POLICY

Prevent Strategy, Risk Assessment & Action Plan

Owner:

The Chief Operating Officer

THE COLLEGE OF HEALTH

Document Control

Reference: COH-HR-141
Status: Operational
Classification: Confidential
Issue No.: 4.0
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Prevent Strategy, Risk Assessment & Action Plan

Overview

The College of Health is a small specialist provider of Chiropractic education through the McTimoney College of Chiropractic with a student body of approximately 400 students. Its main teaching centre is in Abingdon, outside Oxford, together with a satellite centre in Central Manchester. The student body comprises a mixture of full and part time domestic students together with a small cohort of international students.

The Prevent Duty

Introduction

1. The Counter-Terrorism and Security Act 2015 seeks to place a duty (the Prevent Duty) on specified authorities including schools, colleges and universities to 'have due regard, in the exercise of its functions, to the need to prevent people from being drawn into terrorism'. The Act covers all forms of terrorism, including far right extremism and some aspects of non-violent extremism.

2. The Prevent Duty seeks to:

   - Combat the ideological threat of terrorism
   - Provide practical help to prevent people from being drawn into terrorism and ensure they are given appropriate advice and support.
   - Work with a wide range of sectors (including education, criminal justice, faith, charities, online and health) to prevent radicalisation.

3. The College promotes a culture of safety and respect for its students, staff, management, the Governing Body Board of Directors and visitors. As part of this ethos the College has considered the Prevent Duty and the importance of collaborative working between College staff, local authorities, police, other educational institutions, policy makers and health providers to safeguard its students and staff.

4. The Prevent Duty requires higher education institutions to:

   - **Governing Body Board of Directors Oversight:** Ensure the Governing Body Board of Directors maintains oversight of the approach to Prevent through standing agenda items on the College's Governing Body Board of Directors, the Academic Council and the Management Committee meetings;

   - **Partnership**: Work in partnership with government bodies, the police, BIS and prevent coordinators as well as local community representatives and support services;

   - **Risk Assessment & Action Plan**: Have in place an action plan to mitigate identified risks and

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perform, as a minimum, an annual update of the College's Prevent Risk Assessment and associated Action Plan to coincide with the annual OfS Prevent return;

- **Staff & Student Training**: Have in place staff & student training to raise awareness of the Prevent Duty and to enable them to support students;
- **Events:** Have policies in place to safeguard College facilitated events which involve an external speaker;
- **Support**: Provide Welfare, pastoral and student support where required.
- **IT**: Ensure adherence to the College's Acceptable Use IT Policy for the use of information technology by students, staff and visitors and for the use of research in curriculum areas.
- **Review**: Have in place appropriate measures to regularly review the approach to the Prevent Strategy at least annually

Objectives

5.   The Objectives of the College's Prevent Strategy are to:

- Set a strategy, objectives and an action plan to achieve the Prevent Duty.
- Promote, implement and monitor the College's responsibilities under the Prevent Duty.
- Have due regard to the College's responsibilities under its Freedom of Expression Policy and its Academic Freedom Policy.
- Ensure student and staff safety.
- Ensure that the College promotes a culture of non-bullying, non-harassment and nondiscrimination.
- Provide support for students who may be at risk, and develop appropriate sources of advice and guidance.
- Ensure that students and staff are aware of their roles and responsibilities in preventing violent extremism and radicalisation.

Systems

6.   The College recognises that the prevention of radicalisation is best placed within the wider welfare policies and procedures of the College. In doing so the information that may indicate that a person has become subject to radicalisation may best be collated and evaluated.

Prevent Safeguarding Ethos

7.   The College is committed to safeguarding its learners and staff and aims to protect children and adults at risk from abuse and harm. The College's ethos is to ensure the welfare and safety of staff, students and visitors to the College.

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8. The College has a statutory and moral duty to ensure that the College functions with a view to safeguarding and promoting the welfare of children and adults whilst receiving education and training at the College.

9. The Governing Body Board of Directors recognises that some adults are also vulnerable to abuse. Therefore, the College's safeguarding and child protection procedures may be applied (with appropriate adaptations) to allegations of abuse and to the protection of adults at risk as well as children.

