

<u>Policy Title</u>	Prevent Risk Assessment: an annex to the NCG Safeguarding Policy	
<u>Policy Category</u>	Cascade	
<u>Owner</u>	Executive Director Quality	
<u>Group Executive Lead</u>	Executive Director Quality	
<u>Date Written</u>	October 2023	
<u>Considered By</u>	Safeguarding Council / Policy Review Council	
<u>Approved By</u>	Executive Board	
<u>Date Approved</u>	November 2023	
<u>Equality Impact Assessment</u>	The implementation of this policy is not considered to have a negative impact on protected characteristics	
<u>Freedom of Information</u>	This document will be publicly available through the Groups Publication Scheme.	
<u>Review Date</u>	November 2024	
<u>Policy Summary</u>	Annual update to policy to remain compliant with legislation and guidance, specifically Keeping Children safe in Education 2023 revision and Counter Terrorism. Strengthens arrangements for remote and blended delivery and cyber security and makes reference to conflict in Israel/Gaza.	
<u>Applicability of Policy</u>	<u>Consultation Undertaken</u>	<u>Applicable To</u>
Newcastle College	<u>Yes</u>	Yes
Newcastle Sixth Form	<u>Yes</u>	Yes
Carlisle College	<u>Yes</u>	Yes
Kidderminster College	<u>Yes</u>	Yes
Lewisham College	<u>Yes</u>	Yes
Southwark College	<u>Yes</u>	Yes
West Lancashire College	<u>Yes</u>	Yes
Professional Services	<u>Yes</u>	Yes
<u>Changes to Earlier Versions</u>		
<u>Previous Approval Date</u>	<u>Summarise Changes Made Here</u>	
Sep 2023 Review	Annual update to policy to remain compliant with legislation and guidance, specifically Keeping Children safe in Education 2023 revision and Counter Terrorism. Strengthens arrangements for remote and blended delivery and cyber security and makes reference to conflict in Israel/Gaza.	
Sep 2022	Additional guidance on external speakers; addition of risks associated with war in Ukraine.	
Sep 2021	Updated threat level and additional risks	
Sep 2020	Interim update with local / new risks and controls	
<u>Linked Documents</u>		
<u>Document Title</u>	<u>Relevance</u>	
NCG Safeguarding Procedure	Local arrangements for implementation of this policy within colleges.	
IT Safe Usage Policy	Makes clear the expectations for staff	
Disclosure Policy	Whistleblowing arrangements	
Admissions Policy / Recruitment Policy	Arrangements for safe recruitment of staff	

NCG Prevent Risk Assessment



Attendance Policy	Monitoring regular attendance of students
Health, Safety and Wellbeing Policy	Arrangements for keeping staff, students and visitors to the college safe and well.
EDIB Strategy / Policy	Arrangement for promoting equality of opportunity, inclusion and belonging

1. Scope and Purpose

NCG is committed to providing a safe working and learning environments for all its employees, learners, contractors, and other persons that visit the Group. This also extends to staff and learners working remotely.

These provisions apply equally to all employees of NCG including contract and agency staff irrespective of their hours worked and regardless of length of contract or service. This Risk Assessment also covers learners, contractors and visitors where appropriate as is pertinent to all college sites.

This Prevent Risk Assessment forms part of the NCG Safeguarding Policy and as such it must be read in conjunction, as themes may have inter-dependencies when dealing with risk. Likewise, internal and external referral, investigation, training, reporting processes are the same for terror-related issues, as they are for abuse and neglect, and protection from harm.

2. Definitions

The term **learner** is used in its widest sense and includes all learners, whether young people aged 14-18, learners with specific high needs, apprentices, adult learners or higher education students.

The term **teacher** is used to describe all teaching and training staff, including teachers, lecturers, instructors, skills trainers, learning support practitioners, coaches / mentors, work experience coaches and teachers in managing positions.

The term **staff** is used to refer to all teaching, training and business support staff at NCG, including any volunteers.

3. Policy Statement

Policy Standard: Staff at NCG are required to be able to identify the signs of an individual being drawn into extremism, or radicalisation, and to know how to respond immediately to any such behaviours, threats, and risks.

NCG and its constituent colleges, in accordance with the legislative requirements under the [Counter Terrorism and Security Act 2015](#), is to practically manage the risk of radicalisation, and the development of extremist views within its employees and learners.

