Prevent Risk Assessment/Action Plan

Assessment undertaken by College Prevent Leads	Rachel Nicholls Vice Principal Curriculum & Quality New College Stamford Drift Road Stamford PE9 1XA 01780 484300 Paula David Director of Learning, Development & Welfare New College Stamford Drift Road Stamford PE9 1XA 01780 484300
Internal/External Verification/approval	Internal: Safeguarding and Equality & Diversity Committee/Executive Leadership Team External: Sam Slack (PREVENT Co-ordinator)
Date Undertaken	November 2017
Next Annual review	January 2018

Who is this document for?
This document is intended for College leaders, managers and governors; the intention of this document is to give advice, reassurance and guidance on how *Prevent* is being implemented within New College Stamford.

It will provide a framework on how to assess and deal with Prevent vulnerabilities at the College and to have due regard to the need to prevent people being drawn into terrorism.

A. Background to Prevent

The revised Prevent Strategy was launched in June 2011 and is an integral part of the Counter Terrorism Strategy. Its aim is to stop people becoming drawn into, promoting or supporting terrorism. Prevent will address all forms of terrorism but continue to prioritise according to the threat they pose to our national security. Preventing terrorism will mean challenging extremism (and non-violent) ideas that are also part of a terrorist's ideology. Prevent will also mean intervening to try to stop people moving from extremist groups or extremism into terrorist-related activity.

The three Prevent Objectives are:

Respond to the ideological challenge of terrorism and the threat we face from those who promote it:
– Using teaching and learning to help students and staff to develop the knowledge and skills to challenge extremist narratives.

Prevent people from being drawn into terrorism and ensure that they are given appropriate advice and support:
– Identifying how to prevent harm to students by individuals, groups or others who promote terrorism and violent extremism.
– Robust safeguarding procedures to intervene and support any student who is at risk.

Supporting sectors and institutions where there are risks of radicalisation:
– Increasing the resilience of college communities by encouraging engagement with management, staff and students through training and awareness raising.
– Encouraging the training of staff and the use of curriculum opportunities with students which allow grievances to be aired and dealt with.
– Ensuring that college resources are not used by extremist groups.

B. How can the Further Education sector help?

The Counter Terrorism and Security Bill has placed the Prevent element of the national counter terrorism strategy on a **statutory footing**. This has implications for colleges and partner agencies and bodies, such as schools, universities and councils. Further Prevent Duty Guidance was issued in July 2015.

Colleges promote and facilitate the exchange of opinions and ideas, and enable debate as well as learning. The Government has stated that it has no wish to limit or otherwise interfere with this free flow of ideas, and that it will be careful to balance the need to preserve national security with protecting civil liberties. Although it is vital that colleges must protect academic freedom,

it is a long-established principle that colleges also have a duty of care to their students. Colleges, college societies and student groups have a clear and unambiguous role to play in helping to safeguard vulnerable young people from radicalisation and recruitment by terrorist organisations.

We accept that New College Stamford can play an important part in preventing terrorism. Just as we can help to educate people about risk, we offer opportunities to help learners understand the risks associated with extremism and help develop the knowledge and skills to be able to challenge terrorist ideologies.

Staff in this College, working in partnership with other local agencies, are well placed to identify needs and support the welfare of individual students who may be particularly vulnerable.

C.   Who is responsible for pursuing terrorists?

There are other elements within the Government's counter terrorism strategy which focus on pursuing and disrupting terrorists. This is not the role of 'Prevent', which operates in what is called the 'non-criminal space' similar to other preventative initiatives that protect and safeguard vulnerable individuals at risk of being drawn into harms such as drugs, gang culture and gun and knife crime.

D.   What support is available for people at risk of becoming involved in extremism?

Channel is a joint initiative that offers help and guidance to people who may be at risk of becoming involved in extremism. Extremist organisations sometimes try to recruit people who are susceptible or vulnerable, in person or through the internet. If the early signs are spotted and acted upon, it safeguards the person concerned and helps protect all of us who live and work in the town. The College is represented on the Channel Board and the local Prevent Group.

