



# Preventing Terrorism & Radicalisation Policy

Document Status	
Author	Head of Security
Date of Origin	April 2021
Version	1.0
Date of Approval	
Review Requirements	Annually
Date of Next Review	April 2022
Approval Body	Executive Management Team

## **1 Background and aims**

The aim of the government's Prevent strategy is to reduce the threat to the UK from terrorism by stopping people becoming terrorists or supporting terrorism. This is part of an overall counter-terrorism strategy called CONTEST. In the new Counter-Terrorism and Security Act 2015 this has simply been expressed as "*prevent people from being drawn into terrorism*".

The government's Prevent strategy has three specific strategic objectives:

1. Respond to the ideological challenge of terrorism and the threat we face from those who promote it;
2. Prevent people from being drawn into terrorism and ensure that they are given appropriate advice and support; and
3. Work with sectors and institutions where there are risks of radicalisation that we need to address.

*Prevent* work is intended to deal with all kinds of terrorist threats to the UK. The most significant of these threats is currently from Al-Qaeda associated groups and from other terrorist organisations in Syria and Iraq. But terrorists associated with the extreme right also pose a continued threat to our safety and security.

The Government has defined extremism in the *Prevent* strategy as: "vocal or active opposition to fundamental British values, including democracy, the rule of law, individual liberty and mutual respect and tolerance of different faiths and beliefs. We also include in our definition of extremism calls for the death of members of our armed forces".

## **2 Aims**

The aim of this policy is to ensure, as far as possible, is that the College is fulfilling the duty in sections 26 and 29 of the Counter-Terrorism and Security Act 2015. United Colleges Group will participate fully in work to prevent people from being drawn into terrorism and that should this occur there are procedures to deal with them.

### 3 The Legal Position

#### 3.1 The Counter-Terrorism and Security Act 2015

This places a duty on colleges to have due regard to the need to prevent people from being drawn into terrorism. While this duty is not new to colleges the secretary of state has been given new powers to place specific duties on colleges. These are outlined in the Prevent duty statutory guidance (March 2015 HM government) as follows:

Specific Duty	Response
<b>Partnership:</b> To demonstrate effective compliance with the duty, Colleges must demonstrate active engagement from governors, boards, principals, managers and leaders with regional Prevent co-ordinators, the police and local authorities, and co-ordination through multi-agency forums, for example Community Safety Partnerships.	The engagement with other partners including police and local authority Prevent co-ordinators is explained below in section 3.
Where the size of an institution warrants, management and co-ordination arrangements should be implemented to share information across the relevant curriculum areas within an institution, with a single point of contact for operational delivery of Prevent-related activity.	The Designated Lead for Safeguarding is the single point of contact, working closely with the Head of Security. Staff are trained to refer all matters of this type to them.
<b>Risk assessment:</b> Each institution should carry out a risk assessment which assesses where and how students or staff may be at risk of being drawn into terrorism.	United Colleges Group's risk assessment appears in appendix 1.
The risk assessment to address the physical management of United Colleges Group Campuses, including policies and procedures for events held by staff, students or visitors, and relationships with external bodies and community groups who may use premises, or work in partnership with the institution.	Information on this duty is included below in section 7.
<b>Action Plan:</b> Any institution that identifies a risk should notify the relevant Prevent co-ordinator and others as necessary and develop a Prevent action plan to set out the actions they will take to mitigate the risks.	As specified in the UCG Risk Assessment & Action Plan
<b>Staff Training:</b> United Colleges Group must demonstrate that it undertakes appropriate training and development for principals, governors, leaders and staff.	United Colleges Group will provide appropriate training for all staff and governors, see risk assessment in appendix.

