

<b><u>Policy Title</u></b>	<b>Prevent Risk Assessment - An annex to the NCG Safeguarding Policy</b>	
<b><u>Policy Category</u></b>	Cascade	
<b><u>Owner</u></b>	Executive Director Quality	
<b><u>Group Executive Lead</u></b>	Executive Director Quality	
<b><u>Date Written</u></b>	Sep 2020	
<b><u>Considered By</u></b>	Safeguarding Council	
<b><u>Approved By</u></b>	Executive Board	
<b><u>Date Approved</u></b>	Sep 2020	
<b><u>Equality Impact Assessment</u></b>	The implementation of this policy is not considered to have a negative impact on protected characteristics	
<b><u>Freedom of Information</u></b>	This document will / will not be publicly available through the Groups Publication Scheme.	
<b><u>Review Date</u></b>	Sep 2020	
<b><u>Policy Summary</u></b>	Annual update to policy to remain compliant with legislation and guidance, specifically Keeping Children safe in Education 2020 revision and Counter Terrorism. Strengthens arrangements for remote and blended delivery and cyber security.	
<b><u>Applicability of Policy</u></b>	<b><u>Consultation Undertaken</u></b>	<b><u>Applicable To</u></b>
Newcastle College	Yes	Yes
Newcastle Sixth Form	Yes	Yes
Carlisle	Yes	Yes
Kidderminster	Yes	Yes
Lewisham	Yes	Yes
Southwark	Yes	Yes
West Lancashire	Yes	Yes
Professional Services	Yes	Yes
<b><u>Changes to Earlier Versions</u></b>		
<b><u>Previous Approval Date</u></b>	<b><u>Summarise Changes Made Here</u></b>	
March 2019	Interim update	
September 2020	Reviewed as per policy cycle. Inclusion of heightened risks. Updated in light of Covid-19.	
<b><u>Linked Documents</u></b>		
<b><u>Document Title</u></b>	<b><u>Relevance</u></b>	
College Safeguarding Procedures	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	
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.	
Equality Strategy	Arrangement for promoting equality of opportunity	

## 1. Scope and Purpose of Policy

NCG is committed to providing a safe working and learning environment for all its employees, learners, contractors and other persons that visit the Group. This also extends to staff and learners working remotely through asynchronous and synchronous delivery and routine business functions.

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. A number of very specific risks, that have been heightened in recent months are highlighted here <https://educateagainsthate.com/wp-content/uploads/2020/09/How-extremists-are-using-COVID-19-to-promote-disinformation-misinformation-and-conspiracy-theories.pdf>

## 2. Policy Statement

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.

### 2.1. Legislative Requirements

Under the provision 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.

### 2.2. Risk Assessment

Both Group Services and all 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 not just violent extremism but also non-violent extremism, which can create an atmosphere conducive to terrorism and can popularise radical views, potentially exploited by terror groups or individuals. The risks of online material has never been higher as the COVID pandemic of 2020 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.

### 2.3. Risk Assessment Review

It is the responsibility of the Group 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.

### 2.4. Heightened risks due to COVID 19

The risk assessment responds to a number of heightened risks that have become apparent due to the outbreak of COVID and the increased reliance of home working and home study. Guidance is issued via the educate against hate website: <https://educateagainsthate.com/resources/covid-19-prevent-guidance-for-schools-and-further-education-providers/> and is grouped into:

- **‘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.

Staff are required to understand the impact of this online material, that can often be ‘dressed’ as joke emails, videos, blogs to mask the real intent.

The guidance also highlights how this material exchange may be transferred during COVID lockdowns/ isolation.

- Exposed to misleading and hateful content: Young people may have been exposed to fake stories or conspiracy theories about COVID-19, which attribute blame on minority groups.
- Engaged with extremist individuals: Young people may have become exposed to or engaged with extremist organisations or individuals, especially online.
- Increased vulnerability to radicalisation: COVID-19 may have increased vulnerability to radicalisation as children and young people may feel isolated, anxious, frustrated, and angry. This could increase the resonance of intolerant messaging and appeal of extremist groups or individuals offering explanations for the crisis.

Furthermore, the Commission for Countering-Extremism (CCE) have highlighted the following prominent extremist narratives:

- **Antisemitism:** Several conspiracies blame the Jewish community for spreading the virus, including claims that COVID-19 is a Jewish plot, either as a hoax or a deliberate creation, to remove civil liberties and impose totalitarian rule. Please note the international definition of antisemitism is available here: <https://antisemitism.org/definition/>
- **Anti-Muslim hatred:** Claims that British Muslims have flouted social distancing rules and spread the virus have been promoted, particularly on social media. Whilst these have been disproven, high profile extreme right-wing influencers have blamed Muslims for the spread of the virus.
- **Anti-Chinese hatred:** Hate crime and hate incidents towards Chinese people have risen. Reports have found a 300% increase in the use of 'hashtags' that encourage or incite violence against China and Chinese people online.
- **Islamist:** Islamist 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:** Right-wing extremists have similarly 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, track and trace and anti-vax, which can be detrimental to public health messaging. In some cases, these have been linked to antisemitic or other hateful narratives. Although Left-Wing, Anarchist and Single-Issue (LASI) extremism is low, a minority of individuals have supported the targeting of 5G masts. This was based on the perception that masts allowed the government to control people.