Concerns that an individual may be vulnerable to radicalisation (grooming) does not mean that we think the person is a terrorist; it means that we are concerned that they are prone to being exploited by others.

It is important too that staff trust their professional judgement – if they are concerned that someone is at risk of getting involved in extremism, they should in the first instance contact the Safeguarding Team at the College who should, if required, contact their Channel Co-ordinator. They will, in partnership with other safeguarding professionals, investigate further to assess the nature and extent of the risk and the Channel Panel will develop the most appropriate support package for the individual concerned.

www.stamford.ac.uk
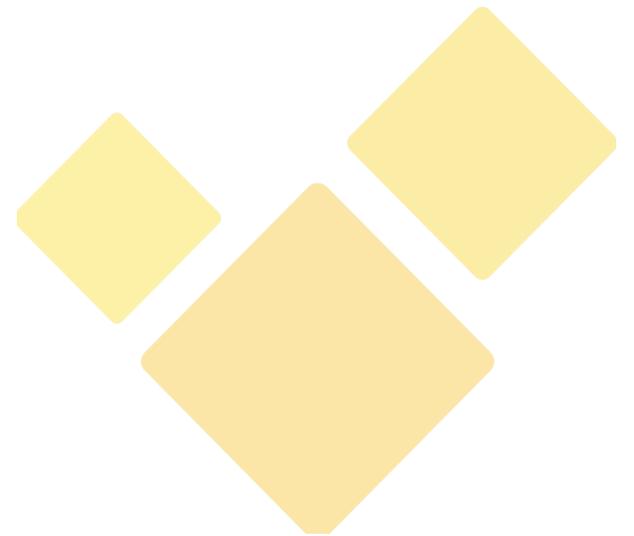
E.   What training is available?

WRAP 3 Training is available for staff whose work may bring into contact with people who may be vulnerable to becoming involved in extremism. The workshop is an introduction to Prevent and covers issues such as crime, normal social processes that are used to influence and manipulate, extreme right-wing and Al Qa'ida case studies, terrorist ideologies and factors which may contribute to an individual's susceptibility to a terrorist ideology.

This workshop provides attendees with:
- An awareness and understanding of the Prevent agenda and their role within it
- The ability to use existing expertise and professional judgement to recognise potentially vulnerable individuals who may be susceptible to messages of violence
- The confidence to use a common sense based response to support and intervene with vulnerable people.
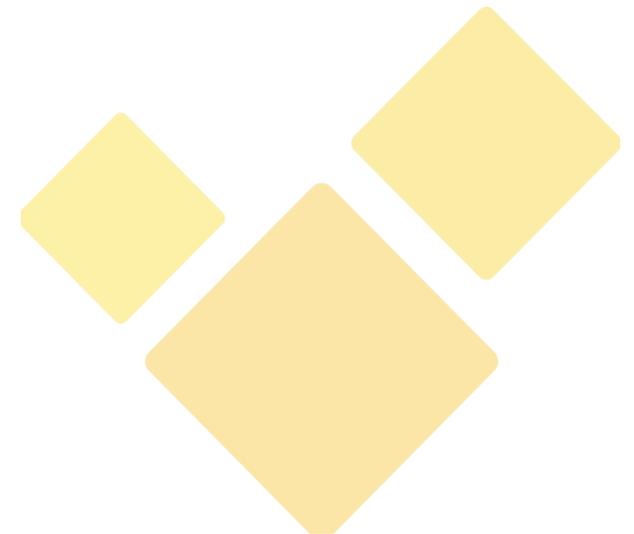
Prevent Risk January 2017

Review Date:

Risk Scoring Matrix

Impact	Probability				
	1 – Rare	2 – Unlikely	3 – Possible	4 – Likely	5 – Almost Certain
5 – Extreme	5	10	15	20	25
4 – Major	4	8	12	16	20
3 – Moderate	3	6	9	12	15
2 – Minor	2	4	6	8	10
1 - Insignificant	1	2	3	4	5

