



Risk No and Name: Risk No. 11 Prevent Duty (November 2017)						
Strategic/Operational: Operational		Description: Failure to meet the duty placed upon Ravensbourne as a “Relevant Higher Education Body (RHEB) under Section 26(1) of the Counter-Terrorism and Security Act 2015 to have due regard to the need to prevent people from being drawn into terrorism.				
Risk Owner: Director of Academic Services	Risk Category: Health & Safety	Risk Appetite: Cautious	Total Risk Likelihood	3	Residual Risk Likelihood	2
			Total Risk Impact	3	Residual Risk Impact	3
			Total Risk Score	8	Residual Risk Score	5
Review Comments:						
<p>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.</p> <p>Extremism is defined 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”¹. Radicalisation is “the process by which people come to support violent extremism and, in some cases, join terrorist groups”².</p> <p>The <i>Prevent Duty Guidance: for higher education institutions in England and Wales</i> requires us to comply in the following areas: a) Governance and management b) Partnerships c) Action Plan, d) Staff Training, b) Welfare and pastoral care/chaplaincy support, d) IT policies, d) c and e) Monitoring and enforcement. Ravensbourne cannot be complacent about the danger of because of number of factors. It is located close geographically to sites of extremist violence (eg Woolwich) and draws on a student demographic similar to near by institutions which have had students and graduates involved in terror or had extremism on campus. In order to comply fully with <i>Prevent Duty Guidance</i> detailed Individual sub registers are maintained for each of the areas (a-e) listed above. This register and the sub-registers once completed will be submitted to HEFCE and will be annually updated.</p> <p>The analysis below relates only to the general threat of extremism or terrorism in Ravensbourne’s particular contexts. This risk assessment is informed by such limited guidance³ and research as exists on the factors likely to contribute to an individual’s radicalisation. The countervailing risk that the implementation of the Duty may contribute to the alienation of individual and groups and the need to protect Freedom of Speech and Academic Freedom have been encompassed within this register.</p>						
Overview of Campus and Students						

Trigger	Consequence	Mitigating Actions
<ul style="list-style-type: none"> ● <i>Prevent Duty Guidance for Higher Education, 2015</i> ● <i>Since implementation of the Duty, Prevent related concerns have been low.</i> In the reporting period, there was a direct Police referral in relation to an alumni. 1 case was escalated to the Prevent Lead but not referred on the balance of evidence. A lower level concern was monitored internally. ● <i>London location</i> – As a major global city, it is a significant centre of operation and recruitment for a very broad spectrum of violent and non-violent extremists (including amongst others: religious extremists, right and left wing extremists, nationalists and separatists, and animal rights activism) leading to a higher risk of its students being exposed to extremist views and/or introducing those to the institution. ● <i>Specific location</i> – adjacency to iconic tourist attraction which may be a target for terrorists and proximity both to institutions which have had issues in relation to extremism on campus and areas where there have been noted incidents of radicalisation. ● <i>Student demographic</i> – Ravensbourne recruits a student population from a diversity of ethnic, national, and religions (circa 35% of students are from an ethnic minority background). This diversity is a strength as being well-educated and aware about other ethnic or religious groups has been found to increase resilience to extremism. However, it increases the risk that in some cases, a student may have previously had limited 	<ul style="list-style-type: none"> ● Students or other stakeholders exposed to extremist views and/or drawn into terrorism ● Institutional failure to identify an individual undergoing radicalisation or at risk of being drawn into extremism (due to inadequate policies and staff training) ● Student or graduate commits or conspires to commit an act of terrorism ● External speaker knowingly or unknowingly allowed to use premises for unlawful speech or incitement to criminal acts ● Infringement of Diversity policies and/or breach of the Equalities Act, 2010 ● Demonstrations, protests and/or counter demonstrations because of the above ● Police action, student and/or public complaint because of the above ● Adverse publicity and reputational damage because of the above ● Failure of statutory duty set out in Counter-Terrorism and Security Act 2015. ● Failure to protect Freedom of Speech and/or Academic Freedom ● Potential to alienate individuals and/or groups by disproportionate or insensitive implementation 	<ul style="list-style-type: none"> ● Prevent Duty guidance analysed and full risk assessment covering all aspects of the guidance carried out. ● HEFCE signed off on Ravensbourne's arrangements on 1st June 2016 ● HEFCE Monitoring Framework and other advice analysed. ● Hefce Prevent duty annual reporting: monitoring outcome 2015/16 was 'demonstrated sufficient evidence of due regard to the Prevent duty' (1st February 2017). ● Institutional Action Plan in relation to Prevent Strategy is in place. ● Statement of Arrangements setting out the management, policy and implementation of the Duty in place. ● Safeguarding Policy reviewed and revised to include Prevent Duty related measures and approved by Board of Governors (BoG) in 2014/15 (see Section 3). ● Director of Academic Services (DAS) is identified SMT lead on Prevent (see Section 1). ● A significant programme of Prevent related training undertaken (see Section 4) and further training planned. ● Ravensbourne is engaged with Prevent Network and with other agencies (Police etc) (see Section 2). ● RSU have engaged with the Prevent Duty and work collaboratively on its implementation ● Strong welfare and pastoral care in place and strengthened during 2014/15 (see

