



Prevent Risk Assessment/Action Plan

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| Assessment undertaken by Prevent Leads | Laila Bentley (Primary Lead) Executive Director Student Services (EDSS) Peterborough College Phil Smith (Prevent Lead) and Sarah Young (VP) Stamford College Liz Knight (Secondary) Academic Director (AD) University Centre Peterborough |
| Internal/External Verification/ review | Internal: HE Academic Board / UCP Council External: David Layton-Scott (PREVENT Co-ordinator Eastern Region)- reviewed 20 th January 2020 |
| Date Undertaken | November 2019 and revised 1 st August 2020 |
| Update Undertaken | January 2020 |
| Next Annual review | November 2021 |

Who is this document for?

This document is intended for leaders, managers and governors; the intention of this document is to give advice, reassurance and guidance on how *Prevent* is being implemented within the University Centre Peterborough and its parent company, Inspire Education Group (IEG).

It will provide a framework on how to assess and deal with Prevent vulnerabilities at University Centre Peterborough and will have due regard to the need to prevent people being drawn into terrorism. It is informed by our locality via on-going updates from Chanel and our Eastern Region Prevent Coordinator. We work closely with stakeholder groups, faith agencies and educational settings to ensure that emerging and immediate threats are addressed.

Context

University Centre Peterborough is part of the Inspire Education Group (IEG). University Centre Peterborough (UCP) is the higher education arm of the Inspire Education Group (IEG). UCP was established in 2007 and previously operated as a joint venture with Anglia Ruskin University. UCP was registered with the Office for Students in 2019. On the 1st August the merger between Peterborough and New Stamford College took place and IEG was formed. From 1st August 2020 all Peterborough College and Stamford College higher education provision and students transferred to UCP. HE provision at Stamford is referred to as UCP @ Stamford.



Teaching staff from the college deliver on the degree programmes. Therefore, to protect all students and to ensure currency of knowledge among staff UCP share training, infrastructure support and some welfare functions with IEG. Training, updates and guidance is therefore provided via the group and Safeguarding and Prevent Leads are in place. There are however distinct HE policies, a Student Charter and regulations which also reference and identify the Prevent agenda. In addition, the 2020/2021 terms and conditions for students explicitly reference the Prevent agenda and these were approved at the HE Academic Board which includes student representation. Our Ethics processes and application form also identify areas of research which would be unsuitable due to the Prevent agenda. The ethics application process is presented in such a way that students understanding is enhanced as part of their learning.

Post 1st August this assessment and plan now includes UCP @ Stamford and should be read in conjunction with updated operating procedures submitted to the OfS in August. Training and HE updates will be provided by David Layton- Scott. All local referrals to Channel will follow existing procedures for each site – due to county and infrastructure. Sam Slack remains the operational contact for Stamford.



A. Background to Prevent

The Government Prevent Strategy published in 2011, is an integral part of the overall counter-terrorism strategy, CONTEST (2011, 2018). Its aim is to stop people becoming drawn into, promoting or supporting terrorism. Prevent will address all forms of terrorism but continue to prioritise according to the threat they pose to our national security. Preventing terrorism will mean challenging extremism (and non-violent) ideas that are also part of a terrorist's ideology. Prevent will also mean intervening to try to stop people moving from extremist groups or extremism into terrorist-related activity.

The three Prevent Objectives are:

- 1. Tackle the causes of radicalisation and respond to the ideological challenge of terrorism**
- 2. Safeguard and support those most at risk of radicalisation through early intervention, identifying them and offering support**
- 3. Enable those who have already engaged in terrorism to disengage and rehabilitate.**

B. The role of Higher Education

The Counter Terrorism and Security Act 2015 has placed the Prevent element of the national counter terrorism strategy on a statutory footing. This has implications for colleges and partner agencies and bodies, such as schools, universities and councils. Higher Education Prevent Duty Guidance was issued in September 2015 and an update is planned for 1st April 2021.

HE providers promote and facilitate the exchange of opinions and ideas and enable debate as well as learning to ensure freedom of speech. The Government has stated that it has no wish to limit or otherwise interfere with this free flow of ideas, and that it will be careful to balance the need to preserve national security with protecting civil liberties. Although it is vital that HE providers must protect academic freedom, it is a long-established principle that they also have a duty of care to their students. Societies and student groups have a clear and unambiguous role to play in helping to safeguard vulnerable adults from radicalisation and recruitment by terrorist organisations.