Rag Ratings
🔴 Limited / No Progress
🟠 On Track / on-going as planned
🟢 Completed

No	Vulnerability/Risk Area	Probability	Impact	Risk Scoring	Action taken/already in place to mitigate/address risk	Responsibility	Timescale	Progress RAG Rating 🔴🟠🟢	Commentary
1	**Leadership** Insufficient understanding of their own and institutional responsibilities in relation to the "Prevent Duty". • Corporation • Senior Leadership Team (SLT) • Staff • Student Council • Safeguarding Team	1	3	3 **Very low**	Corporation received Safeguarding Training (Prevent is part of the College Safeguarding umbrella) November 2016. Annual safeguarding report and assessment of Single Equalities Scheme, Report and Equality Action Plan which goes to Corporation. IN addition, safeguarding action plan and Prevent Risk Assessment / action plan are monitored by Safeguarding Governor and Corporation. Key staff WRAP 2/3 trained. Update Safeguarding Training delivered at staff development week/day July 16	HROD Clerk to Corporation VPCQ HROD	Ongoing Ongoing Nov 2016	🟢 🟢 🟢	

www.stamford.ac.uk

No	Vulnerability/Risk Area	Probability	Impact	Risk Scoring	Action taken/already in place to mitigate/address risk	Responsibility	Timescale	Progress RAG Rating 🔴🟠🟢	Commentary
					and Oct 16.				
					Student Union Officers (once elected) to be Safeguarding/Prevent trained.	DoL D&W	Feb 2017	🟠	
					All staff undertake online Prevent training.	HROD	Ongoing	🟢	
					Prevent training session for Apprentices.	Apprenticeship Manager	Feb 2017	🟠	
2	**Partnership** a) Ineffective engagement from the College Corporation, SLT, managers and leaders.	1	3	3 **Very low**	a) Corporation & SLT provided with updates. Other managers and leaders completed WRAP 2/3 training – all aware of CT Bill and Duty.	VPCQ	June 2015 and ongoing	🟢	
	b) Single point of contact (SPOC) not known or identified in relation to Prevent.	1	3	3 Very low	b) The Prevent Lead for NCS is the VPCQ. She is responsible for oversight of the Prevent Risk Assessment Plan and update, to SLT and Governors.	VPCQ	Ongoing	🟢	
	c) Insufficient and ineffective engagement with the BIS Regional Prevent Coordinator, Local Authority Police Prevent Leads and engagement with local Prevent Boards/Steering Groups at Strategic and Operational Level.	1	3	3 **Very low**	c) The VPCQ and DoL D&W meet regularly with the FE Prevent Coordinator and Lincolnshire Prevent Coordinator. They are a member of the local FE Prevent Board. The VPCQ and DoL D&W are familiar with both Local Authority and Police Prevent Leads. VPCQ & DoL D&W attending Table Top exercise in March 2017 coordinated by FE Prevent Coordinator and Police Lead.	VPCQ & DoL D&W	Ongoing	🟢	

www.stamford.ac.uk

No	Vulnerability/Risk Area	Probability	Impact	Risk Scoring	Action taken/already in place to mitigate/address risk	Responsibility	Timescale	Progress RAG Rating 🔴🟡🟢	Commentary
3	**Staff Training** Insufficient staff knowledge and confidence to: a) Exemplify British Values in their management, teaching and through general behaviours in the institution.	3	2	6 Low	a) All teaching staff have received training on British Values and how to embed/develop naturally, July and Oct 2016. College Values reflect British Values around respect, support, friendly and strong sense of community. Student behaviour is good and behavior management is excellent.	DoQ	Ongoing	🟢	
	b) Understand the factors that make people vulnerable to being drawn into terrorism and to challenge extremist ideas which are used by terrorist groups and can purport to legitimize terrorism.	2	4	8 Medium	b) Information documents (Safeguarding For All Policy) shared with all staff outline this. WRAP 3 Training in July 2016 underlined the complexities involved. Staff are clear that they must refer any concerns using the Safeguarding Referral form. Area will remain flagged as 'Amber' as it is a constantly evolving landscape and requires continued vigilance.	VPCQ DoL D&W	Ongoing	🟡	
	c) Insufficient training to be able to recognise this vulnerability and be aware of what action to take in response.	3	4	12 Medium	c) Training in July 2016 underlined the complexities involved. Safeguarding For All Policy and referral form outlines some of the indicators for staff to be aware of. Area will remain flagged as 'Amber' as it is a constantly evolving landscape and requires continued vigilance.	VPCQ DoL D&W	Ongoing	🟡	
					Teaching & Learning Coaches work with all new staff on	DoQ/TLCs	Ongoing	🟡	

