

## DCG

### Prevent Risk Register & Action Plan 2023-24

(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

<b>HIGH RISK</b>	<b>12 &gt;</b>
<b>MEDIUM RISK</b>	<b>7 - 11</b>
<b>LOW RISK</b>	<b>6 &lt;</b>

#### 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

<b>Risk Assessment and Action Plan Review</b>	
<u>Review Date</u>	13 November 2023
<u>Reviewers</u>	Director of Services for Students (DSL/Prevent Lead Contact) Director of Health and Safety DFE FE/HE Prevent Lead

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 &amp; 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 &amp;/or radicalising material which promotes proscribed terrorist groups.</p> <p>C. The CTLP &amp; 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 &amp; the organisation.</p>	<p>4 x 5 =20</p> <p><b>High</b></p>	<ul style="list-style-type: none"> <li>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</li> <li>Online safety mandatory training in place for all employees as part of mandatory training programme</li> <li>Online safety forms part of the new starter induction</li> <li>Programme of online safety activities undertaken by students as part of induction and tutorial programme</li> <li>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</li> <li>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</li> <li>DfE Prevent Coordinator regularly provides an updated list of web filtering key words so blocking system is responsive to current narrative.</li> <li>Established vetting system in place regarding external speaker materials</li> <li>Safeguarding Guidance for Remote Teaching and Learning included in the Safeguarding Policy</li> <li><b>FE/HE Prevent coordinator, Sam Slack delivered Prevent briefing, including online safety to deliver all staff INSET session – completed 9 Jan 2023. Further session delivered in June 2023 with apprentice assessors/trainers.</b></li> <li><b>Prevent newsletter (including online safety articles (and references to Andrew Tate) - circulated to all staff February 2023.</b></li> </ul>	<p>3 x 3 =9</p> <p><b>Medium</b></p>	<p>Undertake annual review of online Filtering and Monitoring arrangements against the <i>DFE Filtering and Monitoring Standards for Schools and colleges</i></p> <ul style="list-style-type: none"> <li><b>Action completed</b> by Director of IT/DSL/Safeguarding Link Governor (with responsibility for online safety) on 17 November 2023</li> </ul> <p>Introduce Fortinet online monitoring and reporting system which will include extremist/radicalisation categories on the new monitoring report.</p> <ul style="list-style-type: none"> <li><b>Action completed</b></li> </ul> <p><b>Spotlight on Safeguarding newsletter autumn term edition to focus on online safety</b></p> <ul style="list-style-type: none"> <li><b>Action –DSL to issue by December 2023</b></li> </ul> <p><b>Mandatory safeguarding annual refresher training will be cyberbullying/online safety module.</b></p> <ul style="list-style-type: none"> <li><b>Action completed</b> – inhouse module produced and issued via HR team</li> </ul>	
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</p>	<p>4 x 4 =16</p> <p><b>High</b></p>	<ul style="list-style-type: none"> <li>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.</li> </ul>	<p>1x4=4</p> <p><b>Low</b></p>	<p>Director of Student Services to contribute to CTLP discussion via CTLP workshop (as a member of the PLOG) hosted by Derbyshire Constabulary to provide FE perspective.</p> <p><b>Action Completed</b> on 21/09/2023</p>	