This legal requirement has specific and implied tasks for further and higher education establishments to complete across a range of activities and structures.

The actions the Group takes to comply with the Act are also explicitly aligned to the organisational requirements for institutions under the UK Government Prevent Strategy, which is the element of the UK Counterterrorism Strategy (CONTEST) that covers prevention of extremism and radicalisation.

CONTEST is comprised of 4Ps – **Prevent, Pursue, Protect and Prepare** and relates to various stages of dealing with the prevention, risk, occurrence, and effects of terrorism, and terrorist acts.

The Prevent aspect is relevant to Further Education providers as it places specific duties on the organisation to educate, protect and respond to issues associated with extremist behaviour, radicalisation and terrorism.

Therefore, this Risk Assessment, and the overarching NCG Safeguarding Policy, are updated annually in accordance with Keeping Children Safe in Education.

3.1 Definitions

- **Radicalisation** – the process by which an individual adopts ideologies, radical or extremist beliefs
- **Extremism** – the fact that someone will hold beliefs and ideologies that are unreasonable and unacceptable, that are likely to cause division and/or harm
- **Terrorism** - a violent action that: endangers a person's life, other than that of the person committing the action; involves serious violence against a person; causes serious damage to property; creates a serious risk to the public's health and safety; interferes with or seriously disrupts an electronic system
- **Prevent** – one of the 4Ps of the UK's Counter Terrorism Strategy – CONTEST. As the name suggests it is concerned with education and early identification of a person(s) being drawn into extremism.
- **Funded Areas** – these are cities within the UK that are deemed to be at a higher risk of terrorism by government security authorities. They received additional funding, including access to DfE Prevent Coordinators for advice and guidance – London and Newcastle are two such areas in which NCG operate.
- **V2R** – Vulnerable to Radicalisation – these are general groups of learners that may be at more risk of being drawn into radicalisation by nature of their social and/or personal characteristics.

3.2 Legislative Requirements

Under Section 26 of the [Counter-Terrorism and Security Act 2015](#), the Group is a specified authority that is required to report on actions and measures that it has taken in relation to the prevention of extremism, radicalisation and terrorism.

3.3 Prevent Risk Assessment

NCG and its colleges are expected to carry out a risk assessment (see **Appendix 1**) which assesses where and how our learners or staff may be at

risk of being drawn into terrorism and extremism, and local risks extending to organized violence and crime. This includes violent, and non-violent extremism, which can create a potential atmosphere conducive to terrorism and can popularise radical views, potentially exploited by terror groups or individuals. The risks of online material have never been higher as the COVID pandemic resulted in record levels of home working and home study.

This Prevent Risk Assessment looks to core policies and systems including to ensure the safety and welfare of all learners and staff. The risk assessment also assesses the physical management of the Group including policies and procedures for external events held by staff, learners and relationships with external bodies and community groups who may use premises and online platforms.

This Risk Assessment forms part of a wider NCG Safeguarding Policy. Its existence and content is introduced to staff through mandatory eLearning and briefing through induction, and then continually promoted through annual update briefings / email circulars as to the risks to learners, staff and our communities.

Governors will be updated through periodic safeguarding reports as identified in the Board workplan, whilst leaders will maintain currency through sector briefings, local police and DfE Prevent coordinator briefings and through knowledge share at NCG's Safeguarding Council.

Promotion to learners is through induction and tutorial content, delivered by vocational, or pastoral tutors. The delivery of which is monitored through an induction checklist, whilst the impact of this training is evaluated via learner survey and evaluation of teaching and learning.

3.4 Risk Assessment Review

It is the responsibility of the NCG Executive to monitor and review this Risk Assessment, and to present any necessary changes. The Group Safeguarding Council, Group Information and Data team will also play a significant role in identifying and responding to associated risks.

This Risk Assessment is reviewed annually or in the event of any significant operational changes within the business, following a serious incident or dangerous occurrence or a change to legislation.

3.5 Misinformation and Conspiracy

Please note the following descriptions:

- **'Disinformation'** – 'Fake or misleading stories created and shared deliberately, often by a writer who might have a financial or political motive'.
- **'Misinformation'** – This also means fake or misleading stories, but in this case the stories may not have been deliberately created or shared with the intention to mislead.