No	Vulnerability/Risk Area	Probability	Impact	Risk Scoring	Action taken/already in place to mitigate/address risk	Responsibility	Timescale	Progress RAG Rating 🔴🟡🟢	Commentary
					commencement of post and promotion of British Values is part of the Training & Development programme.				
4	**Welfare and Tutorial Support** a) Inadequate arrangements and resources in place to provide pastoral care and welfare support as required by the College.	1	4	4 **Low**	a) Trained and updated Student Advisors and Safeguarding/Welfare Team. E-safety tips for students including online training packages being explored. Attendance Officer in place to quickly respond to issues including medium/long term absences that may require a home visit. Passport Plus develops awareness of British Values, keeping yourself safe and online safety.	DoL D&W	Sept 2016	🟢	Safer Internet Day 7 Feb 2017.
	b) Insufficient checks on chaplaincy provision and how this contributes to the Colleges student support services.	1	1	1 **Very low**	b) Chaplaincy provision is provided and is part of the Student Engagement Team, monitored by DoL D&W. Annual Self-Assessment for related areas.	DoL D&W	Ongoing	🟢	
5	**Speakers and Events** a) Ineffective policy /framework for managing speaker requests.	2	3	6 **Low**	*This area will remain flagged as 'Amber' as it is a constantly evolving landscape and requires continued vigilance.* a) All speaker requests require the permission of a manger. Managers have been trained in Safeguarding and WRAP 3 and are fully aware of the risks and sensitivities involved. If in doubt,	VPCQ	Sept 2016	🟡	

www.stamford.ac.uk

No	Vulnerability/Risk Area	Probability	Impact	Risk Scoring	Action taken/already in place to mitigate/address risk	Responsibility	Timescale	Progress RAG Rating	Commentary
	b) Insufficient communicated to staff and complied with.	2	3	6 Low	they are clear that they should contact a member of the Safeguarding Team and/or a senior manager. All visitors require authorization. There is an effective Visitors Policy and all staff are aware of this. All Visiting speakers are risk assessed and forms sent to Executive office and collated. b) Is communicated at point of request. No significant issues. All visitors require authorisation. There is an effective Visitors Policy and all staff are aware of this.	Executive Office	Sept 2016	🟢	
6	**Safety On-line** a) Insufficient and ineffective policy relating to the use of IT which doesn't contain a specific reference and inclusion of the Prevent Duty.	1	4	4 Low	a) Policy is accepted every time user logs on. Policy specifically references Prevent. Student received information related to IT at Induction and Speed Dating session.	DoIT & Resources	Ongoing	🟢	
	b) Ineffective filtering/firewall systems to prevent staff/students/visitors from accessing extremist websites and material.	1	4	4 Low	b) NCS has purchased E-Safe as a firewall, web filter and key stroke filter. E-Safe is a highly advanced product and also the College pays for their triage service.	DoIT & Resources	Ongoing	🟢	
	Insufficient coverage of the use of using their own devices via Wi-Fi.	1	4	4 Low	c) Web filtering software applies. d) NCS has purchased E-Safe. All breaches are triaged by E-Safe	DofIT & Resources	Ongoing	🟢	