		have access to developing good practice advice or supportive peer networks.		<ul style="list-style-type: none"> <li>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</li> <li>Director of Services for Students contributes to the Counter Terrorism Local Profile report in partnership with steering group partners</li> <li>Director of Services for Students is a member of the East Midlands FE Prevent Group who meet on a termly basis.</li> <li>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</li> <li>Regular Prevent Updates by the Prevent Coordinator/Community Cohesion, Derby City Council team to safeguarding officers</li> <li>DSL &amp; Deputy DSL attend the annual Prevent East Midlands multi agency conference</li> <li>DCG contributes annually to the Derby city/Derbyshire Counter Terrorism Local Profile. Prevent action plan reviewed to ensure priorities link to local profile.</li> </ul>		<p>Director of Services for Students to complete online CTLP survey on behalf of DCG</p> <p><b>Action Completed</b> on 23/09/2023</p> <p>Director of Services for students to attend FE Prevent Regional Network Conference</p> <p><b>Action Completed</b> on 08/11/2023</p> <p>Director of Services for Students re-issued 2022/23 CTLP summary to all employees and information/resources provided by DFE Prevent Lead Contact re Israel/Hamas Conflict.</p> <p>Shared <i>Education Against Hate</i> resources with tutorial manager for inclusion in tutorial delivery.</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 have one) and therefore action to mitigate risks and meet the requirements of the Duty are not effective.</p>	<p>3 x 4 =12</p> <p><b>High</b></p>	<ul style="list-style-type: none"> <li>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</li> <li>The Leadership Team are provided with briefings by DfE HE/FE Prevent Coordinator.</li> <li>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</li> <li>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</li> <li>Regular Risk and Threat updates provided by Prevent lead to SLT via Safeguarding Board.</li> <li>Leadership team (Director of Services for Students) membership and attendance at the Derby/Derbyshire Prevent Lead Operational Group</li> </ul>	<p>2x3=6</p> <p><b>Low</b></p>	<p>DfE Prevent lead to provide annual Prevent Briefing to the leadership and management team. To continue to include update on local risk and threat – <b>date to be confirmed</b> (plan for early spring term)</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"> <li><b>Action completed</b> and ongoing.</li> </ul>

				<ul style="list-style-type: none"> <li>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.</li> </ul>			
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 (&amp;/or safeguarding) training.</p>	<p>5 x 5 =25 <b>High</b></p>	<ul style="list-style-type: none"> <li>Safeguarding Officers receive regular Prevent updates from DfE Prevent Lead/College Prevent Lead</li> <li>Prevent Update articles included in the DCG safeguarding newsletter</li> <li>Mandatory Prevent/Channel online training embedded as mandatory for all support/delivery employees, managers and leaders (including subcontractors/national assessor team and Student Union) and integrated into new starter induction training package</li> <li>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.</li> <li>Prevent reported to SLT/Governor via monthly/ Annual Safeguarding Report.</li> <li>Prevent FE lead has delivered governor Prevent Briefing and X Right Wing briefing to Safeguarding Team</li> <li>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</li> <li>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</li> <li>The Regional Prevent Coordinator has delivered WRAP 3 training to safeguarding officers and wider support teams</li> <li>Run Hide Tell training rolled out to all staff – and refresher reminders issued</li> <li>Session on The Dark Web delivered by Counter Terrorism police to safeguarding officers</li> </ul>	<p>3x2=6 <b>Low</b></p>	<p>DfE Prevent Coordinator to provide a Prevent update briefing to Safeguarding Officer Team –</p> <ul style="list-style-type: none"> <li><b>Action Completed</b> – 9 January 2023</li> </ul> <p>DfE Prevent Coordinator to provide a Prevent briefing for Work Based learning assessors-</p> <ul style="list-style-type: none"> <li><b>Action completed</b> - June 2023</li> </ul> <p>DfE Prevent Lead to provide DCG Governors with a Prevent Briefing</p> <ul style="list-style-type: none"> <li><b>Action completed</b>– completed 22 May 2023</li> </ul> <p>Briefings for summer 2024 <b>to be confirmed</b> for Governor update</p> <p>DSL/Prevent lead contact to regularly disseminate CTLP/Prevent newsletter to all employees</p> <p>Suspect packages/Prevent briefings for Caterlink/Estates and Cleaners - to be delivered by Health and Safety Manager across each site.</p>	