- **‘Conspiracy theories’** – Conspiracy theories offer a simplifying model for all that cannot be explained or easily understood. They typically involve an ‘alternative’ explanation for an event or situation to those provided by governments and official international bodies, sometimes suggesting a group, individual or organisation is responsible or hiding information from the public. This may also include misinformation or disinformation.
- **‘Fake news’** –false information that is broadcast or published as news for fraudulent or politically motivated purposes.

Staff are required to understand the impact of this material, which can often be presented as ‘joke’ emails, videos, memes to mask the real intent. Leaders should also challenge extreme, but legal views, that may not be in line with medical, or government policy – for example anti-vax COVID rhetoric.

Whilst NCG welcomes free speech, it must be conducted in line with British Values, NCG values, and within the rule of law.

3.6 Other Topical Considerations

The Commission for Countering-Extremism (CCE) have highlighted the following prominent extremist narratives, including application to COVID where relevant.

- **Antisemitism:** Relates to hostility, prejudice and discriminations toward Jewish people. Please note the international definition of antisemitism is available here: <https://antisemitism.org/definition/>. The conflict in Israel/Gaza at the time of writing is likely to result in an increase in such hostility and staff should be aware of the risk.
- **Anti-Muslim hatred:** Relates to hostility, prejudice and discriminations toward people of Muslims or the Islamic faith.
- **Anti-Chinese hatred:** Hate crime and hate incidents towards Chinese people have reportedly risen, especially during the outbreak of COVID and its origins in China.
- **Islamist Extremism:** this relates to an advocate, supporter or participant in Islamic terrorism and extremism. It is important to note that, according to Police / Prevent briefings, Islamist extremist threats remain the most prevalent convictions in the UK at the time of writing. Extremists have used COVID-19 to support existing narratives to promote the need for a Caliphate over democratic society, claiming the pandemic is a divine punishment for the West’s ‘sinful’ behaviours.
- **Right-wing Extremism:** relates to a specific ideology that is characterized by anti-democratic opposition towards equality and strong views around immigration. It is also worth noting that a spectrum exists to define the stages of right-wing ideology – this starts at right-wing views associated with national identity and immigration, and stretches to the very ‘far right’, and views associated with white supremacy. Right-wing extremists have exploited the pandemic to amplify the weakness and hypocrisy of democratic values like tolerance and freedom.

- **Accelerationism:** extreme right-wing individuals have promoted the idea that society is inevitably collapsing, and that right-wing terrorism can accelerate its end through inciting social conflict, violence and ultimately, a race war.
- **Wider conspiracy theories:** extremist individuals have exploited a number of prevalent non-extremist conspiracy theories, related to 5G, test and trace, and anti-vaccine, which can be detrimental to public health messaging. This was based on the perception that 5G masts allowed the government to control people.
- In recent years the **LASIT (leftwing anarchist single incel terrorists), or incel (involuntary celibate)** movement has become more widely known following a shooting incident in Plymouth. The people drawn to this ideology are often described as isolated, involuntarily celibate individuals. The 'Incel Saints' are reportedly seen by some in this subculture as 'martyrs' to a cause, by a small, but potentially vulnerable and / or dangerous group of individuals who identify with misogynistic views and perspectives.
- **Campaigns in response to support of Black Lives Matter**, particularly in British football, where 'taking the knee' has resulted in several reported racist chants or shouts aimed at the players, from a minority in the spectator terraces.
- **Anti-Russian / Belarusian hatred:** Hate crime and hate incidents aimed at Russian and Belarusian nationals living in the UK, as a result of the invasion and war in Ukraine.
- **Russian state disinformation** - disinformation by Russian state media when covering the war in Ukraine, this is more likely to be spread by social media.
- **Hamas** is a Palestinian group which has ruled the Gaza Strip since 2007. The group is sworn to Israel's destruction and wants to replace it with an Islamic state. Hamas is a proscribed terrorist organisation, it is illegal to encourage support for them. However, the Palestinian conflict is a source of much emotion in the UK at the time of writing due to the humanitarian impact and devastation of civilians in Palestine.