<p>contact with anyone outside of their own ethnic and/or religious group. Radicalisation can be related to a crisis in identity and, specifically, to a feeling of not being accepted or not belonging. This marginalisation can make someone to vulnerable to radicalisation. Equally, those experiencing a diversity of ideas for the first time may be vulnerable to radical new identity-defining belief systems.</p> <ul style="list-style-type: none"> ● <i>Student demographic</i> – socio-economic background. Ravensbourne promotes social mobility and actively recruits students from some of the most economically deprived areas (including some areas where radicalisation has been noted). Almost half of its first level Home/EU intake qualify for some form of bursary support. Many students experience financial crisis or instability during their studies. Such instability has been a context in a number of noted cases of radicalisation elsewhere. ● Many students experience <i>other personal crises</i> during their studies and this can be a context in vulnerability to extremism. ● <i>Subject Specialism</i> – Ravensbourne operates in some technological areas which may attract extremists (eg web related disciplines because of the central role of social networks in recruitment to extremist groups or activities) For the most part our subject areas are not ones which have been associated with known cases of radicalisation. Further our students tend to be extremely vocationally focused. ● 1 student (now graduated) was a person of interest in 2012 in a <i>Police investigation</i> into an extremist related matter. There has been 		<p>Section 3)</p> <ul style="list-style-type: none"> ● Multi-faith chaplaincy support and ‘quiet space’ in place. Clear and simple guidance in relation to the latter are also in place and it is monitored by Student Services (see Section 3) ● IT policies have been reviewed in relation to the Duty (see Section 6). ● Code of Practice on Freedom of Speech, Academic Freedom and Controversial Meetings & Speakers in place (see Section 5). ● Entry to building is secure and security monitoring in operation. ● The wearing of ID on campus by staff, students, contractors and visitors is mandatory and is strictly enforced. ● Penetration testing by an independent security consultant was conducted in October 2015 and operational changes put in place in response. ● All events booked by external parties come through a single professional team (see Section 5). ● All staff and students must book rooms through Timetabling and only recognised RSU societies can book spaces for non-discipline related meetings or events (see Section 4). ● RSU constitution was reviewed in 2015 and it is compliant in relation to the democratic requirements stated in the Prevent Duty (see Section 7). ● Governance and Monitoring arrangements are in place in relation to HEFCE’s assurance system for Prevent. The lead governor on Safeguarding will also have responsibility for oversight of Prevent (see
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<p>no evidence to suggest that person was a suspect, the subject of criminal proceedings or conviction subsequently. While this is a low instance compared to other London HEIs, Ravensbourne's small size must be taken into account and it still suggests a need to be vigilant.</p>		<p>Section 1).</p>
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1. Prevent Duty Guidance for Higher Education, 16 July 2015
2. Communities and Local Government Committee - Sixth Report, Preventing Violent Extremism, 2010
3. Guidance for Identifying People Vulnerable to Recruitment into Violent Extremism, Cole, Alison, Cole & Alison, University of Liverpool, 2007

