

DCG
Prevent Risk Register & Action Plan 2021-2022
(Informed by the Derby City/Derbyshire Counter Terrorism Local Profile & FE/HE Derby City Prevent Coordinator)

Risk Scoring

Likelihood		Severity	
Almost Certain	5	Catastrophic	5
Very Likely	4	Major	4
Likely	3	Moderate	3
Unlikely	2	Minor	2
Improbable	1	None or Trivial	1

Risk Levels

HIGH RISK	12 >
MEDIUM RISK	7 - 11
LOW RISK	6 <

Current Terror Threat Level

SUBSTANTIAL - A terrorist attack on the UK mainland is likely

All risk scoring will take account of the current terror threat level

No	Risk Title	Summary	Gross Score	Existing Controls	Residual Score	Prevent Action Plan – what/when/who/how	Progress
1	Online Safety	<p>A) Extremist organisations are able to share extremist materials& views online to radicalise students and encourage them to commit acts of violence or incite others to do so.</p> <p>B) Students (and staff) are able to access unlawful &/or radicalising material which promotes proscribed terrorist groups.</p> <p>C) The CTLP & police risk briefings identify that virtually all cases of radicalisation referred for support have an identified element of online/internet facilitation evidencing the significant risk posed to students, staff & the organisation.</p> <p>D) During the 2020/21 COVID health crisis extremist activity (of all types) has increased significantly &</p>	<p>4 x 5 =20</p> <p>High</p>	<ul style="list-style-type: none"> DFE Prevent Coordinator and Director of IT have reviewed IT and Online safety policy and procedures to ensure Prevent duties are referenced and adhered to - this is in place Online safety mandatory training in place for all employees as part of mandatory training programme Online safety forms part of the new starter induction Programme of online safety activities undertaken by students as part of induction and tutorial programme Web filtering is in place and a scheduled report has been developed to show any terrorism or radicalisation activity that falls into the extremist category Weekly web reports sent to Director of Services for Students to identify areas of concern – reports show student access and number of hits to potentially inappropriate websites 	<p>3 x 5 =15</p> <p>High</p>	<p>Ongoing - Ensure web filtering system is current via proscribed group/extremist narrative updates via Prevent Steering Group/DfE FE Prevent Lead.</p> <ul style="list-style-type: none"> DFE Prevent lead to provide current key words document – send to IT to update web filtering system. <p>Action completed – key words document sent to HJ on 13/09/2021</p> <p>Deputy DSL, GH to attend 'Prevent Hot Topics Workshop for FE Skills - Online Safety, Managing controversial conversations & Personal resilience & wellbeing on 28/09/2021. GH to share key messages and resources post event with relevant teams.</p>	

No	Risk Title	Summary	Gross Score	Existing Controls	Residual Score	Prevent Action Plan – what/when/who/how	Progress
		the likelihood of students (& staff) being subject to extremist & radicalising material has increased. With students (& staff) isolated for lengthy periods & much of the engagement being remote this has made effective support harder & increased the likelihood of students being affected.		<ul style="list-style-type: none"> DfE Prevent Coordinator regularly provides an updated list of web filtering key words so blocking system is responsive to current narrative. Established vetting system in place regarding external speaker materials Safeguarding Guidance for Remote Teaching and Learning added to the Safeguarding Policy October 2020 update 			
2	Partnership	<p>The organisation does not establish effective partnerships with organisations such as the Local Authority, Police Prevent Team, DfE Regional Coordinator and others.</p> <p>The result is that the organisation is not fully appraised of national and local risks and does not have access to developing good practice advice or supportive peer networks.</p>	<p>4 x 4 =16</p> <p>High</p>	<ul style="list-style-type: none"> The Director of Services for Students, HJ is a member of the Derby City Prevent Steering Group, a multi-agency partnership. Membership of this group commenced in 2011. HJs role is to represent FE colleges and contribute to the Derby City Prevent Action Plan. The College meets regularly with the DfE FE/HE Prevent Lead who is also member of the Derby City Prevent Steering Group. The College Prevent Lead is familiar with both Local Authority and Police Prevent Leads and makes use of these leads for risk and threat updates, guidance and advice and for Channel referrals Director of Services for Students contributes to the Counter Terrorism Local Profile report in partnership with steering group partners Director of Services for Students established European partnerships with a visit the Netherlands in May 2017 to share good practice with European partners as part of an Erasmus project. Director of Services for Students is a member of the East Midlands FE Prevent Group who meet on a termly basis. Director of Services for Students is a member of the Derby Education Hub, which is a subgroup of the DDSP and has representation from all areas of education within the City Regular Prevent Updates by the Prevent Coordinator/Community Cohesion, Derby City Council team to safeguarding officers DSL & Deputy DSL attend the annual Prevent East Midlands multi agency conference DCG contributes annually to the Derby city/Derbyshire Counter Terrorism Local Profile. Prevent action plan reviewed to ensure priorities link to local profile. 	<p>1x4=4</p> <p>Low</p>	<p>Director of Student Services to attend CTLP multi agency workshop on 14/09/2021 to contribute FE view in CTLP.</p> <p>Action Completed on 14/09/2021</p> <p>Director of Services for Students to complete online CTLP survey on behalf of DCG</p> <p>Action Completed on 14/09/2021</p>	
3	Leadership	<p>Leaders within the organisation do not understand the requirements of the Prevent Statutory Duty or the risks faced by the organisation and the Duty is not managed or enabled at a sufficiently senior level.</p> <p>The result is that the organisation does not attach sufficient priority to Prevent Action plans (or does not</p>	<p>3 x 4 =12</p> <p>High</p>	<ul style="list-style-type: none"> The Prevent Lead for DCG is the Director of Services for Students, and the College's Designated Safeguarding Lead who is responsible for the development and oversight of the Prevent Risk Register and Action Plan and updates to SLT The Leadership Team are provided with briefings by DfE HE/FE Prevent Coordinator. 	<p>2x3=6</p> <p>Low</p>	<p>DfE Prevent lead to provide a Prevent Briefing to the Leadership Team on 23/11/2021</p> <p>Director of Services for students to share Prevent Education Officer newsletter with leadership and management team</p> <ul style="list-style-type: none"> Autumn Term newsletter circulated on 14/09/2021 	