<p>At a corporate level there is an expectation on the institution to have robust procedures both internally and externally for sharing information about vulnerable individuals. This should include information sharing agreements where possible.</p>	<p>United Colleges Group shares prevent information at Corporate level via safeguarding reports and through the safeguarding steering group meetings. United Colleges Group may need to share personal information externally to ensure, for example, that a person at risk of radicalisation is given appropriate support (for example on the Channel programme). Information sharing must be assessed on a case-by-case basis and is governed by legislation such as the Data protection act and the Common Law Duty of Confidentiality. United Colleges Group is committed to sharing information within the confines of legislation.</p>
<p><b>Welfare, pastoral care and support:</b> The College has a clear role to play in the welfare of their students and is expected to have sufficient pastoral care and support available for all students.</p>	<p>Student Support provides this role across the College group and deliver tutorials and induction sessions to explain their role to students.</p>
<p>The College is expected to have clear and widely available policies for the use of prayer rooms and other faith-related facilities. These policies should outline structures in place for the management of prayer and faith facilities (for example an oversight committee) and mechanisms for managing any issues arising from the use of the facilities.</p>	<p>There are student instructions on location regarding the use of the facilities which are managed as appropriate by the student support team.</p>
<p><b>IT policies:</b> Colleges should have policies relating to the use of IT on the premises which contain specific reference to the duty.</p>	<p>The College's IT code of conduct states that staff and students must not 'display, store, print or transmit images or text which could be considered offensive e.g. material of a terrorist nature'.</p>
<p>Institutions must have clear policies in place for students and staff using IT equipment to research terrorism and counter terrorism in the course of their learning.</p>	<p>The College's IT code of conduct will be updated to include the process for this.</p>
<p><b>Monitoring and enforcement:</b> Where Ofsted finds a publicly-funded further education institution or independent training provider inadequate for safeguarding intervention action would be taken. This could lead to governance and leadership change, restructuring or even dissolution under the Secretary of State's reserve powers.</p>	<p>United Colleges Group has a quality process and full reporting schedule to ensure that it meets the requirements of Ofsted.</p>

#### **4 The Equality Act 2010 and Keeping Children Safe in Education**

The Prevent duty is relevant to fulfilling other responsibilities such as the duty arising from section 149 of the Equality Act 2010.

The College, as a public body, recognises this duty placed upon it by the above Act to:

- Eliminate unlawful discrimination, harassment and victimisation and other conduct prohibited by the Act
- Advance equality of opportunity between people who share a protected characteristic and those who do not
- Foster good relations between people who share a protected characteristic & those who do not.

For further information refer to the College's Equality and Diversity Policy.

United Colleges Group also has a Safeguarding and Child Protection Policy which should be referred to in conjunction with this policy.

#### **5 Engagement with other partners including police and local authority *Prevent* co-ordinators**

The College's Head of Security is a member of the HE and FE Prevent London Region Group chaired by the prevent co-ordinator for London. The Head of Security is also a member of the Brent Prevent Delivery Group & The Brent Prevent Steering Group chaired by Kibibi Octave at Brent Local Authority.

Through this the Head of Security is also in direct contact with the Brent Channel Multi Agency Programme (Front Door).

All referrals are made to the Police through the Head of Security.

#### **6 Staff responsibilities and examples of suspicious activity**

All staff are part of a multi-agency approach to protect students at risk from radicalisation. All suspicions of activity of this kind should be immediately referred to a safeguarding officer or the Head of Security.

Example indicators that an individual is engaged with an extremist group, cause or ideology include:

- Spending increasing time in the company of other suspected extremists;
- Changing their style of dress or personal appearance to accord with the group;
- Their day-to-day behaviour becoming increasingly centred around an extremist ideology, group or cause;
- Loss of interest in other friends and activities not associated with the extremist ideology, group or cause;
- Possession of material or symbols associated with an extremist cause (e.g. the swastika for far-right groups);
- Attempts to recruit others to the group/cause/ideology; or
- Communications with others that suggest identification with a group/cause/ideology.

Example indicators that an individual has an intention to use violence or other illegal means include:

- Clearly identifying another group as threatening what they stand for and blaming that group for all social or political ills;

- Using insulting or derogatory names or labels for another group;
- Speaking about the imminence of harm from the other group and the importance of action now;
- Expressing attitudes that justify offending on behalf of the group, cause or ideology;
- Condoning or supporting violence or harm towards others; or
- Plotting or conspiring with others.

<http://www.homeoffice.gov.uk/publications/counter-terrorism/prevent/prevent-strategy/>

## **7 Management of events and speakers**

The College is committed to denying access to those persons who promote extremist views that support or are conducive to terrorism. United College Group only provide external speaking events to known and authorised local authority partners and approved by the Head of Student Support Services. All events are monitored by Student Support Services and the aims agreed in advance.

The Letting Manager is responsible for providing event specific risk assessments to the Safeguarding Team for private lettings events taking place at any UCG campus.