We accept that our settings within UCP and IEG can play an important role relating to the second Prevent objective. Just as we can help to educate people about risk, we offer opportunities to help learners understand the risks associated with extremism and help develop the knowledge and skills to be able to challenge terrorist ideologies.

Key staff in UCP and IEG, work in partnership with other local agencies, are well placed to identify needs and support the welfare of individual students who may be particularly vulnerable.

C. Pursue

There are other elements within the Government's counter terrorism strategy which focus on pursuing and disrupting terrorists, this is titled Pursue. This is not the role of 'Prevent', which operates in what is called the 'non-criminal space' similar to other preventative initiatives that protect and safeguard vulnerable individuals at risk of being drawn into harms such as drugs, gang culture and gun and knife crime.

D. Support available for people at risk of becoming involved in extremism

Channel is a multi-agency support scheme that offers help and guidance to people who may be at risk of becoming involved in extremism. Extremist organisations sometimes try to recruit people who are susceptible or vulnerable, in person or through the internet. If the early signs are spotted and acted upon, it safeguards the person concerned and helps protect all of us who live and work in the town.

Concerns that an individual may be vulnerable to radicalisation (grooming) does not mean that we think the person is a terrorist; it means that we are concerned that they are prone to being exploited by others.

It is important too that staff trust their professional judgement – if they are concerned that someone is at risk of getting involved in extremism, they should in the first instance contact the Safeguarding Team who should, if required, contact their Channel Co-ordinator. They will, in partnership with other safeguarding professionals, investigate further to assess the nature and extent of the risk and the Channel programme will develop the most appropriate support package for the individual concerned.

E. Multi Agency Support and Guidance

UCP and IEG has representation on the Channel Board and the local FE/HE Prevent Group. The IEG accesses up to date information and training from the local safeguarding boards, the regional FE/HE Prevent Coordinators and Channel. This supports the essential provision of Prevent Lead Training, monthly Prevent newsletters, along with regular updates relating to local and national incidents or threats and 'Official Sensitive' documents such as the quarterly Counter Terrorism Local Profile (CTLP). Access to this information allows for face-to-face safeguarding training, staff updates and the Prevent risk assessment and action plan to be informed by current data and risks. Online Prevent training is undertaken by all staff as a minimum requirement and is part of the induction programme for new staff.

Risk Scoring Matrix

| Impact | Probability | | | | |
|-------------------|-------------|--------------|--------------|------------|--------------------|
| | 1 – Rare | 2 – Unlikely | 3 – Possible | 4 – Likely | 5 – Almost Certain |
| 5 – Extreme | | 10 | 15 | 20 | 25 |
| 4 – Major | 4 | 8 | 12 | 16 | 20 |
| 3 – Moderate | 3 | 6 | 9 | 12 | 15 |
| 2 – Minor | 2 | 4 | 6 | 8 | 10 |
| 1 - Insignificant | 1 | 2 | 3 | 4 | 5 |

Rag Ratings



- Limited / No Progress
- On Track / on-going as planned
- Completed



| No | Vulnerability/Risk Area | Probability | Impact | Risk Scoring | Action taken/already in place to mitigate/address risk | Responsibility | Timescale | Progress RAG Rating | Commentary |
|----|---|-------------|--------|-----------------------|---|----------------|------------|-------------------------|--|
| 1 | Leadership | | | | | | | | |
| | <p>Insufficient understanding of their own and institutional responsibilities in relation to the "Prevent Duty".</p> <ul style="list-style-type: none"> UCP Council / Shadow Council Senior Leadership Team (SLT) Staff Safeguarding Team | 1 | 3 | 3 Very low | <ul style="list-style-type: none"> Safeguarding and WRAP/Prevent training provided to all new staff at induction. Safeguarding refreshers for all staff annually. Key themes promoted on SharePoint and through staff bulletin which reflect the local setting. Completion of training monitored. | AD/EDSHR/EDSS | March 2021 | | <p>Project Argus</p> <p>All governors to carry out mandatory online training. Safeguarding and Prevent online training planned for roll out across college for new staff to complete pre induction. Key themes to be addressed annually through CPD days.</p> <p>New online Safeguarding and Prevent training introduced for staff, all new staff to complete prior to starting/within first 2 weeks and linked to passing probation. Refresher Safeguarding training is now annual, using online training with additional face to face training and guidance.</p> |
| | | | | | <ul style="list-style-type: none"> Annual Safeguarding Report and action plan. Safeguarding Action Plan and Prevent Risk Assessment/Action Plan are monitored by the Executive Director Student Services and UCP Council / Shadow Council. | EDSS | April 2021 | | <p>Annual Safeguarding report reported to Board April 2021 including reference to radicalisation.</p> <p>Updated Policy and Action Plan shared with PRC C&Q Governors in June</p> <p>Advice and guidance taken from NACTSO in developing the business continuity plan</p> |