3.7 Resources:

- To support leaders and teachers manage discussions on these topics, there are several reputable organisations that offer resources to teach about these sensitive topics in a balanced way and challenge extreme and hateful narratives. The Department's Educate Against Hate website provides a range of resources to support challenging discrimination and intolerance. It also provides advice on how to respond where you have concerns. [Educate Against Hate - Prevent Radicalisation & Extremism](#)



Prevent Risk Assessment

Appendix 1: Prevent Risk Assessment – Tier 1 NCG

Likelihood		Severity		
Almost Certain	5	Catastrophic	5	1 – 8 Low
Very Likely	4	Major	4	8 – 16 Medium
Likely	3	Moderate	3	16 – 25 High
Unlikely	2	Minor	2	
Improbable	1	None or Trivial	1	

Area/Building:	NCG Level Tier 1	Assessor:	Executive Director of Quality	Date:	Sep 2020
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Ref No.	Risk/Vulnerability	Control Measures/Actions	Likelihood x Severity = Risk L x S = R			Risk Rating: H, M, L	What further action, if any, is necessary, if so what action is to be taken by whom and by when?	Owner/s
			L	S	R			
01	IT systems: <ul style="list-style-type: none"> Individuals/Learners being able to access extremist websites whilst using Group equipment. Cyber attacks from unfriendly states or individuals 	<ul style="list-style-type: none"> E-Safety and IT Acceptable Use Policy for staff and learners which incorporates guidance on the safe use of NCG platforms, e-learning platforms, social media and email E-safe monitoring systems in place on Group learner accessible computers and across wi-fi network. Filtering & Firewall measures in place. Daily keyword web search reports to DSLs Phishing attack simulations for cyber security Cyber Security Training 	4	4	16	High	Continue vigilance; periodic reviews of reporting impact; heightened risk due to aggressive phishing attacks, increased usage in recent months and cyber-attack at South and City College Birmingham	CIDO

NCG Prevent Risk Assessment



02	Safeguarding: <ul style="list-style-type: none"> • Failure to have appropriate systems in place. • Practice that does not respond to risks • Staff lack of knowledge • Visitor speakers not properly vetted 	<ul style="list-style-type: none"> • NCG Safeguarding Policy • Freedom of Speech Policy (including for guest speakers) • NCG Prevent Risk Assessment • Safer recruitment procedures • Central record checks and annual update • Mandatory Safeguarding e-learning which incorporates Prevent • An annual update of safeguarding policies are undertaken annually • Understanding level of risks – internationally, nationally and in the community. • Designated experienced and trained safeguarding leads in place at all colleges • compliance reports for DBS and training • Periodic audits • Exit, Entry and KIT Surveys for learners • Additional security barriers to be fitted in all colleges 	2	4	8	Low	Annual review of mandatory training Annual review of single safeguarding policy Annual update on KCSIE	CEO / Principal EDQ Safeguarding Council
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Prevent Risk Assessment

Ref No.	Risk/Vulnerability	Control Measures/Actions	Likelihood x Severity = Risk L x S = R			Risk Rating: H, M, L	What further action, if any, is necessary, if so what action is to be taken by whom and by when?	Owner/s
			L	S	R			
03	Curriculum & Learning: <ul style="list-style-type: none"> • Behaviours which harm the ability of different groups and individual to learn and work together are left unchallenged 	<ul style="list-style-type: none"> • Group values and expectations are displayed and clearly communicated across the Group. • Staff are trained in challenging or referring and this is clearly signposted in the Safeguarding Policy and associated procedures • NCG Policy for Positive Student Behavior clearly outlines acceptable behaviour and appropriate language. • Security presence within the Group is adequate (where required) and staff are trained accordingly. Additional security barriers to be fitted in all colleges • Exit, Entry and KIT Surveys • Tutorial content to cover misinformation and disinformation (e.g. anti-vax campaigns) as a risk to learners 	2	3	6	Low	Impact assessment of policy and annual review of Single Safeguarding Policy and associated training	CEO / Principal EDQ Safeguarding Council