## **8 Code of Practice on Freedom of Speech**

Section 43 of the Education (No 2) Act 1986: requires the College to issue and keep up to date a code of practice to be followed by members, students, and employees of the College for the organisation of meetings and other events, which are to be held on College premises, and for the conduct required of members, students, and employees of the College in connection with meetings and other events.

Staff, visiting speakers and students of the College must conduct themselves so as to ensure that freedom of speech is within the law. The College believes that a culture of free, open and robust discussion can be achieved only if all concerned avoid needlessly offensive or provocative action and language.

Any external speakers must be approved by the Head of Student Support Services and all concerns and final decisions will be the responsibility of the Head of Student Support Services. In these incidences the Head of Student Support Services will rate the risks associated and decide on the appropriate outcome.

There should be sufficient information about the event including topics and any speakers and sufficient notice to allow for checks to be made and cancellation to take place if necessary prior to the event.

Any staff or students that become aware of any incidents or instances where off-campus events of concern are promoted on campus should be reported immediately to the Head of Student Support Services and/or the Security Team.

## **9 Fundamental British values**

As part of United Colleges Group commitment to delivering the Prevent agenda students will be engaged through promotional events and tutorials to understand the dangers associated with involvement in extremism and the promotion of fundamental British values. Furthermore, students will be encouraged to develop their critical thinking skills through tutorials and as part of the curriculum.

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## **11 Useful Links**

**Channel: Protecting vulnerable people from being drawn into terrorism HM Government 2012**

[https://www.gov.uk/government/uploads/system/uploads/attachment\\_data/file/118194/channel-guidance.pdf](https://www.gov.uk/government/uploads/system/uploads/attachment_data/file/118194/channel-guidance.pdf)

**Keeping children safe in education Statutory guidance for schools and colleges April 2014**

<https://www.gov.uk/government/publications/keeping-children-safe-in-education>

**Information booklet on Syria** <http://www.met.police.uk/Syria/booklet.pdf>



## SPECIFIC RISK ASSESSMENT

<b>Area(s) Assessed:</b>	United College's Group - Prevent Risk Assessment & Action Plan																																																								
<b>Manager / Division:</b>	Head of Security																																																								
<b>Extension Number:</b>	5117																																																								
<b>Date of Assessment:</b>	09/02/21																																																								
<b>Review Date:</b>	September 2021																																																								
<b>Time of Day:</b>	N/A																																																								
<b>Persons present in area?</b>	No																																																								
<b>Purpose</b>	To ensure the College is fulfilling its statutory responsibility to deliver the Prevent Duty, which is an integral part of the government's counter terrorism and domestic extremism CONTEST strategy. And to enable the College to better safeguard its students, staff and all other stakeholders	<table border="1" style="margin: auto; border-collapse: collapse;"> <thead> <tr> <th colspan="2"></th> <th>VU</th> <th>U</th> <th>PO</th> <th>PR</th> <th>NC</th> </tr> </thead> <tbody> <tr> <th rowspan="5" style="writing-mode: vertical-rl; transform: rotate(180deg);">Severity</th> <th>5</th> <td style="background-color: yellow;">5Y</td> <td style="background-color: yellow;">10R</td> <td style="background-color: red;">15</td> <td style="background-color: red;">20</td> <td style="background-color: red;">25</td> </tr> <tr> <th>4</th> <td style="background-color: green;">4</td> <td style="background-color: yellow;">8</td> <td style="background-color: red;">12</td> <td style="background-color: red;">16</td> <td style="background-color: red;">20</td> </tr> <tr> <th>3</th> <td style="background-color: green;">3</td> <td style="background-color: green;">6G</td> <td style="background-color: yellow;">9</td> <td style="background-color: red;">12</td> <td style="background-color: red;">15R</td> </tr> <tr> <th>2</th> <td style="background-color: green;">2</td> <td style="background-color: green;">4</td> <td style="background-color: yellow;">6Y</td> <td style="background-color: yellow;">8</td> <td style="background-color: yellow;">10Y</td> </tr> <tr> <th>1</th> <td style="background-color: green;">1</td> <td style="background-color: green;">2</td> <td style="background-color: green;">3</td> <td style="background-color: green;">4</td> <td style="background-color: yellow;">5G</td> </tr> <tr> <th colspan="2"></th> <th>1</th> <th>2</th> <th>3</th> <th>4</th> <th>5</th> </tr> <tr> <th colspan="2"></th> <th colspan="5" style="text-align: center;">Likelihood</th> </tr> </tbody> </table> <p style="font-size: small; margin-top: 5px;"> <span style="background-color: green; padding: 2px;">Green</span> = Low Significance             <span style="background-color: yellow; padding: 2px;">Yellow</span> = Medium Significance             <span style="background-color: red; padding: 2px;">Red</span> = Major Significance            VU = Very unlikely, U = Unlikely, PO = Possible, PR = Probable, NC = Near certainty         </p>						VU	U	PO	PR	NC	Severity	5	5Y	10R	15	20	25	4	4	8	12	16	20	3	3	6G	9	12	15R	2	2	4	6Y	8	10Y	1	1	2	3	4	5G			1	2	3	4	5			Likelihood				
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	(Identify relevant staff to location and designation only, Curriculum manager, lecturer/s and technician). All staff, students, visitors and contractors																																																								