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| | | | | | <ul style="list-style-type: none"> Key staff WRAP 2/3 trained and Safeguarding team have WRAP trainers. | EDSS | Oct 2019 | | AD undertook OfS Prevent training on 28/2/20. |
| 2 | Partnership | | | | | | | | |
| | a) Ineffective engagement from the UCP Shadow/Council, SLT, managers and leaders. | 1 | 3 | 3 Very low | <ul style="list-style-type: none"> Corporation and SLT provided with updates. Other managers and leaders completed WRAP 2/3 training | EDSS | Ongoing | | |
| | b) Single point of contact (SPOC) not known or identified in relation to Prevent. | 1 | 3 | 3 Very low | <ul style="list-style-type: none"> The Prevent Lead for UCP & PRC is the EDSS. They are responsible for oversight of the Prevent Risk Assessment Plan and update, to SLT and Governors. | EDSS | Ongoing | | |
| | c) Insufficient and ineffective engagement with the BIS Regional Prevent Coordinator, Local Authority Police Prevent Leads and engagement with local Prevent Boards/Steering Groups at Strategic and Operational Level. | 1 | 3 | 3 Very low | <ul style="list-style-type: none"> The EDSS has robust links with the Cambridgeshire Prevent Team and Eastern Region Prevent Lead. They are a member of the Cambridgeshire and Peterborough Channel Panel and Missing and Criminal Exploitation Group. This ensures our policies, approach, training and educational focus addresses the local context. This understanding informs the development and review of this action plan. IEG Safeguarding Team are fully aware of the Channel referral process and know who to seek advice from and when. On site Police Constable | EDSS/WEM | Ongoing | | <p>East Region Counter Terrorism Local Profile quarterly publications (Official/Sensitive) sent quarterly to EDSS user security agreement updated for new post holder March 2019</p> <p>EDSS and Police Constable have access to E-CINS Prevent data/referrals</p> <p>WEM attends Peterborough Hate Crime group on quarterly basis and Regional Prevent Groups twice yearly</p> |

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| | | | | | <p>supports local intelligence sharing and referrals.</p> <ul style="list-style-type: none"> Local Education Prevent Plan for Peterborough schools shared annually. | | | | |
| 3 | Staff Training | | | | | | | | |
| | <p>Understand the factors that make people vulnerable to being drawn into terrorism and to challenge extremist ideas which are used by terrorist groups and can purport to legitimise terrorism.</p> | 2 | 4 | 8 Medium | <ul style="list-style-type: none"> Safeguarding Policy includes reference to radicalisation. WRAP training underlines complexities involved and Notice, Check, Share principles. Staff are clear that they must refer any concerns using the Safeguarding referral process. Area will remain flagged as 'Amber' as it is a constantly evolving landscape and requires continued vigilance. Staff training in Prevent which is monitored by HR. All staff required to have had Prevent (WRAP) training. New starters receive WRAP training delivered face to face at induction. ETF Prevent online training introduced for new starters to take prior to starting as part of the onboarding process. All Governors also undertake this online training as well as other 'hard to reach' staff e.g. invigilators and zero hours staff. | <p>EDSS</p> <p>EDHR</p> | <p>Ongoing</p> <p>Ongoing</p> | <p></p> | <p>All staff have undertaken Safeguarding refreshers and WRAP training.</p> <p>All staff supervising dissertations undertake appropriate ethics training to ensure research complies with statutory requirements.</p> <p>Review internal training now that EDSS and Safeguarding team have completed WRAP Train the Trainer course.</p> <p>Online Prevent training has been introduced for new staff to complete prior to commencing employment/ within first 2 weeks and linked to passing probation. Internal IEG / UCP communications and the sharing of concerns relating to extremism or radicalisation are coordinated effectively through the existing safeguarding team.</p> |



