training in January 2023, and 90 security staff who received training provided by the Home Office.
	• In total, 663 members of staff completed our Safeguarding Essentials e-learning course in 2022–23. We launched a dedicated e-learning course on Prevent in July 2023 and 125 members of staff completed it within the reporting period.
	• A review of the Safeguarding Officer role and network is underway to provide greater depth of knowledge across key areas.
	[c] Declaration 2: The University has provided to OfS all required information about its implementation of the Prevent duty.

	• The data return for 2022–23 is attached to this paper.
	[d] Declaration 3: The University 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.
	• There were no serious issues in 2022–23 as defined by the OfS (i.e. any incidents or developments which have led to the review and substantive revision of Prevent-related policies, have caused reputational harm or harm to staff and students and could be reasonably perceived as being related to Prevent). The OfS does not expect universities to report 'business as usual events', such as formal Channel referrals or informal contact with the police or local Prevent partners.
	[e] Declaration 4: The University has reviewed, and where necessary, updated its Prevent risk assessment and action plan
	• The risk assessment and action plan was updated in November 2022 and is attached to this paper. It will be reviewed again in the coming months.
QMUL Strategy: strategic aim reference and sub-strategies	Not applicable.
Internal/External regulatory/statutory reference points:	Counter Terrorism and Securities Act 2015 Ongoing conditions of registration with the Office for Students Prevent Duty Guidance for higher education institutions in England and Wales University Safeguarding Policy University Freedom of Speech Policy
Strategic Risks:	Compliance with the Prevent duty and ongoing conditions of registration with the Office for Students.
Equality Impact Assessment:	Equality impact assessments are undertaken whenever Prevent- related referrals are considered under the Safeguarding Policy and when Prevent-related issues arise under the Freedom of Speech Policy.
Subject to prior and onward consideration by:	Following consideration by Audit and Risk Committee, the data return must be approved by Council and submitted to the OfS by the deadline of 1 December 2023.
Confidential paper under FOIA/DPA	No
Timing:	Annual return aligned with the OfS schedule.
Author:	Chris Shelley, Director of Student Experience

Date:	8 November 2023
Senior Management/External Sponsor	Jonathan Morgan, Chief Governance Officer and University Secretary

Office for Students Prevent monitoring

Accountability and data return 2023

Validation passed

Provider: Queen Mary University of London

UKPRN: 10007775

In all cases this data should cover the year from 1 August 2022 to 31 July 2023.

Table 1: Welfare

Question	Islamist radicalisation	Extreme right-wing radicalisation	Mixed, unclear or unstable ideology	Other radicalisation	Total (automatically generated)
i) Number of Prevent-related cases escalated to the point at which the Prevent lead has become involved	4	0	0	0	4
ii) Number of Prevent-related cases which led to informal external advice being sought from Prevent partners	4	0	0	0	4
iii) Number of formal external Prevent referrals	4	0	0	0	4
For each Prevent-related case, please add information about how the case originated (e.g concerns identified from behaviour online, or through accessing material online, through external speakers or as a result of a welfare issue). Maximum 300 words.					
We received reports and screenshots from a WhatsApp group that show 4 students referring to racially motivated violence. All four were referred to the relevant local authorities.					

Table 2: Events & external speakers					
Question	Total	Health and safety	Procedural matters	Reasons related to Prevent risk	Other matters
i) Total number of events or speakers approved through the external speakers process (estimate to nearest 10 permitted)	391				
ii) Total number of events or speakers approved subject to any mitigations or conditions	18				
iii) Number of events or speakers approved subject to any mitigations or conditions due to Prevent-related risks	0				
iv) Total number of events or speakers rejected	0	0	0	0	0

Table 3: Training	
Description	Total
i) Number of staff identified as key in relation to the Prevent duty	219
ii) Number of key staff receiving induction Prevent training	105
iii) Number of key staff receiving refresher Prevent training	114

Strategic Risk Register

Reference	Risk Group	Risk Descriptor	Initial risk before any controls				Controls	Residual risk with current controls				Further Actions and Notes	Owner	Lead Officer	Strategic Objective	Term
			Impact	Likelihood	Initial Risk Score	Direction of Travel		Impact	Likelihood	Residual Risk Score	Direction of Travel					
1	2	3	4	5	6	7	9	#	11	12	13	14	16	18	19	#	21	22