Section 26(1) of the Counter-Terrorism and Security Act 2015 ("the Act") imposes a duty on "specified authorities", when exercising their functions, to have due regard to the need to prevent people from being drawn into terrorism. There is an important role for further education institutions, including sixth form colleges and independent training providers, in helping prevent people being drawn into terrorism, which includes not just violent extremism but also non-violent extremism, which can create an atmosphere conducive to terrorism and can popularise views, which terrorists exploit. It is a condition of funding that all further education and independent training providers must comply with relevant legislation and any statutory responsibilities associated with the delivery of education and safeguarding of learners.

No:	Vulnerability	Severity (a)	Likelihood (b)	Risk rating (=a x b)	Action to mitigate/remove vulnerability	Revised severity (a)	Revised likelihood (b)	Revised Risk rating (=a x b)	Further Action Required?	Target Date:	Who:	Complete Date:
1	<p><b>Awareness</b> Do the following people have a good understanding of Prevent</p> <p>&gt;Board of Governors &gt;Executive Team &gt;Staff &gt;Student Union &gt;Safeguarding leads &gt;Security Staff</p>	4	4	16	<p>---- Designated governor for Safeguarding/Prevent----</p> <p>---- Safeguarding briefings for Governors is built into the annual cycle.----</p> <p>---- Responsibility for all aspects of safeguarding sits with a member of the Senior Leadership Team ( Vice-Principal Quality of Education) ----</p> <p>---- Governors are clear and informed on safeguarding &amp; Prevent issues within the college. Safeguarding &amp; Prevent training for governors delivered on 18/09/2019.----</p> <p>---- All new members of staff required to attend a session on Prevent or complete on-line Prevent training. Awareness of Prevent embedded in the Safeguarding Induction programme.----</p> <p>---- Prevent training for CWC staff January 2019. Safeguarding &amp; Prevent training for all UCG support staff 18/10 2019. Staff Dev activities on 06/01/2020 included safeguarding &amp; prevent updating for support staff. 60+ staff members attended.----</p> <p>---- Contract security staff receive safeguarding &amp; Prevent training. This is monitored in partnership with the contracted security provider.----</p>	4	2	8	<p>College to develop a rolling programme of bit-size staff update training on national security related priorities.</p> <p>Ensure ALL staff receive Safeguarding &amp; Prevent update.</p> <p>Student Union/Council specific training to challenge extremist narratives.</p>	<p>Ongoing</p> <p>Ongoing</p> <p>30/03/21</p>	<p>VPQE &amp; DG</p> <p>VPQE</p> <p>VPQE</p>	

		VU	U	PO	PR	NC
Consequence	5	5Y	10R	15	20	25
	4	4	8	12	16	20
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**Consequence: Definition/Examples:**  
5 – Critical      Could result in a critical incident  
4 – Major        Serious impact to the course of action and outcome  
3 – Moderate    Effects are felt, but not critical to outcome  
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**Likelihood:**  
5 – Imminent 4 - very probable 3 - Quite likely 2 – Possible 1 - not very likely