Section 1 - Management & Governance		
Trigger	Consequence	Mitigating Actions
<ul style="list-style-type: none"> • <i>Prevent Duty Guidance for Higher Education, 2015</i> • Non-compliance due to inadequate governance and management • Lack of robust systems internally due to inadequate oversight and awareness 	<ul style="list-style-type: none"> • Failure of statutory duty set out in Counter-Terrorism and Security Act 2015. • Students or other stakeholders exposed to extremist views and/or drawn into terrorism • Institutional failure to refer an individual undergoing radicalisation or at risk of being drawn into extremism (due to inadequate policies and staff training) • Inadequate internal expertise due to inadequate networking. 	<ul style="list-style-type: none"> • Director of Academic Services is institutional lead on Prevent Duty on behalf of SMT • Head of Student Services is Single Point of Contact in respect of the Safeguarding aspects of the Duty. • A member of the Board of Governors lead delegated with responsibility for student welfare will have particular responsibility • 2 members of the Board of Governors attended a HEFCE Prevent event in • SMT received an annual update on Prevent Duty and its ramifications • Board of Governors will receive annual reports on considered/referred/accepted to the Channel programme and on Events/Speakers escalated in respect , and staff training. • Institutional Prevent Risk Assessment and Action Plan will be reviewed annually by Director of Academic Services on behalf of SMT and submitted to the Board. • Arrangements for escalating serious incidents internally and ad-hoc reporting of these to HEFCE are well understood and set out in the Prevent Duty Statement of Arrangements. • Following advice from a FE Quality Consultant - clearer information on Prevent Duty arrangements are being put on an intranet page.

4. Prevent Duty Guidance for Higher Education, 16 July 2015

5. Communities and Local Government Committee - Sixth Report, Preventing Violent Extremism, 2010
6. Guidance for Identifying People Vulnerable to Recruitment into Violent Extremism, Cole, Alison, Cole & Alison, University of Liverpool, 2007

Section 2 – Partnership		
Trigger	Consequence	Mitigating Actions
<ul style="list-style-type: none"> ● <i>Prevent Duty Guidance for Higher Education, 2015</i> ● Requirement to have in place adequate partnerships and networks to support the implementation of the Prevent Duty particularly in view of Ravensbourne’s relatively small size and specialist nature ● In particular, a requirement to have in place contacts, support and networks to support referrals to external agencies (eg Channel). 	<ul style="list-style-type: none"> ● Students or other stakeholders exposed to extremist views and/or drawn into terrorism ● Institutional failure to refer an individual undergoing radicalisation or at risk of being drawn into extremism (due to inadequate policies and staff training) ● Inadequate internal expertise due to inadequate networking. ● Proliferation of external speakers with extremist views caused by failure to inform other institutions about controversial external speakers 	<ul style="list-style-type: none"> ● Director of Academic Services & Head of Student Services continue to attend conferences and HEFCE round tables in relation to the Duty. ● HEFCE Prevent Adviser visited Ravensbourne in April 2017 ● Ravensbourne has engaged with the BIS Prevent Network and is in contact with the BIS Prevent Network Co-ordinator and this will continue. ● The HE/FE Regional Prevent Coordinator visited Ravensbourne a number of times during this reporting period. ● Links are in place with relevant Prevent Police Channel Practitioner (September 2016). The Prevent (Counter Extremism) Coordinator for Greenwich visited Ravensbourne in October 2016 and met Director of Academic Services and Head of Student Services. ● Ravensbourne’s Students’ Union (RSU) have been engaged with the Prevent Duty and undertaken to work collaboratively on its implementation. This has included Joint Executive discussions, RSU input at Academic Board and on other committees, and annual presentations to the Student Parliament on the Prevent Duty.