No	Risk Title	Summary	Gross Score	Existing Controls	Residual Score	Prevent Action Plan – what/when/who/how	Progress
		have one) and therefore action to mitigate risks and meet the requirements of the Duty are not effective.		<ul style="list-style-type: none"> • Governor with responsibilities for Safeguarding and Prevent receives Prevent Briefing update from College Prevent Lead via SLT Safeguarding Group and monthly catch-up meetings with the DSL/Prevent Lead • Prevent risk assessment and action plan is a standing agenda item at the College’s Safeguarding Board and SLT Safeguarding Group. Updates on progress are provided • Regular Risk and Threat updates provided by Prevent lead to SLT via Safeguarding Board. • Leadership team (Director of Services for students) membership and attendance at the Derby/Derbyshire Prevent Steering Group • All employees complete the Prevent online module provided by the ETF which is part of college induction programme for new employees and then renewed every three years. 			
4	Staff training and awareness	<p>A) Staff are not aware of the factors that make people vulnerable to radicalisation and terrorism and are unable to recognise the signs of vulnerability and therefore are unable or unwilling to refer concerns.</p> <p>B) Leaders and staff feel unable or unwilling to challenge extremist narratives or exemplify British Values throughout the organisation.</p> <p>C) Staff are unclear on how to deal with or refer concerns resulting in individuals not being supported and potentially radicalisation remaining unchecked.</p> <p>D) Staff fail to complete mandated Prevent (&/or safeguarding) training.</p>	<p>5 x 5 =25</p> <p>High</p>	<ul style="list-style-type: none"> • Safeguarding Officers receive regular Prevent updates from DfE Prevent Lead/College Prevent Lead • Prevent Update articles included in the DCG safeguarding newsletter • Mandatory Prevent/Channel online training rolled out and embedded as mandatory for all support/delivery employees, managers and leaders (including subcontractors/national assessor team and Student Union) from August 2015 to date and integrated into new starter induction training package • All employees complete the Prevent online module provided by the ETF. This is part of college induction programme for new employees. Mandatory training completion monitored monthly at SLT Safeguarding Group. • Prevent reported to SLT/Governor via monthly/ Annual Safeguarding Report. • Prevent FE lead has delivered governor Prevent Briefing and X Right Wing briefing to Safeguarding Team • DCG is an active member of Derby City/Derbyshire Prevent Steering Group. This embeds links into the Channel Group and information sharing takes place with all key stakeholders • Bespoke training has been delivered by counter terrorism regional police leads/DCG safeguarding team to targeted front line employees e.g. estates, cleaners, campus operations, security, call centre, reception and student services teams. This training has included; suspect packages and bomb threat phone calls 	<p>3x5=15</p> <p>High</p>	<p>DFE Prevent Coordinator to provide a Prevent update briefing to Safeguarding Officer Team – date tbc and identified by GH</p> <p>DFE Prevent Coordinator to provide a Prevent briefing for Work Based learning assessors- date tbc and identified by MSm</p> <p>Briefing arranged for 1pm 18 November 2012</p> <p>Autumn term DCG Safeguarding employee newsletter to include Prevent update and information regarding factors that make people vulnerable, types of ideologies and new know threats eg INCEL - HJ/MB</p> <p>Prevent refresher training for estates teams to be arranged during the autumn term and delivered by Team Manager Health and Safety, LR – dates tbc</p>	

