

TDM Prevent, British Values and Critical Incident Policy

Prevent Duty

TDM have a duty to safeguard their learners and all people we work with.

This policy must be read together with our safeguarding policy and our equal opportunities policy.

TDM follows the statutory guidance in relation to the Prevent Duty. "Section 26 of the Counter-terrorism and Security Act 2011" and the "Prevent strategy", published by the Government in 2011.

The Act places a duty on certain bodies, in the exercise of their functions, to have "due regard to the need to prevent people from being drawn into terrorism".

The aim of the Prevent strategy is to reduce the threat to the UK from terrorism by stopping people becoming terrorists or supporting terrorism.

In the Act this has simply been expressed as the need to "prevent people from being drawn into terrorism".

The 2011 Prevent strategy has three specific strategic objectives:

- Respond to the ideological challenge of terrorism and the threat we face from those who promote it.
- Prevent people from being drawn into terrorism and ensure that they are given appropriate advice and support.
- Work with sectors and institutions where there are risks of radicalisation that we need to address. including education, criminal justice, faith, charities, the internet and health sectors.

TDM are required to assess the risk of children and young people being drawn into terrorism, including support for extremist ideas that are part of terrorist ideology.

A system of threat level has been created which represents the likelihood of an attack in the near future.

The five levels are:

- Critical- an attack is expected imminently
- Severe – an attack is highly likely
- Substantial – an attack is a strong possibility
- Moderate – an attack is possible but not likely
- Minor – an attack is unlikely

As a Training Provider, TDM have a duty to be an active participant in the UK Prevent Strategy and as such we have risk assessed for safeguarding and the prevent duty specifically.

These risk assessments help us have a focussed effort on key areas where further action is needed to improve on our provision and better safeguard our learners.

(See appendix 1 for the Risk Assessment for Safeguarding – which includes Prevent. TDM also considers this as the action plan to continue to strengthen and improve on our response).

The TDM Leadership Team and Directors are responsible to ensure actions identified are implemented and monitored for effectiveness.

All TDM staff must play a part in fostering shared values and promoting cohesion amongst the learners, the employers we partner with, the Training Providers Networks we participate in (Worcester, Birmingham and surrounding areas).

TDM coaches are at the forefront of the curriculum delivery and thus have an active role in promoting British Values. Talking to learners and employers about the prevent agenda and how good practice can be implemented in their places of work and the wider community.

TDM staff should focus on the risks of violent extremism, which represents the greatest threat at national level, while recognising that other forms of violence and extremism can and do manifest themselves in the community.

TDM's Prevent Strategy aims:

- To promote "British Values" and embed these throughout the curriculum delivery. That involves delivery in the classroom, the workplace, the distance coaching interventions, the workshops, and the one-to-one support.
- To create a space of free and open debate and to listen to the voice of learners with an understanding of the protected characteristics of the equality act 2010.
- To encourage learners' participation as citizens in their places of work and the wider community.
- To ensure staff, employers and learners understand their roles and responsibilities in preventing violent extremism and to know when and how to report concerns.
- To ensure learners feel safe and that TDM premises are free from bullying, harassment and discrimination.
- To provide support, advice and guidance to learners who may be at risk.
- To have a robust IT system, able to monitor IT activity that may be suspicious and to know when and how to report concerns.
- To train its staff on a regular basis to keep up to date with the risks of extremism and radicalisation and to confidently know how to react to threats and how to report concerns.

TDM is committed to training its staff regarding the Prevent duty:

- Staff will be given time to complete the below course, to support them to adopt the prevent duty: <http://www.preventforfeandtraining.org.uk/>
- TDM will regularly train staff via internal team training and standardisation sessions or via external consultants training.
- TDM actively participates in the training provider networks in both Worcester and Birmingham, sharing of best practice. Extra training is made available via these networks.
- All delivery staff must undertake the CHANNEL awareness online course at : https://www.elearning.prevent.homeoffice.gov.uk/channel_awareness/01-welcome.html
- Staff CPD areas in the intranet will keep a record of achievement of the prevent courses and managers will organise refresher training if necessary.

Prevent & British Values

To support the Prevent Duty strategy, TDM must also exemplify British Values in management, teaching practice & general behaviours.

British Values are defined as:

- Rule of Law
- Individual Liberty
- Mutual respect & tolerance of those from other backgrounds, religions, beliefs,
- Democracy

The Prevent duty also includes an expectation that staff will encourage students to respect other people with particular regard to the protected characteristics set out in the Equality Act 2010

This includes understanding the Equality Act 2010 and preventing discrimination against those with protected characteristics:

- age;
- disability;
- gender reassignment;
- marriage and civil partnership;
- pregnancy and maternity;
- race;
- religion or belief;
- sex;
- sexual orientation.

All TDM staff are expected to understand and embed British Values into all programmes delivery to ensure learners are aware and that they can evidence and exemplify them. This helps learners to gain an understanding of what it means to be a successful citizen, taking part in life on Britain today.

Learners will also be required to understand how to keep themselves protected from risks associated with radicalisation, extremism, forms of abuse, grooming, bullying & staying safe online.

All TDM staff are expected to work with employers to ensure learners are not exposed to risks associated with any of the above and adequate awareness of Prevent & British Values has taken place with workplace mentors, line managers or HR.

All TDM staff must have an open culture which allows freedom of speech and exploration of issues that affect learners locally, nationally & internationally. Providers are to operate a safe place for learners to communicate, but provide challenge where views or discussions become offensive, extreme or upsetting to others. Safeguarding and Safety will remain TDM's top priorities, regarding the advice and guidance we give to all learners.