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| 4 | Welfare and Tutorial Support | | | | | | | | |
| | a) Inadequate arrangements and resources in place to provide pastoral care and welfare support as required by University Centre Peterborough. Staff need to know what measures are available to prevent people from becoming drawn into terrorism and how to challenge the extremist ideology and understand how to support those who may need it. | 1 | 4 | 4 Low | <ul style="list-style-type: none"> Trained and updated Student Wellbeing and Safeguarding Welfare Team work alongside UCP Student Support Team. University Centre Peterborough has engaged positively with the Workshop to Raise Awareness of Prevent (WRAP) to ensure all teaching staff and key support staff have the skills and knowledge to refer any concerns appropriately. The Safeguarding Team are now registered with the Home office as WRAP trainers Risk assessment process which assesses where and how students or staff may be at risk of being drawn into terrorism. | EDSS | Nov 2019 | | Review Prevent as part of tutorials and ensure all students are aware of their responsibility as identified in UCP policies. Ethics training for both staff and students includes guidance on good research / academic process and identifies through a RAG rating system any proposals that would be inappropriate. |
| | b) Insufficient checks on chaplaincy provision and how this contributes to the IEG student support services. | 1 | 1 | 1 Very low | <ul style="list-style-type: none"> Chaplaincy provision is provided and is part of the Student Wellbeing Team, monitored by WEM. Annual Self- Assessment for related areas. | EDSS/WEM | Nov 2019 | | No issues to date. |
| 5 | Speakers and Events | | | | | | | | |
| | Ineffective policy/framework for managing speaker requests. | 2 | 3 | 6 Low | <ul style="list-style-type: none"> External Speakers Policy UCP which acknowledges and navigates the full legislative framework All are aware of and adhere to both the venue booking and external speaker procedure. More controversial speakers require the authorisation from the Accountable Officer via the process outlined in policy P902. | UCP Academic Director | Apr 2020 | | <p>Process and policy in operation. Updated July 2019 and available on the UCP website. Policy Number P902 Academic Freedom & Freedom of Speech Policy.</p> <p>Audit of process and risk assessments planned in Semester 2 by AD. If no incidents in 2 years, review policy to ensure it is not too onerous or inappropriate</p> |



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| | | | | | <ul style="list-style-type: none"> The Organiser will also ensure that there is a named person allocated to attending the event to ensure that the event passes without incident. This person must be a member of staff or a current student and the Organiser should be confident that this individual understand how to deal with any issues that may arise during the event (e.g. if the event is attended by significantly more people than planned, or there is disruption caused by the audience etc.) UCP provides safe spaces for discussion and debate. | | | | |
| 6 | Safety On-line | | | | | | | | |
| | <p>a) Insufficient and ineffective policy relating to the use of IT which doesn't contain a specific reference and inclusion of the Prevent Duty.</p> <p>b) Ineffective filtering/firewall systems to prevent staff/students/visitors from accessing extremist websites and material.</p> | 1 | 4 | 4 Low | <ul style="list-style-type: none"> Clear policies in place for students and staff using IT equipment to research terrorism and counter terrorism in the course of their learning. Policy specifically references Prevent. Students receive information related to IT at Induction. | IM/DD | Ongoing | | <p>Policy in operation. Student IT code of conduct available in UCP Rules, Regulations and Procedures, within the student charter and student handbooks.</p> <p>These policies also relate to Students, Student Union members or staff attending events or contributing to discussions at events held offsite or online on behalf of UCP</p> |



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| | c) Insufficient coverage of the use of students using their own devices via Wi-Fi. | 1 | 4 | 4 Low | <ul style="list-style-type: none"> All personal devices are subject to the same level of filtering and restrictions when logged on to our Wi-Fi. | IM/DD | Ongoing | | EDSS reviewing existing internet use reporting software. E-Safe free trial to be explored Continue to monitor internet use and identify breaches of security via online using security software. It should be noted that students can request filtered sites to be unblocked if pertinent to their studies and not subject to Prevent. This process is monitored to ensure that levels of access for higher education students using an FE network are not onerous or restrictive for their degree studies. |
| | c) Failure to alert to serious and/or repeated breaches or attempted breaches of the policy. | 1 | 4 | 4 Low | <ul style="list-style-type: none"> Force point report monitored by the Lead Safeguarding Practitioner to alert any potential safeguarding concerns | LSP/EDSS | Ongoing | | |
| 7 | Multi-Faith Facilities | | | | | | | | |
| | Inadequate management procedures of the College Multi-faith facilities. | 2 | 3 | 6 Low | <ul style="list-style-type: none"> Multi-Faith Room located at IEG provided for all faiths and those with no faith. Expectations for usage clearly displayed/published. Policy for Contemplation Room in operation. Meetings and religious teaching are allowed only when they are supervised and run by one of the chaplains and overseen by the lead chaplain, no-one of any faith is excluded from joining these meetings whatever faith they are | EDSS/WEM | Ongoing | | Policy in operation. Process for recording usage of the room to be reviewed. Improved system in place for 19/20. |
| | | | | | | EDSS/WEM | Ongoing | | No issues of concern to date. |