No	Risk Title	Summary	Gross Score	Existing Controls	Residual Score	Prevent Action Plan – what/when/who/how	Progress
				<ul style="list-style-type: none"> The Regional Prevent Coordinator has delivered WRAP 3 training to safeguarding officers and wider support teams Run Hide Tell training rolled out to all staff – and refresher reminders issued Session on The Dark Web delivered by Counter Terrorism police to safeguarding officers 			
5	Speakers and events	<p>A) Extremist organisations are given a platform to radicalise young people because the organisation has ineffective processes in the place for vetting speakers and events.</p> <p>B) Inappropriate or extremist materials are shared with students (face to face or via weblinks) because insufficient due diligence checks are made of external speakers and materials that they promote or share.</p> <p>C) Students (& staff) receive &/or share invitations to events (face to face or online) which may promote or involve radicalising ideas & materials</p>	<p>3 x 3 = 9</p> <p>Medium</p>	<ul style="list-style-type: none"> The duty to monitor and actively assess the risk of external speakers and events has been incorporated in the Safeguarding Policy A process and related guidance document has been produced for all those responsible for arranging events or external speakers to use in order to minimise risk A risk assessment process and database for external speakers and events has been produced and implemented Speakers have to provide the College with any presentation materials prior to delivery for vetting The risk assessment process has been communicated to all relevant managers via Team Managers Meetings, Team Meetings and with Events Team and Student Union 	<p>3x2=6</p> <p>Low</p>	<p>HJ to issue reminder to employees to undertake the risk assessment process for external visitors/speakers – September 2021</p> <p>Completed</p> <p>Risk assessment process for external speakers and events to be included in new manager induction programme - RB</p> <p>System development - move the risk assessment electronic system to an online system. <i>Timeline to be confirmed following initial planning meeting.</i> – HJ/RB</p> <p>Future action – pending review of Prevent legislation and Freedom of Speech in Higher Education Bill to review action in place regarding speakers and events.</p>	
6	Welfare & Pastoral Care	<p>A) The organisation does not provide effective welfare and pastoral support which results in students (and staff) being unsupported and the risk of vulnerabilities being exploited.</p> <p>B) Welfare & learner support is inadequately signposted or needs are not identified either early enough or often enough to allow students to access welfare/learner support.</p>	<p>3 x 3 = 9</p> <p>Medium</p>	<ul style="list-style-type: none"> The College has a range of well-established pastoral support services which include: student welfare, pastoral coaching, and information, advice and guidance services. The student eco system clearly identifies the variety of student support roles, which is shared during the induction process. The Welfare Team are based at each site and work with vulnerable students including those with mental health issues. They work in a multi-agency remit and make referrals to the integrated youth support teams in Derby City and Derbyshire County Council The College has established effective working partnerships with a range of external organisations to support students The Pastoral Coach team work closely with and complement the work of academic employees in monitoring, reviewing and checking student progress. Their primary function is to work with ‘at risk’ students Personal Tutors and Pastoral Coaches deliver tutorials and arrange enrichment activities which promote British Values, citizenship and equality of opportunity. This also embeds safeguarding and health & wellbeing and actively promotes cultural diversity 	<p>2x2=4</p> <p>Low</p>	<p>Refresh Prevent resources for induction delivery – SC (resources provided by Prevent Lead) September 2021</p> <p>Completed</p>	