Partnership and leadership

01/11/2022

1	**Active engagement from senior management**	Senior management does not implement the Prevent duty effectively.	4	3	12.0		A) The Director of Student Experience is QMUL's Lead Safeguarding Officer and Prevent Duty Lead, who chairs the Safeguarding Steering Group, which oversees policy and delivery of Prevent related activity. A) Queen Mary Senior Executive Team receives regular briefings and updates on the Prevent duty and has met with the Regional Prevent Co-ordinator. A) QMUL has effective relationships with local police and Regional Prevent Co-ordinators and a forum has been identified through which these institutional relationships are maintained. A) QMUL is actively engaged with sector-wide networks regarding the Prevent duty and for sharing information about external speakers. A) The Prevent duty is included on the strategic risk and legal compliance registers. A) The Principal's Office is part of the formal escalation process for the approval of external speakers and events.	4	1	4.0		1. Engagement is maintained through periodic reports from the QMUL Safeguarding Steering Group to Queen Mary Senior Executive, including this risk register. 2. The QMUL Prevent Duty Lead receives reports from formal liaison with the police and the Regional Prevent Co-ordinator. 3. The Chief Officers review the Strategic Risk Register regularly.	Chief Governance Officer and University Secretary	Director of Student Experience		Long-term
2	**Governance oversight by Council**	Council does not gain appropriate assurance about compliance with the Prevent duty.	4	3	12.0		A) Audit and Risk Committee and Council receive regular briefings and updates on the Prevent duty. A) The Prevent duty is included on the strategic risk and legal compliance registers.	4	1	4.0		1. Engagement is maintained through periodic reports from the QMUL Safeguarding Steering Group to Audit and Risk Committee, including this risk register. 2. Audit and Risk Committee reviews the strategic risk register quarterly and the legal compliance register annually.	President and Principal	Chief Governance Officer and University Secretary		Long-term
3	**Engagement with students and members of staff**	Students and members of staff are disengaged and unaware how to share information about vulnerable individuals.	3	3	9.0		A) The Vice-President Welfare of Queen Mary Students' Union is a member of the QMUL Safeguarding Steering Group A) Wep pages promoted through internal comms channels including those on how to report safeguarding concerns, report and support tool and student support contacts in schools. A) Prevent referrals is covered in Safeguarding Essentials mandatory training module for staff	3	2	6.0		ACTION: QMUL Safeguarding Steering Group to review effectiveness of communication	Chief Governance Officer and University Secretary; Chief Operating Officer	Director of Student Experience; Director of Human Resources; Director of Marketing and External Relations		Long-term

Training

| 4 | **Training of appropriate members of staff** | Relevant members of staff do not understand how to recognise vulnerable individuals or what action to take in response. | 3 | 3 | 9.0 | | A) Safeguarding Essentials is mandatory training course for staff and covers Prevent policy and practice, Human Resources monitor uptake
A) Additonal Prevent briefing sessions are periodically arranged via the local Prevent Coordinator. The QMUL Safeguarding Steering Group is responsible for reviewing the list of staff who need additional Prevent briefing sessions
A) The Lead Safeguarding Officer undertakes Level 3 Designated Safeguarding Officer training every 2 years | 2 | 2 | 4.0 | | ACTION: A Prevent specific online learning module for staff to be developed in 2023 | Chief Governance Officer and University Secretary; Chief Operating Officer | Director of Student Experience; Director of Human Resources; | | Long-term |

Strategic Risk Register

Reference	Risk Group	Risk Descriptor	Initial risk before any controls				Controls	Residual risk with current controls				Further Actions and Notes	Owner	Lead Officer	Strategic Objective	Term
			Impact	Likelihood	Initial Risk Score	Direction of Travel		Impact	Likelihood	Residual Risk Score	Direction of Travel					
5	Sharing information about vulnerable individuals	Procedures for sharing information internally and externally on vulnerable individuals are not present, or ineffective.	3	3	9.0		A) An internal communications strategy on the Prevent duty and local safeguarding arrangements has been implemented covering all students and members of staff. A) There is a formal link between the QMUL safeguarding network and the QMUL Channel Panel. A) QMUL has effective relationships with local police and Prevent Co-ordinators and a forum has been identified through which these institutional relationships will be maintained. A) The Safeguarding Policy and Procedure and the role descriptions of members of the safeguarding network have been revised to include explicit reference to sharing information about vulnerable individuals under the Prevent duty. A) QMUL's whistleblowing policy was reviewed in reference to the Prevent duty in November 2015. A) The Regional Prevent Co-ordinator has attended a meeting of the QMUL Channel Panel.	2	1	2.0		1. QMUL Channel Panel considers responsibilities under the Data Protect Act before sharing information externally.	Academic Registrar and Council Secretary	Director of Student Services; Director of Marketing and Communications; Assistant Director of Estates and Facilities (Residences and Events)		Long-term