10. The Prevent Strategy sits alongside the Safeguarding Policy and procedures of the College.

11. The College will engage with external agencies to ensure that it is well informed about the Prevent agenda at both a local and national level.

Governing Body Board of Directors & Senior Management Oversight

12. The Governing Body will retain close oversight and monitoring of the College's Prevent strategy

13. The Executive owner for the Prevent Strategy is the Chief Operating Officer, Matt Green whose responsibility includes maintaining links with external partners.

14. The ongoing progress with implementing the College's Prevent strategy will be monitored through a standing agenda item on the Governing Body Board of Directors, the Academic Council, the Management Committee and the Student Experience Committee

Students

15. Students will be engaged with regularly and receive regular training and information in order to inform them of, and raise their awareness of, the Prevent agenda as part of their induction and ongoing support. This will be coordinated by the Prevent Lead at the College. This is will be reinforced by the Safeguarding Lead and through the Welfare, Pastoral and Student Support provided to students.

16. Information of the Prevent Agenda and Duty will be promoted to students by inclusion in:
    - Curriculum offer, lesson planning and schemes of work
    - Posters
    - Prevent policy and procedures
    - On line induction information
    - Training and development sessions

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Staff

17. Staff will receive awareness training and guidance on how to deal with:

    - Inappropriate material and behaviours
    - Disclosures by learners about their exposure to extremist actions, views or materials
    - Accessing extremist material on line
    - Parental or peer concerns
    - Intolerance of difference
    - Anti-Western or Anti-British views

18. The College will ensure that all staff are familiar with the Prevent agenda, are able to understand how they can recognise indicative behaviours in students and colleagues and are aware of the course of action to take if they are concerned.

19. Members of the Governing Body Board of Directors and Academic Council receive updates on safeguarding and child protection matters which include the Prevent agenda. Directors take a proactive role in the Prevent Strategy and receive training and regular reports from the Prevent Lead.

Welfare, Pastoral & Student Support

20. The College offers a wide range of Welfare, Pastoral and Student Support to students through a wide range of support mechanisms which include a Personal Tutor system, Student Representative network, Student Support function, Learning Resource function and access to a counselor.

21. Staff and students are reminded that they can seek more information regarding the range of Welfare, Pastoral & Student Support available by contacting the College's Student Support Team.

22. Whilst the College does not have dedicated chaplaincy provision, staff and students are able to make use of a quiet space for prayer and reflection at our Oxford centre and are signposted to local facilities at our Manchester centre.

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IT Acceptable Use

23. The College expects (which is addressed during induction) all users of its IT provision and network, including students, staff and visitors to adhere to the College's IT Acceptable Use policy which includes reference to Prevent and a copy of this policy is available on the VLE.

Events Involving External Speakers

24. The College may from time-to-time host events which involve external speakers which can be

   - Onsite events
   - Offsite events
   - Online events

25. In each case of an event involving an external speaker, the staff member responsible for coordinating the event must follow the External Event Speaker Policy procedure, as laid out in the College's Governance & Academic Regulations Handbook, to seek the necessary permissions. Details of this policy and the forms for completion are available on the College VLE.

Partnership

26. The College will continue to develop links with external partners in order to remain aware of developments within the Prevent, safeguarding and child protection arena.

27. Links with relevant external agencies will be further developed through the College Prevent Lead

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Internal Referral Procedure

28. College staff should be aware of signs of radicalisation and have the confidence to report their concerns to their Line Manager.

29. The line manager should then inform the College Prevent Lead, who will discuss the matter with other Senior Managers and external agencies as necessary.

College Prevent Lead & Executive Owner:	Matt Green
Contact Number:	07411 183702
Contact Email:	prevent@collegeofhealth.uk

30. The College Prevent Lead will decide what action is necessary which will include a discussion with the College's DfE Regional Prevent Co-Ordinator and the Local Authority. This discussion may be for advice purposes or for a referral.

31. In the event of an emergency where there is an immediate risk of harm, staff should call 999 together with informing the onsite Facilities Team.

External Referral Procedure

All external referrals must be made through the College Prevent Lead via the College's DfE Regional Prevent Co-ordinator.