No	Risk Title	Summary	Gross Score	Existing Controls	Residual Score	Prevent Action Plan – what/when/who/how	Progress
				<ul style="list-style-type: none"> The College has a trained team of Safeguarding Officers who work across the College and deal with safeguarding referrals. The team have undertaken Prevent training and receive Prevent briefings on a regular basis at Safeguarding officer meetings. Referrals in relation to Prevent are monitored on a monthly and annual basis to the Director of Services for Students/ Prevent Lead. This enables analysis of patterns and trends of students and student groups to be monitored and actions implemented to address these issues. Support services to address these issues are also monitored and agreed via the Safeguarding Board. The Diversity Calendar already promotes British Values. Curriculum and College activities over the academic year promote volunteering, inclusion, sustainability, health and wellbeing, fundraising, celebration of key festivals etc. British Values and Prevent Posters on display in classrooms/communal areas, electronic noticeboards. British Values and Prevent is promoted in the Student Online Handbook and during induction Prevent and British Values information leaflets are issued to all apprentices, work placed students and subcontracted students Workplace providers issued with British Values and Prevent information to include in NVQ portfolios Open centre Team provide drop-in sessions at each college site (NB – not recently currently due to COVID safety measures) Run, Hide Tell video included in student Induction 			
7	Prayer & Faith Facilities	<p>A) Requirements of students (or staff) requiring faith support or the use of facilities are not met by the organisation resulting in individuals seeking external support of unknown suitability.</p> <p>B) Facilities (either prayer rooms or quiet space type facilities) provided are not effectively managed or supervised and become ungoverned spaces where radicalising, inappropriate or dangerous activities can take place.</p>	2 x 4 = 8 Medium	<ul style="list-style-type: none"> Multi-faith and Reflection Rooms (or appropriate space) are provided across College sites Access and use of these areas is logged and monitored by each site reception/Estates team/Head of Campus to ensure that they are used appropriately 	2x3=6 Low	<p>To review management and monitoring responsibilities of Multi faith and Reflection Rooms following changes to staff role/locations and students returning to onsite delivery. HJ arranged a meeting on 30 September 2021 to discuss.</p> <p>Completed</p>	
8	Work based students and subcontracted provision	A) The organisation does not have robust processes in place to protect work based students and those in subcontracted provision from the risks of	3 x 3 = 9 Medium	<ul style="list-style-type: none"> Prevent and British Values embedded in work-based student induction, review and assessment process. Work Based students receive Prevent and British Values information leaflets 	3x2=6 Low	Msm to review work based induction, review and assessment process to confirm Prevent and British Values are covered sufficiently. – October 2021	

No	Risk Title	Summary	Gross Score	Existing Controls	Residual Score	Prevent Action Plan – what/when/who/how	Progress
		<p>radicalisation or views and practices contrary to British Values.</p> <p>B) Employers within work based settings are unaware of issues relating to Prevent the Statutory Duty and how to report concerns.</p>		<ul style="list-style-type: none"> Employers display Prevent and British Values posters (including how to report concerns) The Subcontractor Health Safety and Safeguarding Assessment record has been reviewed and updated to include explicit reference to the Prevent Duty Work based students are made aware that if they have any concerns they can speak to their Assessor, who will then liaise with the College's safeguarding team 		<p>Sam Slack to deliver prevent Briefing for Work Based assessors – date to be provided by MSm</p> <p>HJ to review subcontractor Safeguarding and Prevent policies requested by RE to ensure suitable arrangements are in place – November 2021</p>	
9	Promoting British Values	<p>A) The college/provider does not have a culture and ethos where British Values are celebrated, which leads to a culture of disrespect and intolerance and where extremist views & ideas are allowed to flourish.</p> <p>B) Staff and students do not understand British Values (or do not feel confident about them) and extremist views and narratives are allowed to flourish unchallenged.</p> <p>C) British Values are not embedded in the curriculum & are seen by students (& staff) as unimportant or of no value.</p>	<p>3 x 4 = 12</p> <p>High</p>	<ul style="list-style-type: none"> Promotion of BV to students via Induction, Posters and leaflets, Character Education and Enrichment programme BV embedded in standard cross College scheme of work template and tutorial scheme of work 		<p>ML to provide British Values curriculum delivery monitoring and compliance report on a half termly basis at SLT Safeguarding Group. First meeting on 24/09/2021</p>	
10	Campus Security	<p>A) The organisation does not have sufficient security of it's premises and students can be targeted by individuals or groups seeking to share their extremist views or endanger their personal safety.</p> <p>B) Charities are allowed on campus without effective checks allowing charitable collections to be inadvertently diverted to inappropriate or unlawful causes.</p> <p>C) On site dangerous or hazardous substances are not kept secure and are allowed into the possession of individuals or groups seeking to use them unlawfully.</p>	<p>3x5=15</p> <p>High</p>	<ul style="list-style-type: none"> Access control systems in place at the Roundhouse, Johnson Building, Hudson Building, JWC, Ilkeston, Broomfield Hall (Haddon, Nursery only) Gate turnstiles installed at Hudson Building following intruder incident All campuses have a security presence and CCTV 'Keeping you safe' forms part of the new starter induction and includes College security protocols and personal safety A visitor protocol is in place, together with a Control of Contractors Policy There is a policy and code of conduct regarding the wearing of ID badges which is actively enforced with students, employees and visitors The College has a Control of Substances Hazardous to Health Policy Access to hazardous substances is restricted by the use of locked storage facilities, key management systems Control of hazardous substances forms part of the health and safety inspection and audit programme Risk assessments are in place for hazardous substances brought into the College 	<p>High (BH)</p> <p>High (RH)</p> <p>High (JWC)</p> <p>Medium (Ilk/JB)</p> <p>Low (HB)</p>	<p>A Health and Safety action plan has been implemented to address security concerns following a serious incident at The Hudson Building which includes the installation of physical access barriers (now installed) – see action plan for further details. Action plan overseen by Head of Health and Safety, RB</p>	