7. Prevent Duty Guidance for Higher Education, 16 July 2015

- 8. Communities and Local Government Committee - Sixth Report, Preventing Violent Extremism, 2010
- 9. Guidance for Identifying People Vulnerable to Recruitment into Violent Extremism, Cole, Alison, Cole & Alison, University of Liverpool, 2007

Section 3 - Welfare and Chaplaincy			
Trigger	Consequence	Mitigating Actions	

<ul style="list-style-type: none"> ● <i>Prevent Duty Guidance for Higher Education, 2015.</i> ● Students vulnerable to or drawn into terrorism because of inadequate welfare, pastoral, chaplaincy or safeguarding provision or failure in one of these areas. 	<ul style="list-style-type: none"> ● Students or other stakeholders exposed to extremist views and/or drawn into terrorism ● Institutional failure to identify an individual undergoing radicalisation or at risk of being drawn into extremism (due to inadequate policies and staff training) ● Police action, student and/or public complaint because of the above ● Adverse publicity and reputational damage because of the above ● Failure of statutory duty set out in Counter-Terrorism and Security Act 2015. 	<ul style="list-style-type: none"> ● Strong welfare and pastoral care in place and strengthened further during 2015/16 with additional staff fully trained in safeguarding ● Internal Audit of Student Welfare and Safety took place in Autumn 2015/16. No major issues were flagged. ● Safeguarding Policy reviewed and revised to include Prevent Duty related measures and approved by Board of Governors in June 2015. ● Head of Student Services is Single Point of Contact (SPOC) for Prevent. ● Student Services staff have had two tranches of training in relation to Prevent (see Section 4). ● Student Services are delivered a tranche of training for other key layers of staff in December 2015 so that they are equipped to identify students vulnerable to radicalisation and are clear on internal referrals (see Section 4). ● SPOC has access to external networks and support in respect for advice and referrals (eg Channel) ● Multi-faith chaplaincy support is provided via Greenwich Peninsula Chaplaincy. There is regular institutional liaison with the Chaplaincy by the Head of Student Services and Director of Academic Services ● A 'Quiet Space' for prayer and reflection is in place. ● Clear and simple guidance in relation to the use of latter is also in place. Meetings are not allowed in the space. ● Quiet Space usage is monitored by Student Services. Following advice from FE Quality Consultant a formal policy on the Quiet space is now being drafted. ● A Governor designated a lead on Safeguarding will also have responsibility for oversight of Prevent.
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- 10. Prevent Duty Guidance for Higher Education, 16 July 2015
- 11. Communities and Local Government Committee - Sixth Report, Preventing Violent Extremism, 2010
- 12. Guidance for Identifying People Vulnerable to Recruitment into Violent Extremism, Cole, Alison, Cole & Alison, University of Liverpool, 2007