2	<p><b>Safeguarding</b> Do safeguarding and student support service leads recognise Prevent vulnerabilities and what to do if they suspect that someone is being drawn into extremism?</p> <p>Are safeguarding leads aware of Channel?</p> <p>Do safeguarding policies incorporate Prevent vulnerabilities?</p> <p>Are you using the Early Help Assessment to refer individuals?</p>	5	4	20	<p>--- Safeguarding leads are familiar with prevent Referral procedures through attendance at WRAP training and membership of London FE/HE network----</p> <p>---- Prevent related responsibilities and action to take are outlined in safeguarding training and embedded in Safeguarding Policy.----</p> <p>----- Close partnership with Brent Front Door. Westminster Children’s Services and the Local Prevent Co-Ordinators.----</p> <p>----- UCG is represented on Local Safeguarding Partnership Boards and Safer Neighbour Forums.-----</p> <p>---- The College has established links to Integrated Gangs and Anti-Social behaviour support units, where people of concern in communities are discussed, these people of concern can be matched against enrolments and appropriate safeguarding strategies applied.----</p> <p>---- UCG is hosted the January FE/HE Prevent network meeting in Jan 2020.----</p> <p>---- All staff and contractors Enhanced DBS checked----</p> <p>---- External Lettings are supervised as authorised visitors until Enhanced DBS clearances are obtained.----</p>	5	2	10R	<p>Ensure all staff are familiar with processes for visitors accessing the College</p> <p>Development and implementation of rolling cross-organisation training plan to increase organisational awareness.</p> <p>Ensure safeguarding leads complete regular updates in all aspects of safeguarding including Prevent.</p> <p>Work towards centralising the enhanced DBS and training records for all staff and contractors.</p>	Ongoing	VPQE	
										Ongoing	DPC	
										Ongoing	VPQE	
										05/10/20	VPQE & DPC	08/11/20

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3	<p><b>IT Systems</b></p> <p>What filtering/firewall systems are in place to prevent individuals from accessing extremist websites?</p> <p>Have they been tested recently, are the filtering systems up to date?</p> <p>Do they alert you if someone tries to access extremist sites, do you know what to do if someone does?</p>	3	4	12	<p>---- UCG has dual Firewall installations. The Palo Alto Firewall which includes web filtering software. The other is a checkpoint firewall plus a separate application for web filtering called IBOSS. Lanscool is installed on many classroom machines.----</p> <p>---- Web filters updated daily. IT Dept periodically test specific websites for firewall penetration.----</p> <p>---- Alerts generated automatically by the systems detailed above. When an alert is generated IT staff understand what terrorist/extremist material looks like and are confident to share concerns through the appropriate process if they do encounter access to this material.----</p> <p>---- Students and staff understand the risks attached to accessing terrorist and extremist material online and understand the institution's duty and process in these areas.----</p>	3	2	6G	IT Team update on alert process & escalation.	06/09/21	IT Services Manager & Head of Technical Services
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4	<p><b>Campus Security</b> Are students/staff challenged if they are not wearing ID</p> <p>How are authorised visitors managed?</p> <p>How do you identify/stop unauthorised visitors</p> <p>How do you restrict access to the campus i.e. swipe, code entry</p>	5	4	20	<p>---All students and staff challenged to produce and wear ID at the turnstiles. Students regularly challenged to display ID by staff in the corridors.---</p> <p>---Authorised visitors checked in at Reception and accompanied when entering the turnstiles. This process is managed and supervised by the Customer Service Team, the Student Advice &amp; Enrolment Team and the Security Team. Visitors parking is contained and also requires the visitor to book in at Reception, this process is managed by the Security Team.---</p> <p>---UCG has staff &amp; student swipe card access via turnstiles on all campuses. Student pictures display on a screen at security to identify behaviours like “double tapping”.---</p> <p>---CCTV is monitored by the Security Team to assist in monitoring access control. Car parks are operated by either remote electronic barriers or a manned security presence. There is a strict no ID no access policy.---</p> <p>---Access to classrooms and offices are mixed between swipe card access and key management. Keys are signed out daily and secured by the Security Team. ID card access to specific areas facilitated by permissions from the IT Teams.---</p>	5	2	10R	<p>Ensure all staff have the confidence to challenge students not abiding by the student code of conduct.</p> <p>Ensure all staff are familiar with processes for visitors accessing the College.</p>	<p>Ongoing</p> <p>To be reviewed post Lockdown</p>	<p>VPQE &amp; Head of Security &amp; Head of Estates &amp; Estates Manager &amp; AP-SSS</p>
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5	<b>Literature/posters-</b> Does permission have to be granted for people to distribute leaflets? Do people know who to contact if they come across extremist literature? Do they know what extremist literature looks like? What happens if individuals are handing out leaflets outside the institution?	3	3	9	---Leaflets are restricted from distribution within the campuses without specific authority of the Senior Leadership Team.--- ---Students encouraged to report any extremism concerns to staff. Staff aware of extremism material through their Prevent training and understand the reporting process.--- ---Safeguarding posters and team information including pictures are available sporadically across campuses to signpost anyone with any concerns to those services.--- ---Security and/or Senior Leadership can attend to attempt to move persons on if leaflet distributing externally. If unsuccessful UCG has close direct contact with Police partners and borough Prevent Leads.---	3	2	6G	Annual review or posters to ensure relevancy and updated guidance on local and national initiatives.	Ongoing	HMSC & AP-SSS & Head of Estates & Estates Manager	
6	<b>Funding &amp; resources-</b> Do you fund community/voluntary/student groups? How do you know that monies are not funding extremist activities? Do student/external groups book your rooms, how do you monitor if extremist activities are taking place? Do you have a booking form/policy that states extremist activities must not take place?	4	4	16	---No funding provided to community/voluntary/student groups.--- ---Internal & External persons can book rooms via the Lettings Dept. All Lettings activity vetted by the UCG Lettings Manager. Enhanced DBS checks along with Safeguarding, Prevent & H&S training required for long term or regular lettings during core hours.--- ---Student events and activities organised and supervised by the Student Enrichment Team.--- --	4	1	4	Investigate appropriate wording to place on Lettings Booking forms stating restrictions on activities deemed a risk to our Safeguarding & Prevent policies.	01/09/20	Lettings Manager	21/05/20