No	Risk Title	Summary	Gross Score	Existing Controls	Residual Score	Prevent Action Plan – what/when/who/how	Progress
				<ul style="list-style-type: none"> • DCG has a COSHH database which details quantities of chemicals held within the College • The display of leaflets and posters are regulated by the Campus Operations Management team • Safeguarding protocols are implemented where off campus activities are identified as a risk to students or employees • Any work involving charities is overseen by College employees • Charities are subject to external speaker/risk assessment process. • SU promotes safer funding • Meet and Greet/Positive Behaviour Rota established which supports security on campus. 			
11.	National Terrorism Risk Level	<p>a) The organisation does not have access to terrorism & extremism risk information in each in order to understand the level of risk from either nationally or locally & is therefore unable to carry out an effective risk action or put in place mitigating actions.</p> <p>b) The organisation does not how to respond effectively to changing risk level (either in response to national or local events) to ensure that the risk assessment/action plan remains effective.</p>	<p>4 x 5=20</p> <p>High</p>	<ul style="list-style-type: none"> • The Principal/CEO has been briefed on the way in which the risk from terrorism is assessed & the current risk level via the DfE Regional Prevent Coordinator & also through local Police Prevent team. • The Police CTLP or other suitable in-person briefing or document is shared with the organisation/summarised & shared. • The Prevent Lead attends Prevent Network meetings to receive briefings & discussion with sector colleagues. • The organisation has a process/policy in place that ensures that the Prevent risk assessment/action plan is reviewed at suitable intervals, a process which is facilitated by briefing & support from the DfE Regional Prevent Coordinator. • HJ is a member of the Derby City/Derbyshire Prevent Steering Group and feeds into the CTLP and receives regular updates which are disseminated to relevant employees. • A Critical Incident/Business Continuity Plan is in place, which details key personnel with identified roles in the event of an incident occurring, including the role of the Marketing Department vis-à-vis dealing with the media • DCG has strong links with East Midlands Counter Terrorism Team and takes part in desktop/onsite exercises, linking in with key partners in the city • An alert system (Alertus) is in place on all College campuses • The Alertus App has been downloaded onto all College issued mobile phones • Mock terrorist emergency evacuation/invacuation exercises took place on 16 December2016 across all College campuses in order to test the emergency response systems. 	<p>2 x 4 = 8</p> <p>Medium</p>	<p>Prevent Risk Register and Action plan review with Helen Jefferson and Sam Slack on 10/09/21</p> <p>Completed</p> <p>Review of Prevent Risk Assessment and Action plan added as standard agenda item on half termly SLT Safeguarding Group Meeting (which includes safeguarding link governor and CEO)</p> <p>Completed</p>	

No	Risk Title	Summary	Gross Score	Existing Controls	Residual Score	Prevent Action Plan – what/when/who/how	Progress
				<ul style="list-style-type: none"> • Knife attack scenario with Counter Terrorism Police took place at JWC on 12 July 2018 • DSL team attended multi agency training day at Derbyshire Constabulary HQ to undertake tabletop Prevent scenario exercise - March 2019 • Stay Safe and Keeping you Safe is mandatory for all employees and forms part of the College new starter induction • The College has a Hostile Attack Policy which clearly documents key roles and responsibilities • Employees have undergone a programme of training commensurate with their role within the College, i.e. searching techniques, the role of the Duty Safety Officer when dealing with a hostile attack, receiving a bomb threat call 			