Welfare, pastoral and chaplaincy support

Reference	Risk Group	Risk Descriptor	Impact	Likelihood	Initial Risk Score	Direction of Travel	Controls	Impact	Likelihood	Residual Risk Score	Direction of Travel	Further Actions and Notes	Owner	Lead Officer	Strategic Objective	Term
6	Pastoral and chaplaincy support	There may be insufficient chaplaincy and pastoral support available for all students	1	3	3.0		A) The policies for faith support were reviewed in reference to the Prevent duty in December 2015. A) There is a multi-faith facility on the Mile End campus.	1	3	3.0		1. The Church of England provides a resident chaplain at QMUL. Support for other faiths is provided through local communities.	Vice-Principal External Relations	Director of Student Experience		Long-term
7	Oversight of faith facilities	Faith facilities may be used inappropriately if there is insufficient oversight.	3	1	3.0		A) There is a protocol on use of the multi-faith facility which was updated following Prevent Duty guidance A) Student societies who use faith facilities are given support and advice on use of spaces and policies by QMSU	3	1	3.0		1. The Church of England provides a resident chaplain at QMUL. Support for other faiths is provided through local communities. 2. Students wishing to use the multi-faith facility must visit the Mile End or Whitechapel campuses to do so.	Vice-Principal External Relations	Director of Student Experience; President of Queen Mary Students' Union		Long-term

External speakers and events

Reference	Risk Group	Risk Descriptor	Impact	Likelihood	Initial Risk Score	Direction of Travel	Controls	Impact	Likelihood	Residual Risk Score	Direction of Travel	Further Actions and Notes	Owner	Lead Officer	Strategic Objective	Term
8	Policies and procedures for approving external speakers and events on campus	Students may become radicalised through exposure to extremist views and ideologies on campus.	4	1	4.0		A) The relevant policies and procedures of both QMUL and Queen Mary Students' Union have been updated in reference to the Prevent duty and are aligned with each other. The policies apply to all students and members of staff. A) Relevant staff have completed Prevent training. A) Prevent Lead has relationship with local Prevent officers in Tower Hamlets and London with regular briefings about local risks provided to the university	4	1	4.0		1. Data on external speaker bookings is monitored and reported to Senior Executive Team and Audit and Risk Committee via the annual Prevent return 2. Policies and procedures are reviewed and updated by the Safeguarding Steering Group where issues are identified.	President and Principal	Assistant Director of Estates and Facilities (Residences and Events); Director of Student Experience; Chief Executive and President of Queen Mary Students' Union		Long-term
9	Policies and procedures for ensuring freedom of speech and academic freedom	QMUL may not continue to foster freedom of speech within the law.	4	1	4.0		A) The terms of reference of Senate give it responsibility to approve policies to support and foster academic freedom in relation to the academic activity of QMUL and to report to Council on matters of concern. A) Senate has debated the issue of freedom of speech and academic freedom in reference to the Prevent duty. A) QMUL's policies and procedures on research ethics have been expanded with further information about existing practices for approving security-sensitive and extremism-related research. A) The Freedom of Speech Policy has been reviewed in light of the Prevent duty.	4	1	4.0		1. The potential risk to QMUL's reputation is reported below. ACTION: Review pending outcome of Shawcross Review of Prevent Duty	President and Principal; Vice-Principal Education	Director of Student Experience; Assistant Director of Estates and Facilities (Residences and Events); Executive Officer to the Principal; Chief Executive of Queen Mary Students' Union; Chair of Ethics of Research Board		Long-term
10	Policies and procedures for approving branded events taking place off campus	Students may become radicalised through exposure to extremist views and ideologies at QMUL branded events taking place off campus.	4	1	4.0		A) The relevant policies and procedures of both QMUL and Queen Mary Students' Union have been updated in reference to the Prevent duty and are aligned with each other. The policies apply to all students and members of staff.	4	1	4.0		1. The updated approach has enhanced the already successful oversight of visits by external speakers and events on campus.	President and Principal	Assistant Director of Estates and Facilities (Residences and Events); President and Chief Executive of Queen Mary Students' Union		Long-term