Section 4 - Staff Training			
Trigger	Consequence	Mitigating Actions	

<ul style="list-style-type: none"> ● <i>Prevent Duty Guidance for Higher Education, 2015</i> ● Non-compliance due to inadequate awareness, knowledge, expertise or capability ● Failure to identify and internally refer a student vulnerable to radicalisation due to inadequate awareness or knowledge. ● Failure to refer externally a student vulnerable to radicalisation due to inadequate awareness of knowledge ● Extremist meeting or speaker allowed on campus due to inadequate training of staff involved in management of meetings ● Inappropriate referral to Channel due to lack of staff awareness or understanding ● Inappropriate escalation of meetings and/or speakers 	<ul style="list-style-type: none"> ● Students or other stakeholders exposed to extremist views and/or drawn into terrorism ● Institutional failure to identify an individual undergoing radicalisation or at risk of being drawn into extremism (due to inadequate policies and staff training) ● External speaker knowingly or unknowingly allowed to use premises for unlawful speech or incitement to criminal acts ● Proliferation of External Speaker who incites criminal acts by not sharing experience with other institutions ● Infringement of Diversity policies and/or breach of the Equalities Act, 2010 ● Failure of statutory duty set out in Counter-Terrorism and Security Act 2015. ● Potential to alienate individuals and/or groups by disproportionate or insensitive implementation 	<ul style="list-style-type: none"> ● Director of Academic Services and Head of Student Services continue to attend sector conferences and HEFCE round tables on the implementation of the Duty and continue to maintain currency. ● Board of Governor Lead on Prevent, Director of Academic Services and Head of Student Services met with HEFCE Prevent Adviser in April 2017. ● DSL (SPOC) attended full three day refresher course. ● 15 staff from Student Services, Health and Safety, Marcomms and Facilities had one day safeguarding training (including Prevent) in April 2017 ● 1 Member of Student Services and an AD have had external training on delivering Prevent related sessions to students during Summer 2017 ● All new academic staff were introduced to the Duty as part of the Student Services well-being and safeguarding induction. ● Training needs will be assessed on an annual basis by the Head of Student Services/Director of Academic Services.
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13. Prevent Duty Guidance for Higher Education, 16 July 2015

14. Communities and Local Government Committee - Sixth Report, Preventing Violent Extremism, 2010

15. Guidance for Identifying People Vulnerable to Recruitment into Violent Extremism, Cole, Alison, Cole & Alison, University of Liverpool, 2007

Section 5 - External Speakers and Meetings		
Trigger	Consequence	Mitigating Actions
<ul style="list-style-type: none"> ● <i>Prevent Duty Guidance for Higher Education, 2015</i> ● London location – our campus may be attractive to external organisations whose activities and events are unlawful or promote extremism. ● Diverse student demographic may be a target for radicalisation by external organisations whose activities and events are unlawful or promote extremism. ● Individuals within the student body may seek to radicalise others or promote extremism. Given the vocational and professionally focused ethos and low levels of political, social & religious activism among the student body, this risk seems quite low. Only 13 student societies in the current academic year mainly orientated on sports, discipline interest and hobbies. ● There have been zero instances of 	<ul style="list-style-type: none"> ● Students or other stakeholders radicalised and/or drawn into terrorism by exposure to extreme views at campus based meetings or by external speakers ● External speaker knowingly or unknowingly allowed to use premises for unlawful speech or incitement to criminal acts ● Infringement of Diversity policies and/or breach of the Equalities Act, 2010 ● Demonstrations, protests and/or counter demonstrations because of the above ● Police action, student and/or public complaint because of the above ● Adverse publicity and reputational damage because of the above ● Failure of statutory duty set out in Counter-Terrorism and Security Act 2015. 	<ul style="list-style-type: none"> ● Code of Practice on Freedom of Speech, Academic Freedom in place ● Procedure on Controversial Meetings & Speakers in place. Only 1 meeting was escalated in 2015/16 and that was erroneous. ● Entry to building is secure and security monitoring in operation. ● All external events booked by external parties come through a single professional team ● All staff and students must book rooms through Timetabling ● Only recognised RSU societies can book spaces for non-discipline related meetings or events. ● Visiting lecturers and guest speakers for curriculum and co-curriculum events are subject to an appointment process and/or under supervision of staff

<p>controversial meeting or speakers which may lead to complacency</p>	<ul style="list-style-type: none"> ● Failure to protect Freedom of Speech and/or Academic Freedom ● Potential to alienate individuals and/or groups by disproportionate or insensitive implementation 	<ul style="list-style-type: none"> ● Branding of events off campus requires permission of Director of External Affairs ● Commitment to sharing of information with other institutions/partners in relation to controversial meetings/speakers set out in Statement of Arrangements. ● The wearing of ID on campus by staff, students, contractors and visitors is mandatory and is strictly enforced
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16. Prevent Duty Guidance for Higher Education, 16 July 2015