For matters in relation to the Oxford campus:

> DfE Regional Prevent Co-ordinator: SHERIYAR, Alamgir

> Phone: 07468 714372

> Email: Alamgir.SHERIYAR@education.gov.uk

For matters in relation to the Manchester campus:

> DfE Regional Prevent Co-ordinator: LUND, Nigel

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Phone: 07384452146

Email: nigel.lund@education.gov.uk

CHANNEL Procedure

32. The Police Authority has a CHANNEL procedure in place. The Police CHANNEL procedure is a partnership focused structure aimed at supporting those most at risk of being drawn into violent extremism, diverting people away from potential threat at an early stage, which prevents them from being drawn into criminal activity.

33. Partnership involvement ensures that vulnerable individuals have access to a wide range of support from diversionary activities through to providing access to specific services such as education, housing and employment. Each multi-agency panel varies according to local circumstances but partners (who are all signed up to an Information Sharing Protocol) can include:

   - Statutory partners such as education, NHS, probation, housing and the police service
   - Social Care
   - Children's services (e.g., Common Assessment Framework coordinators)
   - Youth offending services
   - Credible and reliable members of the community

34. The College will engage in the CHANNEL process as necessary and staff shouldl contact the College Prevent Lead should they have any concerns about a student, member of staff or visitor.

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Prevent Risk Assessment & Action Plan

Likelihood of occurring (LH)	Score	Severity (SV)	Score
Almost certain	5	Catastrophic	5
Very likely	4	Major	4
Likely	3	Moderate	3
Unlikely	2	Minor	2
Improbable	1	None or trivial	1

Risk	Comments & Risk Scoring	Proposed Action	By when	By whom	Impact of Action	Achieved Y/N	Date Achieved
Online Safety	The College acknowledges the danger that the accessibility of inappropriate online content can pose and will ensure vigilance and the necessary checks and measures are deployed to monitor this. **LH 2 x SV 5 = Risk Score 10**	Ensure all users of College IT systems have attention drawn to and are aware of the IT Acceptable Use policy both during induction, welcome back sessions and listed on the College VLE. Maintenance of IT network firewall filters and monitoring software Incorporate the importance of online safety into student induction, welcome back sessions and student information resources on the VLE.	Ongoing	Emma Brown (Student Support Manager) John Stilwell (Facilities Manager) Emma Brown (Student Support Manager)	Existing and new Students, together with staff, fully versed in what is and isn't acceptable us of the College IT Network. Checks and monitoring measures in place to identify inappropriate use of the IT Network Clear information available on the VLE to ensure students remain aware of Prevent	Ongoing Ongoing Ongoing	Ongoing Ongoing Ongoing

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Leadership & Management Governance Oversight	The Governing Body, together with its Executive lead, acknowledge the importance of continued governance oversight of the Prevent Duty. The College is committed to embedding the prevent agenda at all levels of the institution. **LH 1 x SV 1 = Risk Score 1**	Continue to provide Directors of the Governing body with a sound understanding of, and any updates to, the Prevent Duty and how they can contribute and monitor.	Ongoing	Matt Green (COO)	To provide Directors of the Governing Body with the information and confidence to challenge managers and staff on how the College is fulfilling its Prevent Duty and to ensure Executive oversight and accountability.	Ongoing	Ongoing
		Inclusion of the Prevent Duty as a standing item on the agenda of the Governing Body Board of Directors, Management Committee and Staff Student Experience Committee.			To ensure the Prevent Duty is discussed and monitored at all levels of the College.	Complete	Complete
		College's Prevent Lead to attend seminars and to receive briefings and information as required regarding Prevent.			To understand the Prevent Duty to establish the necessary policies, procedures and training throughout the college.	Ongoing	Ongoing
					To monitor and take the relevant action with regards to the expected implementation of the Protect Duty with regard to premises security.	Ongoing	Ongoing
Partnership	To continue to develop our partnership	To continue to build our networks	Ongoing	Emma Brown	Gain access to the latest best	Ongoing	Ongoing