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 (&amp; staff) receive &amp;/or share invitations to events (face to face or online) which may promote or involve radicalising ideas &amp; materials</p>	<p>3 x 3 = 9</p> <p>Medium</p>	<ul style="list-style-type: none"> <li>The duty to monitor and actively assess the risk of external speakers and events has been incorporated in the Safeguarding Policy</li> <li>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</li> <li>A risk assessment process and database for external speakers and events has been produced and implemented</li> <li>Speakers have to provide the College with any presentation materials prior to delivery for vetting</li> <li>The risk assessment process has been communicated to all relevant managers via Team Managers Meetings, Team Meetings and with Events Team and Student Union</li> </ul>		<p>To issue reminder to employees to undertake the risk assessment process for external visitors/speakers – September 2023.</p> <ul style="list-style-type: none"> <li>Action completed</li> </ul> <p>Risk assessment process for external speakers and events is to be included in new manager induction programme.</p> <ul style="list-style-type: none"> <li>Action completed by RB</li> </ul> <p>System development for 2023/24- move the risk assessment electronic system to an online system. <i>Timeline to be confirmed following initial planning meeting.</i> – in progress DSL/Director of Health and Safety</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 &amp; 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"> <li>The College has a range of well-established pastoral support services which include: pastoral support, 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.</li> <li>The Pastoral Team are based at each site and work with vulnerable students including those with mental health issues.</li> <li>The Safeguarding team support students at risk or experiencing abuse or maltreatment. The team manage all cases in relation to Prevent. They work in a multi-agency remit and make referrals to the integrated youth support teams in Derby City and Derbyshire County Council</li> <li>The College has established effective working partnerships with a range of external organisations to support students</li> <li>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 &amp; wellbeing and actively promotes cultural diversity</li> </ul>	<p>2x2=4</p> <p>Low</p>	<p>Refresh Prevent resources for induction delivery – SC (resources provided by Prevent Lead) Completed - September 2023</p> <p>Community Safeguarding Event delivered w/c 23 September. Included Prevent Police Team and Safe and Sound. Well attended by students.</p>	

				<ul style="list-style-type: none"> <li>The safeguarding team have undertaken Prevent training and receive Prevent briefings on a regular basis at Safeguarding officer meetings.</li> <li>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.</li> <li>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.</li> <li>British Values and Prevent Posters on display in classrooms/communal areas, electronic noticeboards.</li> <li>British Values and Prevent is promoted in the Student Online Handbook and during induction</li> <li>Prevent and British Values information leaflets are issued to all apprentices, work placed students and subcontracted students</li> <li>Workplace providers issued with British Values and Prevent information to include in NVQ portfolios</li> <li>Open centre Team provide drop-in sessions at each college site (NB – not recently currently due to COVID safety measures)</li> <li>Run, Hide Tell video included in student Induction</li> </ul>			
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>	<p>2 x 4 = 8</p> <p>Medium</p>	<ul style="list-style-type: none"> <li>Multi-faith and Reflection Rooms (or appropriate space) are provided across College sites</li> <li>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</li> </ul>	<p>2x3=6</p> <p>Low</p>	<p>To review management and monitoring responsibilities of Multi faith and Reflection Rooms</p> <ul style="list-style-type: none"> <li>Action completed and confirmed at Safeguarding Board</li> </ul>	

8	Work based students and subcontracted provision	<p>A. The organisation does not have robust processes in place to protect work based students and those in subcontracted provision from the risks of 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>	<p>3 x 3 = 9</p> <p>Medium</p>	<ul style="list-style-type: none"> <li>Prevent and British Values embedded in work-based student induction, review and assessment process.</li> <li>Work Based students receive Prevent and British Values information leaflets</li> <li>Employers display Prevent and British Values posters (including how to report concerns)</li> <li>The Subcontractor Health Safety and Safeguarding Assessment record has been reviewed and updated to include explicit reference to the Prevent Duty</li> <li>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</li> </ul>	<p>3x2=6</p> <p>Low</p>	<p>Sam Slack to delivered Prevent Briefing for Work Based assessors June 2023</p> <p>Produce a new <i>Safeguarding and Wellbeing for Apprentices</i> leaflet. To include information about Prevent and British Values.</p> <ul style="list-style-type: none"> <li><b>Action Completed</b> DSL shred with assessors at INSET day on 28 June 2023. Leaflets uploaded to one file for all apprentices. Assessors to discuss with apprentices and incorporate into induction.</li> </ul>
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 &amp; 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 &amp; are seen by students (&amp; staff) as unimportant or of no value.</p>	<p>3 x 4 = 12</p> <p>High</p>	<ul style="list-style-type: none"> <li>Promotion of BV to students via Induction, Posters and leaflets, Character Education and Enrichment programme</li> <li>BV embedded in standard cross College scheme of work template and tutorial scheme of work</li> </ul>	<p>3x2=6</p> <p>Low</p>	<p><b>ML</b> to provide British Values curriculum delivery monitoring and compliance report as a standard agenda item SLT Safeguarding Group</p> <ul style="list-style-type: none"> <li><b>Action completed</b> and ongoing.</li> </ul>
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</p>	<p>3x5=15</p> <p>High</p>	<ul style="list-style-type: none"> <li>Access control systems in place at the Roundhouse, Johnson Building, Hudson Building, JWC, Ilkeston, Broomfield Hall (Haddon, Nursery only)</li> <li>External gate turnstiles installed at Hudson Building and The Roundhouse</li> <li>Internal turnstiles installed at Joseph Wright</li> <li>All campuses have a security presence and CCTV</li> <li>'Keeping you safe' forms part of the new starter induction and includes College security protocols and personal safety</li> <li>A visitor protocol is in place, together with a Control of Contractors Policy</li> </ul>	<p>Medium (BH)</p> <p>Medium (JWC)</p> <p>Medium (RH/JB/HB)</p> <p>Medium (Ilk)</p>	<p>Campus security risks are assessed and reviewed as part of the Health and Safety Risk Register</p>