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| | | | | | <p>and are regularly checked and monitored, and they are not closed groups and are open to anyone to join.</p> <ul style="list-style-type: none"> Safeguarding & Wellbeing staff ensure no denomination is able to dominate the space. This is monitored including random drop-ins by the Safeguarding & Wellbeing Team and/or Campus Coordinators. A Chaplaincy coffee morning is held in the atrium of UCP. Any 1:1 meetings are conducted appropriately and issues would be raised with the EDSS. | | | | |
| 8 | Site Security | | | | | | | | |
| | a) Ineffective arrangements in place to manage access to the site by visitors and non-students/staff. | 3 | 4 | 12 Medium | <ul style="list-style-type: none"> P430 Visitors Policy in place. P100 Access Control Policy in place. Entry at UCP is monitored by the UCP reception. Reception staff trained. Duty Manager and Duty Principal rota in place. All visitors have to sign in at Reception. Frequent visitors follow Visiting Associates procedure. All contractors are collected and met, badges issued by Reception. Agency staff through vetting check process with HR and Procurement Manager. Access approved once checks completed. | EDHR/DOE | Ongoing | | <p>Logged on central register</p> <p>Logged on central register</p> |



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| | b) Ineffective policy regarding the wearing of ID on site, which is not enforced. | 3 | 4 | 12 Medium | <ul style="list-style-type: none"> All visitors required to display ID. Staff /students expected to wear ID – is part of the Code of Conduct and staff/ students/visitors are subject to routine checks by Duty Principal | SLT | Ongoing | | Duty Management Rota in place. All staff responsible for challenging wearing of ID/Lanyards. |
| | c) Ineffective arrangements for the storage of dangerous substances on site. | 1 | 4 | 4 Low | <ul style="list-style-type: none"> There are effective measures in place to ensure that appropriate security and health and safety procedures are followed. | DOE | Ongoing | | All procedures followed. Health and Safety. Audits in operation. |
| | d) Insufficient external hire policy which complies with Prevent Duty. | 2 | 4 | 8 Medium | <ul style="list-style-type: none"> P119 Commercial Lettings Policy in place and Letting enquiries checklist | DOE | Aug 2017 | | From July 2019 no further booking for large external events. Future booking will relate to small events, existing approved contracts, UCP and those approved SLT. |
| 9 | Safeguarding | | | | | | | | |
| | a) Insufficient attention paid to the protection against the risk of radicalisation and extremism which is not included within Safeguarding and other relevant policies. | 1 | 3 | 3 Very low | <ul style="list-style-type: none"> Explicit in policy and information. All staff to continue to monitor and raise concerns of students at risk to the safeguarding lead(s) | EDSS | Annually | | Policy 820 Safeguarding children, young people and vulnerable adults Covers Prevent duty. Policy reviewed and updated September 2019. |
| | b) Safeguarding and Wellbeing staff do not receive additional and ongoing training to enable the effective understanding and handling of referrals relating to radicalisation and extremism. | 1 | 4 | 4 Very low | <ul style="list-style-type: none"> Regular communication and updates provided to Safeguarding and Wellbeing team from external partner and government information sharing. Local Safeguarding boards and Prevent Leads advise on training opportunities for staff to access. | EDSS | Ongoing | | Recent Home Office updates to Prevent online training completed by team Jan 2019. |