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	network and to have the opportunity to share best practice. **LH 2 x SV 3 = Risk Score 6**	though the DfE Regional Prevent co-ordinators Sheri Alamgir & Nigel Lund for our respective Oxford and Manchester centres.		(Student Support Manager)	practice approaches, local risks and to reflect these back into the College's policies and procedures.		
Staff Training & Awareness	The College of Health is committed to ensuring existing and new staff continue to receive the necessary information and training regarding Prevent to ensure they are aware of the College's obligations and how to identify early signs of extremism and radicalisation in students. **LH 1 x SV 5 = Risk Score 5**	Provision for ongoing refresher staff training through academic staff meetings and staff away days.	Annually	Emma Brown (Student Support Manager) in liaison with Cathy Coombes (HR Lead)	Reinforce awareness of Prevent commitments including awareness of Prevent commitments and that all External Speakers are vetted before participation in onsite, offsite or online events.	Ongoing	Ongoing
		Ensure staff recruitment and selection and induction procedures inform prospective and new employees of the Prevent Duty, the College's stance and their responsibilities.	Ongoing	Emma Brown (Student Support Manager) in liaison with Cathy Coombes (HR Lead)	Applicants and new staff aware of Prevent within all recruitment and induction documentation and activities	Ongoing	Ongoing
Student Training & Consultation	The College of Health is committed to ensuring existing and new students continue to receive the necessary information and training regarding Prevent to ensure they are aware of the College's obligations, what constitutes	Provide opportunity for student discussion and consultation by inclusion of the Prevent Agenda in student induction, welcome back sessions and as a standing item on the Student Experience Committee.	Ongoing	Programme Leads & Programme Administrators	Develop an open culture in respect of extremism.	Ongoing	Ongoing

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unacceptable behaviour and how students can identify and report early signs of inappropriate behaviour. The College acknowledges the geographic and demographic differences in the Oxford and Manchester centres. **LH 2 x SV 4 = Risk Score 8**	Include Prevent on College wide posters	Ongoing	Emma Brown (Student Support Manager)	Provide awareness of extremism and staff contacts for students, together with visitors, governors and staff.	Ongoing	Ongoing	
					Ongoing	Ongoing	
	Ensure that VLE reflects the College's safeguarding culture including Prevent.	Ongoing	Vanessa Davidson (VLE Lead)	Comprehensive information and online training materials easily and readily available in relation to Prevent and the College's wider Safeguarding ethos	Ongoing	Ongoing	
	Ensure students are aware of reporting procedures if a concern arises.	Ongoing	Emma Brown (Student Support Manager) Matt Green (COO)	Individuals know how to report concerns.	Ongoing	Ongoing	
	Continue to raise student awareness of the Prevent Agenda through College promotions and online tutorials.	Ongoing	Emma Brown (Student Support Manager)	Students to recongise signs of extremism and radicalisation in themselves and others	Ongoing	Ongoing	

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		Regularly inform students of the process for seeking permission of involvement of an External Speaker in an onsite, offsite or online event through induction, welcome back sessions and information on the VLE.	Ongoing	Emma Brown (Student Support Manager)	All External Speakers are vetted before participation in onsite, offsite or online events.		
Welfare, Pastoral & Student Support Mechanism	The College has well established and highly commended welfare, pastoral and student support mechanisms in place and staff will continue to receive training on identifying early signs of radicalisation to enable early intervention. **LH 1 x SV 5 = Risk Score 5**	Continue to ensure staff providing welfare, pastoral and student support are well versed in what to monitor in students with regards to extremism and radicalisation. Continue to ensure students are fully aware of and how to access the range of welfare, pastoral and student support mechanisms in place to support them during their studies	Ongoing	Emma Brown (Student Support Manager)/ Personal Tutors/ Counsellor	Early identification by support staff or students of extremism and radicalisation.	Ongoing	Ongoing
External Speakers & Events	The College acknowledges the importance of vetting External Speakers for onsite, off site and online events. Due to the small nature of the College relatively few events involving external speakers occurs but a process is in place through our Policy on Freedom of Expression, contained within our Governance & Academic Regulations Handbook, which incorporates our policy and process on seeking approval for the inclusion of external speakers within College events.	Ensure all staff and students are aware of the process for obtaining permission for involvement of an External Speaker as part of an onsite, offsite or online event	Ongoing	Matt Green (COO) in liaison with Emma Brown (Student Support Manager) & Cathy Coombes (HR Lead)	All External Speakers are vetted before participation in onsite, offsite or online events. Information about External Speakers can be shared with other Partner organisations.	Ongoing	Ongoing