		possession of individuals or groups seeking to use them unlawfully.		<ul style="list-style-type: none"> <li>• There is a policy and code of conduct regarding the wearing of ID badges which is actively enforced with students, employees and visitors</li> <li>• The College has a Control of Substances Hazardous to Health Policy</li> <li>• Access to hazardous substances is restricted by the use of locked storage facilities, key management systems</li> <li>• Control of hazardous substances forms part of the health and safety inspection and audit programme</li> <li>• Risk assessments are in place for hazardous substances brought into the College</li> <li>• DCG has a COSHH database which details quantities of chemicals held within the College</li> <li>• The display of leaflets and posters are regulated by the Campus Operations Management team</li> <li>• Safeguarding protocols are implemented where off campus activities are identified as a risk to students or employees</li> <li>• Any work involving charities is overseen by College employees</li> <li>• Charities are subject to external speaker/risk assessment process.</li> <li>• SU promotes safer funding</li> <li>• Meet and Greet/Positive Behaviour Rota established which supports security on campus.</li> </ul>			
11.	National Terrorism Risk Level	<p>a. The organisation does not have access to terrorism &amp; extremism risk information in each in order to understand the level of risk from either nationally or locally &amp; 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><b>High</b></p>	<ul style="list-style-type: none"> <li>• The Principal/CEO has been briefed on the way in which the risk from terrorism is assessed &amp; the current risk level via the DfE Regional Prevent Coordinator &amp; also through local Police Prevent team.</li> <li>• The Police CTLP or other suitable in-person briefing or document is shared with the organisation/summarised &amp; shared.</li> <li>• The Prevent Lead attends Prevent Network meetings to receive briefings &amp; discussion with sector colleagues.</li> <li>• 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 &amp; support from the DfE Regional Prevent Coordinator.</li> <li>• DSL is a member of the Derby City/Derbyshire Prevent Lead Operational Group and feeds into the CTLP and receives regular updates</li> </ul>	<p>2 x 4 = 8</p> <p><b>Medium</b></p>	<p>Prevent Risk Register and Action plan review with Helen Jefferson and Sam Slack on 13/11/23</p> <p><b>Completed</b></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><b>Completed</b></p>	

				<p>which are disseminated to relevant employees.</p> <ul style="list-style-type: none"> <li>• 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</li> <li>• 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</li> <li>• An alert system (Alertus) is in place on all College campuses</li> <li>• The Alertus App has been downloaded onto all College issued mobile phones</li> <li>• Mock terrorist emergency evacuation/invacuation exercises took place on 16 December 2016 across all College campuses in order to test the emergency response systems.</li> <li>• Knife attack scenario with Counter Terrorism Police took place at JWC on 12 July 2018</li> <li>• DSL team attended multi agency training day at Derbyshire Constabulary HQ to undertake tabletop Prevent scenario exercise - March 2019</li> <li>• Stay Safe and Keeping you Safe is mandatory for all employees and forms part of the College new starter induction</li> <li>• The College has a Hostile Attack Policy which clearly documents key roles and responsibilities</li> <li>• 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</li> </ul>			
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