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	<b>IT systems:</b> <ul style="list-style-type: none"> <li>Individuals/Learners being able to access extremist websites whilst using Group equipment.</li> </ul>	<ul style="list-style-type: none"> <li>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</li> <li>E-safe monitoring systems in place on Group learner accessible computers and across wi-fi network.</li> <li>Filtering &amp; Firewall measures in place.</li> <li>Prevent Action Plan regularly reviewed at the termly Safeguarding Meeting.</li> <li>Phishing attack simulations for cyber security</li> </ul>	4	4	16	High	Continue vigilance; periodic reviews of reporting impact; heightened risk due to aggressive phishing attacks and increased usage in recent months	CIDO

02	<p><b>Safeguarding:</b></p> <ul style="list-style-type: none"> <li>Failure to have appropriate systems in place.</li> </ul> <p>Practice that does not respond to risks</p> <ul style="list-style-type: none"> <li>Staff lack of knowledge</li> </ul>	<ul style="list-style-type: none"> <li>Safer recruitment procedures</li> <li>Central record checks and annual update</li> <li>Mandatory Safeguarding e-learning which incorporates Prevent</li> <li>An annual update of safeguarding policies are undertaken annually</li> <li>Understanding level of risks – internationally, nationally and in the community.</li> <li>Designated experienced and trained safeguarding leads in place at all colleges</li> <li>compliance reports for DBS and training</li> <li>Periodic audits</li> </ul>	2	4	8	Low	<p>Annual review of mandatory training</p> <p>Annual review of single safeguarding policy</p> <p>Annual update on KCSIE</p>	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	<p><b>Curriculum &amp; Learning:</b></p> <ul style="list-style-type: none"> <li>Behaviours which harm the ability of different groups and individual to learn and work together are left unchallenged</li> </ul>	<ul style="list-style-type: none"> <li>Group values and expectations are displayed and clearly communicated across the Group.</li> <li>Staff are trained in challenging or referring and this is clearly signposted in the Safeguarding Policy and associated procedures</li> <li>NCG Policy for Positive Student Behavior clearly outlines acceptable behaviour and appropriate language.</li> <li>Security presence within the Group is adequate (where required) and staff are trained accordingly.</li> </ul>	2	3	6	Low	Impact assessment of policy and annual review of Single Safeguarding Policy and associated training	CEO / Principal EDQ Safeguarding Council
04	<p><b>Curriculum &amp; Learning:</b></p> <ul style="list-style-type: none"> <li>Learners are exposed by Group staff or contracted providers relaying messages supportive of terrorism or which contradict 'British Values'.</li> </ul>	<ul style="list-style-type: none"> <li>Safer recruitment procedures</li> <li>Staff training</li> <li>NCG Policy detailing whistleblowing and sharing of concerns protocols.</li> <li>Opportunities to promote British Values are identified within delivery</li> <li>Safeguarding, BVs, Prevent picked up via ETLA where missed opportunities are evident</li> </ul>	2	3	6	Low	Impact assessment of policy and annual review of Single Safeguarding Policy and associated training	CEO / Principal EDQ Safeguarding Council