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| | c) UCP does not utilise Channel as a support mechanism in cases of radicalisation and extremism. | 1 | 4 | 4 Very low | <ul style="list-style-type: none"> Robust Chanel links maintained via PRC EDSS and referral processes. See section 2. | EDSS | Ongoing | | Safeguarding team are well briefed on Channel and have good links with local Prevent Officers. |
| | d) UCP is not easily able to refer cases to Channel. | 1 | 4 | 4 Very low | <ul style="list-style-type: none"> UCP has very good communication links with EDSS, Channel and Prevent staff. UCP is familiar with the referral process. | EDSS | Ongoing | | |
| | e) Safeguarding/Prevent concerns are not effectively logged and monitored. | 1 | 4 | 4 Very low | <ul style="list-style-type: none"> ProMonitor is used to log all Safeguarding concerns including those relating to extremism and radicalization. ProMonitor categorisation to includes reference to at risk of radicalisation and/or extremism. | EDSS | | | |
| 10 | Communication | | | | | | | | |
| | a) The UCP / College Prevent Lead and their role is not widely known across the institution. | 1 | 4 | 4 Very low | <ul style="list-style-type: none"> Safeguarding Team known, which includes the Prevent contacts | EDSS | Ongoing | | <p>All staff briefed during induction which includes local area threats/concerns.</p> <p>All staff and students receive additional training on ethics guidance to ensure compliance with Prevent whilst maintaining academic freedom.</p> <p>Jan/March 2019 updated partnership agreements due to new post holder.</p> |
| | b) Staff and students are not made aware of the Prevent Duty, current risks and appropriate activities in this area. | 2 | 3 | 6 Very low | <ul style="list-style-type: none"> All updated materials published and staff directed to them on Staff Intranet and UCP website. Regular updates from Prevent partners shared and cascaded with relevant staff including Safeguarding Team. | EDSS/WEM DoQ | Jun 2019 | | |
| | c) Information sharing protocols are not in place to facilitate information sharing with Prevent partners. | 3 | 4 | 12 Medium | <ul style="list-style-type: none"> East Region Counter Terrorism Local Profile quarterly publications (Official/Sensitive) sent quarterly to EDSS | EDSS | Ongoing | | |




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| | | | | | <ul style="list-style-type: none"> EDSS and Police Constable have access to E-CINS Prevent data/referrals | | | | |
| 11 | Incident Management | | | | | | | | |
| | <p>a) Ineffective critical incident management plan which is insufficient in dealing with terrorist related issues.</p> <p>b) Insufficient training and informed personnel identified to lead on the response to such an incident.</p> | 1 | 5 | 5 Very low | <ul style="list-style-type: none"> UCP adopts the IEG Business Continuity Plan which has been updated to clearly identify the procedure for managing major incidents Disaster Management Plan has been updated and refers to bomb threat/ rogue attack. SLT and Primary Response Team attended a table top exercise coordinated by NACTSO July 2019 | DP/DOE | Ongoing | | <p>Internal table top exercise planning required as recommended by Prevent Lead.</p> <p>Project Argus delivered to 60 managers and key frontline staff. Further training events planned.</p> <p>Run, Hide Tell communications to students will be included within inductions and tutorials from Sept 2019.</p> |
| | <p>c) Failure to understand the nature of such an incident and the response that may be required in terms of the media.</p> | 2 | 5 | 10 Very low | <ul style="list-style-type: none"> Marketing Manager will be the contact with the media as directed by the Accountable Officer. In the event of an incident, advice to be taken from the Police and Prevent Coordinators. | VP/MRM | Ongoing | | <p>Advice would be sought in any such event.</p> |
| 12 | Employers and Partners | | | | | | | | |
| | <p>a) Insufficient strategies to ensure that students on placements, internships with employers and charitable bodies have an understanding and comply with the Prevent Duty.</p> | 3 | 3 | 9 Medium | <ul style="list-style-type: none"> Prevent requirements and expectations added to Employer, Apprentice and Work placement leaflets which have been distributed to all employers and apprentices. Prevent and safeguarding checks form part of the routine questions asked by assessors when they | AD / WEM / GEPL | On going | | <p>Need to ensure that Prevent is highlighted with employers included within documentation sent to them which will be regularly reviewed.</p> |