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	LH 1 x SV 5 = Risk Score 5						
Prayer & Faith Facilities	The College makes provision for students at our main Oxford centre to use a quiet space if they wish to for private prayer & meditation. Provision for multifaith room when using MMU, Students in St James building signposted to external faith venues. **LH 2 x SV 4 = Risk Score 8**	Continue to make students aware of the quiet space available at our Abingdon centre for private prayer & meditation. Signposting to external faith spaces for students to attend.	Ongoing Ongoing	Programme Leads & Student Support Manager	Students of all faiths feel inclusive and have appropriate arrangements to practise their faith.	Ongoing Ongoing	Ongoing Ongoing
Centre Security	The College main Oxford site has a dedicated Facilities team who are aware of the Prevent Duty. The Oxford building itself maintains secure student areas and are regularly monitored by staff and CCTV. The College Manchester satellite site sits within a larger multi tenanted building, which includes other HE institutions and is subject to the provision the security measures provided by the building management company. **LH 2 x SV 3 = Risk Score 6**	Ensure all staff, including facilities staff are aware of their duties in relation to the Prevent Duty and for monitoring suspicious behaviour.	Ongoing	Matt Green (COO) in liaison with John Stilwll (Facilities Manager)	To ensure both centres are secure and consideration of the Prevent Duty is incorporated into the ongoing monitoring of Centre security.	Ongoing	Ongoing
Review and updating the	The College acknowledges that its Prevent Strategy and Action plan will	Continue to review and update the Risk Assessment, Action Plan and Prevent	Ongoing	Matt Green (COO)	Risks to the College are known and understood by Students,	Ongoing	Ongoing

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College's Prevent Risk Assessment, Action Plan & Strategy	evolve over time and through performing regular updates to the Risk Assessment and Action Plan **LH 3 x SV 3 = Risk Score 9**	Strategy, at least annually in line with the annual OfS Prevent return Ensure that risks identified within the Police's 'Local Counter Terrorist Profile' are included moving forward.			Staff, Managers and the Governing Body Board of Directors. Up to date, relevant and meaningful strategy and Action plan in place	Ongoing	Ongoing
OfS Annual Reporting Requirements	Annual OfS reporting requirements in relation to: • Number of Prevent incidents • Numbers of staff training (induction and refresher) • Number of External speaker requests	Ensure accurate data is collated over the course of the year in the Prevent network drive folder.	Dec-22	Matt Green (COO) in liaison with Emma Brown (Student Support Manager) and Cathy Coombes (HR Lead)	Accurate data maintained	In progress	In progress

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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.

Useful links

Online Prevent Training

https://preventforfeandtraining.org.uk/

https://www.elearning.prevent.homeoffice.gov.uk/edu/screen1.html

Prevent Training Materials

https://www.gov.uk/government/collections/the-prevent-duty-in-higher-education-he-training-and-guidance-for-practitioners

National HE Prevent Strategy

https://www.gov.uk/government/publications/prevent-duty-guidance/prevent-duty-guidance-for-higher-education-institutions-in-england-and-wales

Statutory guidance - Revised Prevent duty guidance: for England and Wales
https://www.gov.uk/government/publications/prevent-duty-guidance/revised-prevent-duty-guidance-for-england-and-wales

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Document Controls

Document Approvals

Named person(s) below indicates that this document has been reviewed and approved by the appropriate people. This document is subject to formal change control procedure.

Date	Role/Position	Name
01/12/21	COO	Matt Green
17/05/21	COO	Matt Green
18/05/22	COO	Matt Green
28/05/23	COO	Matt Green

11.2 Amendment History

Date	Version	Author	Description
01/12/21	1	Matt Green	Policy created
17/05/21	2	Matt Green	Updated in light of submission to OfS May 21
18/05/22	3	Matt Green	Annual update 2022
28/05/23	4	Matt Green	Annual update 2023

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