NCG Prevent Risk Assessment



04	Curriculum & Learning: <ul style="list-style-type: none"> Learners are exposed by Group staff or contracted providers relaying messages supportive of terrorism or which contradict 'British Values'. 	<ul style="list-style-type: none"> Safer recruitment procedures Staff training NCG Policy detailing whistleblowing and sharing of concerns protocols. Opportunities to promote British Values are identified within delivery Safeguarding, BVs, Prevent picked up via ETLA where missed opportunities are evident 	2	3	6	Low	Impact assessment of policy and annual review of Single Safeguarding Policy and associated training	CEO / Principal EDQ Safeguarding Council
05	Staff or contractors <ul style="list-style-type: none"> Are not aware of/do not subscribe to the values of the Group. Staff are unable or feel comfortable in raising extremism related concerns due to a lack of knowledge of systems. 	<ul style="list-style-type: none"> Information guidance document issued to persons accordingly to increase awareness and ensure they are conversant with the policy and expectations. Group Policy and Mandatory Training Exit, Entry and KIT Surveys Additional security barriers to be fitted in all colleges 	2	3	6	Low	Impact assessment of policy and annual review of Single Safeguarding Policy and associated training	CEO / Principal EDQ Safeguarding Council Director of Estates
06	Management of Space: <ul style="list-style-type: none"> Learners/Staff are exposed to speakers messaging which is supportive of terrorism or which contradicts the British Values of individual liberty and mutual respect and tolerance for those of different faiths and beliefs. 	<ul style="list-style-type: none"> Stringent checking and monitoring of external speakers (Freedom of Info Policy) Staff training carried out in respect to British Values. Safeguarding and Prevent Action Plan regularly reviewed at termly Safeguarding Meeting Specially trained DSLs and Safeguarding Teams 	2	4	8	Low	Impact assessment of policy and annual review of Single Safeguarding Policy and associated training	CEO / Principal EDQ Safeguarding Council Director of Estates
07	Information Sharing: <ul style="list-style-type: none"> Is the Group linked in with statutory partners and able to source information relating to concerns over extremism and radicalisation? 	<ul style="list-style-type: none"> Information Sharing Agreement in place working in partnership with Safer Neighborhood Police. Work of Apprenticeship Council to share concerns around local and national risk Attendance at Network of Prevent Coordinators. Safeguarding and Prevent Action Plan regularly reviewed at Safeguarding Council Specially trained DSLs and Safeguarding Teams 	2	4	8	Low	Impact assessment of policy and annual review of Single Safeguarding Policy and associated training	CEO / Principal EDQ Safeguarding Council Director of Estates

NCG Prevent Risk Assessment



08	Radicals and extremists within Group staff and/or learners	<ul style="list-style-type: none"> All staff trained and appropriate direct reporting lines are in place on what action to take. E-safe monitoring of computer usage and actions taken to follow up in accordance with guidelines. External Speaker Policy and other associated policies in place. Safeguarding and Prevent Action Plan and associated practice reviewed at Safeguarding Council Phishing attack simulation Specially trained DSLs and Safeguarding Teams 	3	4	12	Med	Impact assessment of policy and annual review of Single Safeguarding Policy and associated training	CEO / Principal EDQ Safeguarding Council Director of Estates
09	Unauthorised persons: <ul style="list-style-type: none"> Persons on site with a view to influencing others or promoting propaganda. 	<ul style="list-style-type: none"> Access Control systems and barriers CCTV Dedicated Security personnel Emergency Phone line Safeguarding and Prevent Action Plan regularly reviewed at the half termly Safeguarding Meeting Specially trained DSLs and Safeguarding Teams 	3	4	12	Med	Ongoing monitoring and action-response	CEO / Principal Director of Estates
10	Heightened risk from County Lines and youth organized violence	<ul style="list-style-type: none"> Monitoring and exchange of information via safeguarding Council College briefings to staff and students Updates from regional Prevent Coordinator circulated via Safeguarding Council Teams site Exit, Entry and KIT Surveys Specially trained DSLs and Safeguarding Teams 	3	4	16	Med	Ongoing monitoring and action-response; risk is present to learners due to outside influences.	CEO / Principal EDQ Safeguarding Council Director of Estates
11	Heightened risk from online crime and online extremism	<ul style="list-style-type: none"> System penetration testing and firewalls Web filters and alerts Monitoring and exchange of information via safeguarding Council and ILT development group College briefings to staff and students Updates from regional Prevent coordinator circulated via Safeguarding Council Teams site for college dissemination Ongoing upgrade of web alerts Specially trained DSLs and Safeguarding Teams 	3	4	12	Med	Ongoing monitoring and action-response; risk is present to learners	CEO / Principal CIDO EDQ



Appendix 2: Prevent Risk Assessment – Version 2 – mapped to ETF Exemplar for information only