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7	<b>Safe place to discuss terrorism and extremism –</b> Are staff trained to facilitate discussions on terrorism and extremism? Are there opportunities available to do this i.e. do you run a program of seminars? Can external speakers be invited to discuss Prevent? Are students given the skills to challenge extremist narratives?	3	3	9	---All staff trained on Prevent (see section 1)--- ---External speakers are invited to discuss Prevent related issues and are recommended by authorised partners. All speakers monitored by the Student Enrichment Team and speakers scheduled during student break time to facilitate the best attendance.--- ---British values promoted generously cross campus and discussion encouraged in class when covering specific topics.--- ---Student training provided on Prevent.---	3	2	6G	Further staff specific training on facilitating discussion  Student training required to challenge extremist narratives. Training to be provided in line with changing local priorities.	Ongoing  30/03/21	DPC  DPC	
8	<b>Policies &amp; Procedures -</b>  What policies need to change to incorporate Prevent (safeguarding, security & estate management, disciplinary, behaviour, room booking, external speakers)	4	4	16	---Revised Information leaflet for contractors/external speakers has been agreed by facilities team.--- ---This policy updated to reflect London FE Prevent best practice. Policy shared with local prevent co-ordinators.--- ---Central record required to track Prevent referrals.---	4	1	4	Safeguarding Policy and Prevent Risk Assessment to be reviewed/updated annually  Revised policy to UCG safeguarding Steering group meeting  “My concern” being introduced	Ongoing  Ongoing  30/09/20	VPQE & Prevent Lead  VPQE  VPQE	01/0920

		VU	U	PO	PR	NC
Consequence	5	5Y	10R	15	20	25
	4	4	8	12	16	20
	3	3	6G	9	12	15R
	2	2	4	6Y	8	10Y
	1	1	2	3	4	5G
		1	2	3	4	5
Likelihood						

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9	<b>Information Sharing</b>  Are there information sharing protocols in place with the Police and the council? Do the Police know who to contact for any issues? Do the college know who to contact at the Police? Do other staff members know who the Prevent lead is at the college?	4	3	12	----There are no information sharing agreements in place. Information shared on a case-by-case basis. (Completed) ----UCG has dedicated Safer Schools Police Officers and the Police are in regular contact with the Safeguarding Teams. ----Head of Security maintains contact with the local Counter Terrorism Security Office for Wembley Campus, which is located in a high-risk crowded space environment. ----Information and best practice shared in the Wembley Business Security Forum. ----Regular contact maintained with local Safer Neighbourhood Teams. ----Local business owners encouraged to contact the college to report student behaviour	4	2	8	Maintain good links with external agencies.	Ongoing	VPQE & Head of Security/ Prevent Lead & Head of Estates & AP-SSS & DPO
10	<b>Local Prevent Structures</b>  Are you linked in with the local Prevent Board or regional Prevent FE/HE group Do you know who your local authority Prevent Co-ordinator is? Awareness of key Police and regional HE/FE lead?	3	4	12	----College is an active member of London & Brent FE/HE prevent networks, which are key sources of information. ----Regular contact with the DFE London FE Prevent Co-Ordinator and the Brent Prevent Co-Ordinator ----UCG represented on Local Safeguarding Partnership Boards and Safer Neighbourhood Forums. ----The College has established links to Integrated Gangs and Anti-Social behaviour support units, where people of concern in communities are discussed, people of concern can be matched against enrolments and appropriate safeguarding strategies applied. - ---SO15 Police accessed via the Prevent Co-ordinators.	3	1	3	Maintain partnerships & links  Continue to report to Safeguarding Committee's	Ongoing  Ongoing	Prevent Lead