05	<b>Staff or contractors</b> <ul style="list-style-type: none"> <li>• Are not aware of/do not subscribe to the values of the Group.</li> <li>• Staff are unable or feel comfortable in raising extremism related concerns due to a lack of knowledge of systems.</li> </ul>	<ul style="list-style-type: none"> <li>• Information guidance document issued to persons accordingly to increase awareness and ensure they are conversant with the policy and expectations.</li> <li>• Group Policy and Mandatory Training</li> </ul>	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	<b>Management of Space:</b> <ul style="list-style-type: none"> <li>• 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.</li> </ul>	<ul style="list-style-type: none"> <li>• Stringent checking and monitoring of external speakers.</li> <li>• Staff training carried out in respect to British Values.</li> <li>• Safeguarding and Prevent Action Plan regularly reviewed at termly Safeguarding Meeting</li> </ul>	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	<b>Information Sharing:</b> <ul style="list-style-type: none"> <li>• Is the Group linked in with statutory partners and able to source information relating to concerns over extremism and radicalisation?</li> </ul>	<ul style="list-style-type: none"> <li>• Information Sharing Agreement in place working in partnership with Safer Neighborhood Police.</li> <li>• Work of Apprenticeship Council to share concerns around local and national risk</li> <li>• Attendance at Network of Prevent Coordinators.</li> <li>• Safeguarding and Prevent Action Plan regularly reviewed at Safeguarding Council</li> </ul>	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
08	<b>Radicals and extremists within Group staff and/or learners</b>	<ul style="list-style-type: none"> <li>• All staff trained and appropriate direct reporting lines are in place on what action to take.</li> <li>• E-safe monitoring of computer usage and actions taken to follow up in accordance with guidelines.</li> <li>• External Speaker Policy and other associated policies in place.</li> <li>• Safeguarding and Prevent Action Plan and associated practice reviewed at Safeguarding Council</li> <li>• Phishing attack simulation</li> </ul>	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	<b>Unauthorised persons:</b> <ul style="list-style-type: none"> <li>Persons on site with a view to influencing others or promoting propaganda.</li> </ul>	<ul style="list-style-type: none"> <li>Access Control systems</li> <li>CCTV</li> <li>Dedicated Security personnel</li> <li>Emergency Phone line</li> <li>Safeguarding and Prevent Action Plan regularly reviewed at the half termly Safeguarding Meeting</li> </ul>	3	4	12	Med	Ongoing monitoring and action-response	CEO / Principal Director of Estates
10	<b>Heightened risk from County Lines and youth organized violence</b>	<ul style="list-style-type: none"> <li>Monitoring and exchange of information via safeguarding Council</li> <li>College briefings to staff and students</li> <li>Updates from regional Prevent coordinator circulated via Safeguarding Council Teams site</li> </ul>	4	4	16	High	Ongoing monitoring and action-response; risk is present to learners	CEO / Principal EDQ Safeguarding Council Director of Estates
11	<b>Heightened risk from online crime and online extremism</b>	<ul style="list-style-type: none"> <li>System penetration testing and firewalls</li> <li>Web filters and alerts</li> <li>Monitoring and exchange of information via safeguarding Council and ILT development group</li> <li>College briefings to staff and students</li> <li>Updates from regional Prevent coordinator circulated via Safeguarding Council Teams site for college dissemination</li> </ul>	4	4	16	High	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"> <li>E-Safety and IT Acceptable Use Policy for staff and learners which incorporates guidance on the safe use of Social Media.</li> <li>E-safe monitoring systems in place on Group learner accessible computers and across wi-fi network.</li> <li>Filtering &amp; Firewall measures in place.</li> <li>Prevent Action Plan regularly reviewed at Safeguarding council</li> </ul>	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"> <li>Information Sharing Agreement in place working in partnership with Safer Neighbourhood Police.</li> <li>Established system and protocols of sharing information.</li> <li>Attendance at Network of Prevent Coordinators.</li> <li>Safeguarding and Prevent Action Plan regularly reviewed at safeguarding council</li> </ul>	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"> <li>Group values and expectations are displayed and clearly communicated across the Group.</li> <li>Staff are trained in challenging or referring and this is clearly</li> </ul>	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.		<p>signposted in the Safeguarding and other associated Polices such as Equality and Diversity.</p> <ul style="list-style-type: none"> <li>• Student Positive Behavior Policy outlines acceptable behaviour and appropriate language.</li> <li>• Security presence within the Group is adequate (where required) and staff are trained accordingly.</li> </ul>			
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"> <li>• All Group staff receive mandatory Safeguarding e-learning which incorporates Prevent</li> <li>• A full review of safeguarding and associated polices are undertaken annually</li> <li>• Understanding level of risk – locally and in wider community.</li> <li>• Designated experienced and trained safeguarding officers in place at all colleges</li> <li>• External audits completed by PWC</li> </ul>	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"> <li>• Stringent checking and monitoring of external speakers.</li> <li>• Staff training carried out in respect to British Values.</li> </ul> <p>Safeguarding and Prevent Action Plan regularly reviewed at termly Safeguarding Meeting</p>	2 x 5		
6	Welfare & Pastoral Care	The organisation does not provide effective welfare and pastoral support which results in learners (and staff) being unsupported and	3 x 5	<ul style="list-style-type: none"> <li>• Personal tutors</li> <li>• Pastoral staff</li> <li>• Helpline support</li> <li>• College specific</li> </ul>	2 x 5	•	

		the risk of vulnerabilities being exploited.					
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"> <li>College specific</li> </ul>	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"> <li>All Group staff receive mandatory Safeguarding e-learning which incorporates Prevent</li> <li>A full review of safeguarding and associated policies are undertaken annually</li> <li>Content delivered via induction and re-visited during progress review</li> <li>Dedicated handbooks in place for apprentices</li> <li>Designated experienced and trained safeguarding officers in place at all colleges</li> <li>External audits completed by PWC</li> </ul>	2 x 5		
9	Promoting British Values	<p>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.</p> <p>Staff and learners do not understand BV (or feel confident about) and extremist views and narratives are allowed to flourish</p>	3 x 5	<ul style="list-style-type: none"> <li>Group values developed through widespread consultation and widely promoted</li> <li>Equality and Diversity strategy document</li> <li>College specific</li> <li></li> </ul>	2 x 5		

		unchallenged.				
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"> <li>• Access Control systems</li> <li>• CCTV</li> <li>• Dedicated Security personnel</li> <li>• Emergency Phone line</li> <li>• Safeguarding and Prevent Action Plan regularly reviewed at Safeguarding Council</li> </ul>	3 x 5	