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| | b) Insufficient checks by UCP to ensure that we do not inadvertently promote or fund terrorism and extremism. | 1 | 5 | 5 Very low | <p>meet with learners</p> <ul style="list-style-type: none"> • Work placement employers are provided with prevent information as part of their induction booklets and materials • Prevent compliance built into the partner contract and assessed as part of the quality reviews • Online training as mandatory for assessors and expectations for employers <ul style="list-style-type: none"> • Appropriate due diligence checks carried out | DP | Ongoing | | <p>Toolkits have been delivered to assessors, sub-contractors and subsidiary partners December 2018 and February 2019 and this is ongoing</p> <p>On line resources have been developed for apprentices, students on work placements and employers and distributed.</p> |
| 13 | Staff Recruitment | | | | | | | | |



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| | Insufficient safer recruitment processes which are not robust. | 1 | 4 | 4 Low | <ul style="list-style-type: none"> • Safer Recruitment Policy P515 in place and regularly updated in line with new guidance. • Line Manager handbook with links to online resources and guidance on safer recruitment • Line manager induction process covers safer recruitment • Training in safer recruitment – online training is mandatory for managers, as well as face to face update training delivered by HR • Bank of interview templates and standard interview questions include safeguarding • Robust process for DBS checks for all staff and Governors. DBS compliant following recent audit. Single Central Record kept up to date and recently audited. DBS Policy and risk assessment process in place. | EDHR EDHR EDHR EDHR EDHR | Ongoing | | Polices are in place and reviewed bi-annually or more frequently in line with developments in legislation and good practice. Line manager handbook and training for managers and online training in safer recruitment. |
| 14 | Educational Trips & Visits | | | | | | | | |
| | Increased risk of being caught up/victim of terrorist related incident. | 1 | 5 | 5 | <ul style="list-style-type: none"> • Education Visit P406, policy and procedure and clear flow chart in place • H&S Officer oversees procedure and checks • Educational visits documentation is reviewed for each trip. • Curriculum Leaders and HE Managers / Academic Director ensure thorough risk assessments are carried out along with essential trip information, schedule and emergency contacts for 2 people. | AD/DOE/APC/HEM | Ongoing | | Online educational trips system being reviewed. Feb 2019 Educational visits have reverted back to paper version. Training required to be delivered by HSO to DP's. Rolled out to curriculum August 2019 and subsequent updates issued. |

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| | | | | | <ul style="list-style-type: none"> • Consideration of destination and trip details at pre trip agreement stage. • Home Office Travel Advice sought prior to any international trips and visits. • SLT on call 24/7 in case of an emergency and have access to all trip information • 'Act of Terrorism – large events or big cities risk assessment for trips within this scope | | | | |

Definitions

- An ideology is a set of beliefs.
- Radicalisation is the process by which a person comes to support terrorism and forms of extremism leading to terrorism.
- Safeguarding is the process of protecting vulnerable people, whether from crime, other forms of abuse or from being drawn into terrorism-related activity.
- Terrorism is an action that endangers or causes serious violence, damage or disruption and is intended to influence the Government or to intimidate the public and is made with the intention of advancing a Political, religious or ideological cause.
- Vulnerability describes factors and characteristics associated with being susceptible to radicalisation.
- Extremism is 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. Calls for the death of British armed forces is also included.
- Freedom of Speech - UCP is committed to safeguarding freedom of speech and upholding academic freedom of enquiry in its teaching, research and associated activities. We will also ensure that the duty is balanced against our fundamental commitment to academic freedom and freedom of speech and other key legislation such as the Counter-Terrorism and Security Act 2015 (and associated Prevent Agenda), Equality Act and the Human Rights Act. UCP endorses and adopts the principles of freedom of speech within the law under Section 43 of the Education Act (1986) and expression of open discussion in compliance with the policy and procedure outlined in this document. Free and open debate of often controversial subjects is a key element of University life, and we will always seek to allow events to go ahead providing that they are within the law.
- EDHR – Executive Director HR
- AD – Academic Director
- EDSS – Executive Director Student Services(receives CTLP quarterly reports and will share as appropriate and undertake updates as appropriate to ensure all policies , processes and this document reflects and is informed by the local context)
- VP - Vice Principal
- WEM – Wellbeing and Enrichment Manager
- SLT – Senior Leadership Team
- DoQ – Director of Quality



- HSO – Health and Safety Officer
- IM – IT Manager
- DD – Deputy Director
- LSP – Lead Safeguarding Practitioner
- DOE – Director of Estates
- MRM – Marketing and Recruitment Manager
- GEPL - Graduate Employability and Progression Lead
- APC – Assistant Principal Curriculum
- HEM – HE Manager