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11	<p><b>Tensions</b></p> <p>Are you aware of tensions in your student body? How are you dealing with these tensions? Have these tensions been exploited by any group? What cohesion issues do you have?</p>	5	5	25	<p>---The Security Team and Duty Managers monitor and respond to student incidents. Escalation is cascaded to the faculties for disciplinary action.---</p> <p>---Any causes for concern with gangs, large groups or ethnicity-based tensions are quickly identified and discussed in a multi-staff Student Incident Panel. Appropriate resolutions defined within the group. The group consists of Security, Student Enrichment, Leadership, Faculty Heads and Teachers if necessary. Student Council members could also be invited to share knowledge and ideas for resolution.---</p> <p>---Campuses are located in known gang territories. Liaison with Safer Schools Police Officers and external bodies like the probation service to identify vulnerable students. Safeguarding Team record incidents and receives good intelligence from students regarding gang members on campus. Knife wandering is a regular occurrence cross campus operated by the security team in partnership with student enrichment. Male and female officers and staff available. Clear guidelines are on display regarding wandering and the consequences for carrying knives.---</p> <p>---Posters on display on campus to attempt to deter students from knife crime. Strong county lines intelligence from the Police regarding students when appropriate.---</p>	5	2	10R	<p>Continuous assessment of national, local and campus wide concerns and incidents.</p> <p>Maintain close working relationships and information sharing with Safer Schools Police.</p>	<p>Ongoing</p> <p>Ongoing</p>	<p>Prevent Lead/ HSec &amp; VPQE &amp; Head of Estates &amp; Estates Manager &amp; APSSS</p> <p>Prevent Lead/ HSec &amp; VPQE</p>
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12	<b>Prevent Messaging</b> How can Prevent be communicated better? i.e. posters, newsletters, intranet, student and staff handbooks, staff induction, internal literature  Covid19 updates	3	3	9	---Safeguarding & Prevent delivered at staff and student inductions.--- ---Posters displayed throughout campuses promoting Prevent.--- ---Prevent information & literature available on the staff intranet and student Moodle network.--- ---Teaching material distributed to better integrate British Values into teaching and learning along with online safety guidance. Additional Prevent staying safe online advice posted online CNWL & CWC websites.---	3	2	6G	Maintain and review posters annually.  Ensure UCG messaging is up to date with current guidelines.  Assess which material from foundation learning to distribute to teaching staff.	Ongoing  Ongoing  Ongoing	VPQE  HMSC & AP-SSS  HoQE	27/04/20
13	<b>Engagement with Student Union</b> Does the union have an awareness of Prevent? Are they aware of the risks? Do they have a student support service?	3	3	9	---Student training provided on Prevent.--- ---Student Union/Council work in direct partnership with the Student Enrichment Team.--- ---Students engaged regularly on complex issues, an example would be the use and monitoring of the Quiet Room.---	3	2	6G	Student Union/Council training required to challenge extremist narratives. Brent funded material not available.	30/03/21	VPQE & AP-SSS	
14	<b>Freedom of Speech</b> Have you revised and enhanced Codes of Practice on Freedom of Speech? Developed clearer guidelines on balancing freedom speech with the need to protect vulnerable individuals?	3	3	9	---Students and learners have good critical engagement skills and understand how to verify information online and the reasons why they should.--- ---Students and learners feel comfortable sharing any concerns they have about behaviour or information in the online space, especially regarding freedom of speech.--- ---All are aware of their individual responsibilities in the online space, especially regarding freedom of speech.---	3	2	6G	Tutorial activities (including on-line learning activities embedded in the tutorial year plan), distributed to teaching staff in September 2019.	Ongoing	VPQE	
15	<b>Policy on external speakers</b> Do you have a risk assessment framework for dealing with requests for external speakers on campus	3	3	9	---Student events, speakers and activities organised and supervised by the Student Enrichment Team.--- ---External speakers referred via police, prevent or safeguarding networks.---	3	2	6G	Risk Assessments required for external speaker events	06/09/21	AP SSS	