No	Vulnerability/Risk Area	Probability	Impact	Risk Scoring	Action taken/already in place to mitigate/address risk	Responsibility	Timescale	Progress RAG Rating 🔴🟡🟢	Commentary
	c) Failure to alert to serious and/or repeated breaches or attempted breaches of the policy.	1	4	4 **Low**	and College is notified of any unacceptable use, safeguarding concerns or Prevent related concerns. Safeguarding Team are notified and are able to respond immediately.	Safeguarding Team	Ongoing	🟢	
7	**Prayer and Faith Facilities** a) Inadequate management procedures of the College prayer facilities.	2	3	6 **Low**	a) Multi-Faith Room provided for all faiths and those with no faith. Expectations for usage clearly displayed/published. Policy for Contemplation Room in operation.	DoL D&W	Ongoing	🟢	
					Meetings and religious teaching are not allowed within the prayer space. Safeguarding & Welfare staff ensure no denomination is able to dominate the space. This is monitored including random drop-ins by the Safeguarding & Welfare Team and/or Campus Coordinators.	DoL D&W	Ongoing	🟢	
8	**Site Security** a) Ineffective arrangements in place to manage access to the site by visitors and non-students /staff.	3	4	12 **Medium**	a) Reception staff trained. Duty Manager rota in place.	DoL D&W	Ongoing	🟢	
					All visitors have to sign in at Reception. Frequent Visitors undertake DBS through application process.	HROD	Ongoing	🟢	
					All contractors are collected and met, badges issued by Estates.	DofIT & Resources	Ongoing	🟢	
	b) Ineffective policy regarding the wearing of ID on site, which is not enforced.	3	4	12 **Medium**	b) All visitors required to display ID. Staff /students expected to wear ID – is part of the Code of Conduct and staff/	SLT	Ongoing	🟢	

No	Vulnerability/Risk Area	Probability	Impact	Risk Scoring	Action taken/already in place to mitigate/address risk	Responsibility	Timescale	Progress RAG Rating 🔴🟡🟢	Commentary
	c) Ineffective arrangements for the storage of dangerous substances on site.	1	4	4 **Low**	students/visitors are subject to routine checks by Duty Managers and Campus & Community Officers. c) There are effective measures in place to ensure that appropriate security and health and safety procedures are followed.	DofIT & Resources	Ongoing	🟢	
	d) Insufficient external hire policy which complies with Prevent Duty.	2	4	8 **Medium**	d) Policy has been developed – Conditions for External Hire of College Premises. All external hire approved and processed by Director of IT & Resources.	DofIT& Resources	Sept 2016	🟢	
9	**Safeguarding** a) Insufficient attention paid to the protection against the risk of radicalisation and extremism which is not included within Safeguarding and other relevant policies.	1	3	3 **Very low**	a) Explicit in policy and information. Presented to and approved by Corporation.	VPCQ	Annually	🟢	
	b) Safeguarding and Welfare staff do not receive additional and ongoing training to enable the effective understanding and handling of referrals relating to radicalisation and extremism.	1	4	4 **Very low**	b) Most recent refresher Safeguarding training took place in October 2016. All of Safeguarding and Welfare team fully briefed and well trained.	DoL D&W	Oct 2016	🟢	
	c) The College does not utilise Channel as a support mechanism in cases of radicalisation and extremism.	1	4	4 **Very low**	c) Have referred one individual to Channel but following advice not progressed by Channel Team.	DoL D&W	Ongoing	🟢	
	d) The College is not easily able to refer cases to Channel.	1	4	4 **Very low**	d) The College has very good communication links with Channel and Prevent staff. The College is	DoL D&W Safeguarding Team	Ongoing	🟢	

No	Vulnerability/Risk Area	Probability	Impact	Risk Scoring	Action taken/already in place to mitigate/address risk	Responsibility	Timescale	Progress RAG Rating 🔴🟠🟢	Commentary
	familiar with the referral process.								
	e) Safeguarding/Prevent concerns are note effectively logged and monitored.	1	4	4 **Very low**	e) ProMonitor is used to log all Safeguarding concerns, following the completion of the Safeguarding referral form. This enables data analysis and effective communication. Referral form and ProMonitor categorisation includes reference to at risk of radicalisation and/or extremism.	DoL D&W	Sept 2016	🟢	
10	**Communication** a) The College Prevent Lead and their role is not widely known across the institution.	1	4	4 **Very low**	a) Safeguarding Team known, which includes the DSM and 3 experienced staff including VPCQ.	VPCQ DoL D&W	Ongoing	🟢	
	b) Staff and students are not made aware of the Prevent Duty, current risks and appropriate activities in this area.	2	3	6 **Very low**	b) All updated materials published and staff directed to them on Staff Intranet. July-Oct training promoted this further.	DoL D&W VPCQ	July 2016 and Oct 2016	🟢	
	c) Information sharing protocols are not in place to facilitate information sharing with Prevent partners.	3	4	12 **Medium**	c) No issues in the College sharing information with Channel or the Police. These are recorded and responded to quickly by senior staff. Regular meetings with the Prevent Coordinator at the College. College represented on the Prevent FE Group.	DoL D&W VPCQ	Sept 2016	🟢	
11	**Incident Management** a) Ineffective critical incident management plan which is insufficient in dealing with terrorist related issues.	1	5	5 **Very low**	a) Disaster Management Plan has been updated and refers to bomb threat/ rogue attack.	SLT	Ongoing	🟢	
	b) Insufficient training and informed	2	5	10	b) This would include a single point	Principal	Ongoing	🟢	