Section 6 – IT		
Trigger	Consequence	Mitigating Actions
<ul style="list-style-type: none"> ● <i>Prevent Duty Guidance for Higher Education, 2015</i> ● Potential for students using institutional IT or Wifi network to access extremist sites or propagate extremism 	<ul style="list-style-type: none"> ● Student accesses extremist sites using institutional IT or Wifi network ● Infringement of Diversity policies and/or breach of the Equalities Act, 2010 ● Police action, student and/or public complaint because of the above ● Adverse publicity and reputational damage because of the above ● Failure of statutory duty set out in Counter-Terrorism and Security Act 2015. ● Failure to protect Academic Freedom by restricting network access disproportionately ● Potential to alienate individuals and/or groups by disproportionate or 	<ul style="list-style-type: none"> ● Acceptable Use Policy updated to make explicit reference to Prevent Duty in Autumn 2015 ● Social Media Guidance in the Student Contract Handbook is fit for purpose and will be updated to make more explicit reference to Prevent Duty in the next edition. ● A network monitoring pilot has been under way since Spring 2016 in partnership with JISC using Watchguard. This will be reviewed shortly following a move to new cloud servers. There has been no evidence of students or staff accessing extremist or other sites that might cause concern.

	insensitive implementation	<ul style="list-style-type: none"> • The College is engaging with JISC in relation to potential filters. • Code of Practice on Freedom of Speech, Academic Freedom in place and provision in the General Ethics and Research Ethics policy to safeguard legitimate research and academic activity • Safeguarding Policy and Disciplinary Policy
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17. Prevent Duty Guidance for Higher Education, 16 July 2015

Section 7 – Student Union and Societies			
Trigger	Consequence	Mitigating Actions	
<ul style="list-style-type: none"> • <i>Prevent Duty Guidance for Higher Education, 2015</i> • London location – our campus may be attractive to external organisations whose activities and events are unlawful or promote extremism. • Student Union (RSU) or one of its societies advertently/inadvertently allows an extremist speaker or event to take place on campus. • Allows advertently/inadvertently an extremist society to affiliate with the RSU. • Individuals within the student body may seek to radicalise others or promote extremism. Given the vocational and professionally focused ethos and low levels of political, 	<ul style="list-style-type: none"> • Students or other stakeholders radicalised and/or drawn into terrorism by exposure to extreme views at campus based meetings or by external speakers • External speaker knowingly or unknowingly allowed to use premises for unlawful speech or incitement to criminal acts • Infringement of Diversity policies and/or breach of the Equalities Act, 2010 • Demonstrations, protests and/or counter demonstrations because of the above • Police action, student and/or public complaint because of the above 	<ul style="list-style-type: none"> • RSU constitution was reviewed in 2015 and is fit for purpose. • RSU is not a legally independent entity or charity in its own right and so is subject to the duty. • RSU was fully engaged in the development of Prevent Duty related policy • Code of Practice on Freedom of Speech, Academic Freedom in place • Procedure on Controversial Meetings & Speakers in place. • Entry to building is secure and security monitoring in operation. • All students must book rooms through 	

<p>social & religious activism among the student body, this risk seems quite low. Only 13 student societies in the current academic year mainly orientated on sports, discipline interest and hobbies.</p> <ul style="list-style-type: none"> • There have been zero instances of controversial meeting or speakers which may lead to complacency 	<ul style="list-style-type: none"> • Adverse publicity and reputational damage because of the above • Failure of statutory duty set out in Counter-Terrorism and Security Act 2015. • Failure to protect Freedom of Speech and/or Academic Freedom • Potential to alienate individuals and/or groups by disproportionate or insensitive implementation 	<p>Timetabling</p> <ul style="list-style-type: none"> • Only recognised RSU societies can book spaces for non-discipline related meetings or events. • The wearing of ID on campus by students and visitors is mandatory and is strictly enforced • Noticeboards are informally monitored by the information desk/Student Services. A Formal policy is development.. • Update on Prevent at December 2017 Student Representative Parliaments.
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