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16	<b>Staff and volunteers</b> Are you vigilant to staff members and volunteers potentially radicalising students? Do you have policies and procedures that can handle this?	4	3	12	---Lesson observations conducted by Managers, external Consultants and other partners like Ofsted. All consultants are trained inspectors and experienced in recognising radicalising.--- ---Policy in place “staff code of professional conduct” detailing professional standards.--- ---Referrals taking place by staff without the knowledge of the Safeguarding team or Prevent Lead---	4	2	8	Staff to be contacted and offered additional training if required.	Ongoing	VPQE	
17	<b>Dangerous Substances</b> Is the institution aware of and comply with all relevant legislation in the storage and handling of dangerous substances including chemicals, bacteria, viruses and toxins?	5	3	15	---UCG COSHH Risk Register, COSHH Risk Assessment and policy all available on the portal. COSHH data sheets available at chemical storage locations cross campus. Individual Risk Assessments available for all lab areas including methods for controlling and storing substances. Appropriate staff trained in safe handling of substances and PPE supplied as appropriate.---	4	2	8	Update COSHH Risk Register to reflect UCG with mention to specific campuses.  Regularly review specific UCG Risk Assessments for storage of chemicals.  Ensure annual observations of high-risk COSHH storage locations take place.	05/04/21  Ongoing  Ongoing	Head of Estates & Estates Manager & H&S Advisor	

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18	<p><b>Dealing with an incident</b></p> <p>Does your critical management plan identify a lead person to deal with terrorist related issues?</p> <p>How will you communicate with and reassure local communities, staff and students?</p> <p>Who will deal with the Press?</p> <p>How will you communicate with other FE/HE institutions locally?</p> <p>How will you identify what partnership support you may require?</p>	4	4	16	<p>---Local Communities: Physical letter detailing the organisational response to an incident, notices on websites and posts through social media.</p> <p>Staff: Internal Email and the line management system.</p> <p>Students: Email and communication through the Tutor System / Enrichment / Student Advisors.</p> <p>Parents: Email and a letter to the residence on record.---</p> <p>---Press will be centrally managed as detailed in the Continuity Plan, with a Gold Leader---</p> <p>---Inter-institution communication will be carried out by the Group Principal and CEO through the AoC Network.---</p> <p>---The Local Authority will provide a detailed plan of support they can provide through themselves or local partner organisations.---</p>	4	2	8	<p>Review critical incident documents for the group including critical response team and equipment.</p> <p>Standardise wording for Invac/Evac/Lockdown</p> <p>Review critical incident titles such as "Gold Leader" which can be easily confused with official Government &amp; Emergency Services critical incident titles like "Gold Commander". Consider removal of Gold/Silver/Bronze titles from UCG command structure.</p>	06/09/21	06/09/21	06/09/21	<p>Head of Estates &amp; Estates Manager &amp; Head of Security &amp; H&amp;S Advisor</p>
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19	<b>Covid 19 Update</b>	/	/	/	Target and completion dates for actions require review	/	/	/	Target and completion dates of all points to be reviewed and updated post Covid19 lockdown. Appropriate timing to be agreed with VPQE		GP & VPQoE	11/02/21
					National/Local priorities				Terror threat level decreased to 'Substantial' 04/02/21. FE/HE Prevent focusses on online safety & pastoral care functions during lockdown. Local priorities in nearly all London boroughs focus on Far-Right activity.	Ongoing, to be reviewed post lockdown		
					Changes to welfare/pastoral facilities				Maida Vale & Wembley Campuses closed during lockdown.			
					Learners are supported and welfare/pastoral functions are in place.				Support available remotely & via on campus DSO at Paddington & Willesden covering all group campus concerns. Out of hours support has been rostered. Students have been sent a support document covering the expectations on their conduct and support available on campus and remotely. A			
									The Safeguarding Team and the Safeguarding Steering Group continue to meet remotely to discuss concerns during lockdown.			

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