No	Vulnerability/Risk Area	Probability	Impact	Risk Scoring	Action taken/already in place to mitigate/address risk	Responsibility	Timescale	Progress RAG Rating 🔴🟡🟢	Commentary
	personnel identified to lead on the response to such an incident.			**Low**	of contact (normally the Principal) who has been trained in dealing with the media. VPCQ & DoL D&W attending Table Top exercise in March 2017 coordinated by FE Prevent Coordinator and Police Lead.				
	c) Failure to understand the nature of such an incident and the response that may be required in terms of the media.	2	5	**10 Very low**	c) Marketing team is managed by the VPCQ. In the event of an incident, advice to be taken from the Police and FE Prevent Coordinators.	VPCQ	Ongoing	🟢	
12	**Employers and Partners** a) Insufficient strategies to ensure that Apprentices, Trainees and employees have an understanding and comply with the Prevent Duty.	3	3	**9 Medium**	a) Prevent requirements and expectations added to Employer and Apprentice Handbooks which have been distributed to all employers and apprentices.	APPS	Nov 2016	🟢	
					ILP signed by all apprentices and employers.	APPs	Nov 2016	🟢	
					Subcontracting Policy directly refers to Prevent Duty.	APPS	Nov 2016	🟢	
					Subcontracting contracts reference Safeguarding and Prevent expectations.	APPS	Nov 2016	🟢	
	b) Insufficient checks by the College to ensure that we do not inadvertently promote or fund terrorism and extremism.	1	5	**5 Very low**	b) Appropriate due diligence and audits carried out.	APPS Financial Controller	Ongoing	🟢	

www.stamford.ac.uk

No	Vulnerability/Risk Area	Probability	Impact	Risk Scoring	Action taken/already in place to mitigate/address risk	Responsibility	Timescale	Progress RAG Rating 🔴🟡🟢	Commentary
13	**Human Resources** a) Failure of the College to update the Whistleblowing Procedure which references Prevent.	1	3	3 **Very low**	a) Whistleblowing Procedure updated.	HROD	Sept 2016	🟢	
	b) Insufficient safer recruitment processes which are not robust.	1	4	4 **Low**	b) Robust checking process for all staff and governors. DBS compliant. Single Central Record audited.	HROD	Ongoing	🟢	
					All managers complete Safeguarding & Safer Recruitment online ETF Training.	HROD	Ongoing	🟢	
					Safeguarding question forms part of every interview process.	HROD	Ongoing	🟢	

Definitions
- An ideology is a set of beliefs.
- Radicalisation is the process by which a person comes to support terrorism and forms of extremism leading to terrorism.
- Safeguarding is the process of protecting vulnerable people, whether from crime, other forms of abuse or from being drawn into terrorism-related activity.
- Terrorism is an action that endangers or causes serious violence, damage or disruption and is intended to influence the Government or to intimidate the public and is made with the intention of advancing a Political, religious or ideological cause.
- Vulnerability describes factors and characteristics associated with being susceptible to radicalisation.
- Extremism is vocal or active opposition to fundamental British Values, including democracy, the rule of Law, individual liberty and mutual respect and tolerance of different faiths and beliefs. Calls for the death of British armed forces is also included.

www.stamford.ac.uk