Internet safety

Reference	Risk Group	Risk Descriptor	Impact	Likelihood	Initial Risk Score	Direction of Travel	Controls	Impact	Likelihood	Residual Risk Score	Direction of Travel	Further Actions and Notes	Owner	Lead Officer	Strategic Objective	Term
11	Policies on the use of IT facilities	Students or members of staff may use QMUL's IT facilities to access or share harmful content.	3	2	6.0		A) QMUL's policies on the use of IT facilities have been revised to make explicit reference to the Prevent duty. A) QMUL's policies and procedures on research ethics have been expanded with further information about existing practices for approving security-sensitive and extremism-related research.	3	2	6.0		1. The potential risk arising from the actions of individual students and members of staff is reported below.	Director of IT Services	Head of IT Security		Long-term

Strategic Risk Register

Reference	Risk Group	Risk Descriptor	Initial risk before any controls				Controls	Residual risk with current controls				Further Actions and Notes	Owner	Lead Officer	Strategic Objective	Term
			Impact	Likelihood	Initial Risk Score	Direction of Travel		Impact	Likelihood	Residual Risk Score	Direction of Travel					
12	Internet filtering	Students or members of staff may use QMUL's IT facilities to access or share harmful content.	3	2	6.0		A) Queen Mary Senior Executive has reviewed QMUL's position on internet filtering A) QMUL's policies and procedures on research ethics have been expanded with further information about existing practices for approving security-sensitive and extremism-related research.	3	2	6.0		Information Security and Acceptable Use Policy , Code of Student Discipline, Staff Discipline Policy all deal with this issue	Director of IT Services	Head of IT Security		Long-term

Reputation and brand

Reference	Risk Group	Risk Descriptor	Impact	Likelihood	Initial Risk Score	Direction of Travel	Controls	Impact	Likelihood	Residual Risk Score	Direction of Travel	Further Actions and Notes	Owner	Lead Officer	Strategic Objective	Term
14	Publicity arising from the actions of individual students and members of staff	A student or member of staff may attract negative press scrutiny in the context of the Prevent Strategy.	4	1	4.0		A) QMUL Press Office releases briefings on QMUL's Freedom of Speech Policy and procedures for approving external speakers and events. A) QMUL Press Office offers support to students and members of staff who attract attention from the press.	4	1	4.0		1. The impact is dependent on the context and is not therefore necessarily reduced by the controls specified.	President and Principal	Director of Marketing and Communications		Long-term

NB Shaded columns are reported to Audit and Risk Committee and Council

Strategic IOP	The IOPs identified in the College's Strategic Plan	
Term	The period in which the risk is likely to occur:	
Short	Up to 2 years	
Medium	Likely to continue for 2 to 5 years	
Long	Lasting more than 5 years	
	Enduring risks, which are likely to continue indefinitely, should be expressed as Long Term.	
Impact	The effect of the risk occurring:	
1	**Negligible**	
2	**Minor**	
3	**Moderate**	See Guidance page.
4	**Major**	
5	**Catastrophic**	
Likelihood	How likely it is that a risk will occur:	
1	**Rare**	2% likely to happen: a one in fifty chance
2	**Unlikely**	5% likely to happen: a one in twenty chance
3	**Possible**	10% likely to happen: a one in ten chance
4	**Likely**	20% likely to happen: a one in five chance
5	**Almost Certain**	50% or over: a one in two chance or more likely to happen than not
Controls in Place	Indicates whether the Controls in place have:	
A	been implemented and are operating effectively	
B	been identified and are being implemented	
C	not yet been identified or are incomplete	
Direction of Travel	Whether the situation has changed and in what way:	
New or N/A	New item	**N.B. This may be a newly identified risk, as opposed to a new actual risk.**
↑	Indicates a worsening position	
↔	Indicates an unchanged position	
↓	Indicates an improving position	
Number of risks listed	**11**	
Number of Moderate risks	**0**	
Number of 'High' risks	**0**	