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

No	Risk Title	Summary	Gross Score	Existing Controls	Residual Score	Further Action Needed	RAG rating
1	Online Safety	<p>Extremist organisations are able to radicalise students online and encourage them to commit acts of violence or incite others to commit acts of violence as ‘lone actors’.</p> <p>Learners (and staff) are able to access unlawful radicalising material which promotes proscribed terrorist groups.</p>	4 x 5	<ul style="list-style-type: none"> E-Safety and IT Acceptable Use Policy for staff and learners which incorporates guidance on the safe use of Social Media. E-safe monitoring systems in place on Group learner accessible computers and across wi-fi network. Filtering & Firewall measures in place. Prevent Action Plan regularly reviewed at Safeguarding council 	2 x 5		
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>	4 x 5	<ul style="list-style-type: none"> Information Sharing Agreement in place working in partnership with Safer Neighbourhood Police. Established system and protocols of sharing information. Attendance at Network of Prevent Coordinators. Safeguarding and Prevent Action Plan regularly reviewed at safeguarding council 	2 x 4		
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>	4 x 5	<ul style="list-style-type: none"> Group values and expectations are displayed and clearly communicated across the Group. Staff are trained in challenging or 	2 x 5		



		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.		referring and this is clearly signposted in the Safeguarding and other associated Policies such as Equality and Diversity. <ul style="list-style-type: none"> • Student Positive Behavior Policy outlines acceptable behaviour and appropriate language. • Security presence within the Group is adequate (where required) and staff are trained accordingly. 			
4	Staff training and awareness	<p>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>Leaders and staff feel unable or unwilling to challenge extremist narratives or exemplify British Values throughout the organisation.</p> <p>Staff are unclear on how to deal with or refer concerns resulting in individuals not being supported and potentially radicalisation remaining unchecked.</p>	5 x 5	<ul style="list-style-type: none"> • All Group staff receive mandatory Safeguarding e-learning which incorporates Prevent • A full review of safeguarding and associated policies are undertaken annually • Understanding level of risk – locally and in wider community. • Designated experienced and trained safeguarding officers in place at all colleges • External audits completed by PWC 	2 x 5		
5	Speakers and events	<p>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>Inappropriate or extremist materials are shared with learners (face to face or via weblinks) because insufficient checks are made of external speakers and materials that they promote or share.</p>	5 x 5	<ul style="list-style-type: none"> • Stringent checking and monitoring of external speakers. • Staff training carried out in respect to British Values. <p>Safeguarding and Prevent Action Plan regularly reviewed at termly Safeguarding Meeting</p>	2 x 5		
6	Welfare & Pastoral	The organisation does not provide effective		<ul style="list-style-type: none"> • Personal tutors • Pastoral staff 	2 x 5	•	



	Care	welfare and pastoral support which results in learners (and staff) being unsupported and the risk of vulnerabilities being exploited.	3 x 5	<ul style="list-style-type: none"> • Helpline support • College specific 			
7	Prayer & Faith Facilities	<p>Requirements of learners (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>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>	3 x 5	<ul style="list-style-type: none"> • College specific 	2 x 5		
8	Work based learners	<p>The organisation does not have robust processes in place to protect work-based students from the risks of radicalisation or views and practices contrary to British Values.</p> <p>Employers within work-based settings are unaware of issues relating to Prevent the Statutory Duty and how to report concerns.</p>	5 x 5	<ul style="list-style-type: none"> • All Group staff receive mandatory Safeguarding e-learning which incorporates Prevent • A full review of safeguarding and associated policies are undertaken annually • Content delivered via induction and re-visited during progress review • Dedicated handbooks in place for apprentices • Designated experienced and trained safeguarding officers in place at all colleges • External audits completed by PWC 	2 x 5		
9	Promoting British Values	The Group does not have a culture and ethos where British Values are celebrated, which leads to a culture of disrespect and intolerance and where tensions are allowed to flourish.	3 x 5	<ul style="list-style-type: none"> • Group values developed through widespread consultation and widely promoted • Equality and Diversity strategy document 	2 x 5		



		Staff and learners do not understand BV (or feel confident about) and extremist views and narratives are allowed to flourish unchallenged.		<ul style="list-style-type: none"> College specific 			
10	Campus Security	<p>The organisation does not have sufficient security of its premises and learners are targeted by individuals or groups seeking to share their extremist views or endanger their personal safety.</p> <p>Charities are allowed on campus without effective checks or charitable collections are inadvertently diverted to inappropriate or unlawful causes.</p> <p>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>	5 x 5	<ul style="list-style-type: none"> Access Control systems CCTV Dedicated Security personnel Emergency Phone line Safeguarding and Prevent Action Plan regularly reviewed at Safeguarding Council 	3 x 5		