Critical Incident Policy

This Critical Incident Policy supports the Prevent Policy by providing more specific details about responding to an emergency.

An emergency is an unplanned or imminent event that affects or threatens the health, safety or welfare of people, property and infrastructure, and which requires a significant and coordinated response.

(See Appendix 3 for Emergency Numbers)

Definitions:

A critical incident is an unexpected traumatic event where the outcome or consequence of that incident is likely to result in any of the following:

- serious harm to any individual
- significant community or business impact
- significant impact on the confidence of the public
- requiring special arrangements and professional incident management capability to respond.

Incidents could arise from security threats, terrorist threat or attack, a bomb threat, hostage taking, local uprising or riot, arson or major fire, escapee from detention, death or serious injury to individuals, suicide attempts, assault on staff or learners, industrial action, criminal acts, or serious data breach.

While the above may be considered rare, the purpose of this policy and risk assessment is to identify how as an organisation, we ensure learners, staff and visitors stay safe and know how to stay safe either at their workplace, in learning or in the community.

The overarching purpose of this policy is to save and protect human life.

Who can declare a critical incident?

Anyone can declare a local critical incident but doing so confers responsibility. Whilst the decision to declare a critical incident should not be taken lightly, it is much better to do so, take the appropriate action and then 'un-declare' it, rather than do nothing and increase the potential for escalation and risk.

Incidents involving unrest, civil violence, security and terrorist threats will be directed by the security services and their advice should take priority. However, having an organisational policy will help ensure staff and learners know what to do in the event of a threat.

Reporting suspected terrorism

If you think you know of terrorist activity being carried out or planned, there are steps you can take. Individuals are strongly advised not to approach anyone observed in terror or criminal activity and immediately report their concerns to the security services.

Immediate threat

call 999 if there's an immediate threat

call the police counter-terrorism hotline, 0800 789 321

No immediate threat to life

if there is no immediate threat to life you can also contact the Security Service (MI5) using their online contact form or freephone 0800 111 4645

if you have found information, pictures or videos online that promote terrorism, you can report it on the Home Office website

Risk Management

All directors, board members, staff and volunteers should be trained in disaster and emergency response procedures. Emergency evacuation drills are undertaken under the instruction of the designated safeguarding leads and officers.

Critical incident risk assessments and plans are reviewed bi-annually and/or following the event of a critical incident. As far as possible, traumatic events are prevented, and the impacts of trauma are minimised following traumatic events. The diagram below illustrates the leadership and management team's role in recognising and mitigating risk.



Preventative measures

While no amount of planning can totally prevent major incidents occurring, through the implementation of this policy most can be prevented, or the risk minimised by taking appropriate precautionary measures. It is expected that:

- all staff and learners should be familiar with the provider routines for fire and the evacuation of the building(s) on hearing the fire alarm(s).
- all staff should be familiar with the routines and procedures for dealing with emergencies
- all staff and learners should be familiar with the providers on-site security procedures, that all visitors not wearing a visitor's authorised lanyards should be questioned and escorted to reception.
- staff do not allow entry to the building to any visitor who has not signed into reception.
- all staff should sign in and out of the premises or do so via calendar/fob access.
- all staff and learners should be familiar with the providers online security policies and procedures and know how to report any concerns.
- all staff are aware of learners with medical needs or health problems to be able to support them.
- all staff are aware they must assess associated risks to young people before carrying out an activity.

Identifying those risks most likely to occur

While we evaluate all risks and identify preventative measures there are those that may be beyond our control, such as:

- Abuse from parents, carers or former learners
- Uninvite strangers in the building
- Vandalism to the building out off, or during working hours
- Current, expelled or former learners causing nuisance to learners and staff
- Vandalism to staff vehicles or property
- Staff should never confront the individual and seek assistance where possible, our policy is that only senior staff or the designated person in charge should ask anyone to leave the premises if they are confident to do so.


Risk Assessment and Planning

A risk assessment process is in place identifying incidents that may occur, their likelihood to occur, and the likely impact on the organisation and delivery of learning programmes plus immediate actions to take to ensure safety

(See appendix 1&2)

Document Management

| | |
|---|--|
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| CEO policy and procedure approval | | Derrin Kent Managing Director-Director of Studies-Governor | | | |
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Appendix 1: Risk Assessment for Safeguarding / Prevent Duty + Action Plan

Risk Assessment for Safeguarding / Prevent Duty

| | | IMPACT | | | | |
|------------|----------------|--------|----------|-------------|--------|----------|
| | | 5 | 10 | 15 | 20 | 25 |
| LIKELIHOOD | Almost Certain | 5 | 10 | 15 | 20 | 25 |
| | Very Likely | 4 | 8 | 12 | 16 | 20 |
| | Likely | 3 | 6 | 9 | 12 | 15 |
| | Unlikely | 2 | 4 | 6 | 8 | 10 |
| | Improbable | 1 | 2 | 3 | 4 | 5 |
| | | Minor | Moderate | Substantial | Severe | Critical |

| ACTION | RISK SCORE | RATING | RAG |
|----------------------|------------|-------------|-----|
| Make do | 1-2 | Minor | G |
| Manage | 3-6 | Moderate | A |
| Monitor | 8-12 | Substantial | A |
| Mitigate | 15-16 | Severe | A |
| Urgent action | 20-25 | Critical | R |

| No | Risk Title | Summary of risk | Gross Score | Existing Controls | Risk Score | Further Action Needed | RAG rating |
|----|---------------|---|--|--|---|--|----------------------------|
| 1 | Online Safety | Extremist organisations can radicalise learners online and encourage them to commit acts of violence or incite others to commit acts of violence as lone actors. Learners (and staff) can access unlawful radicalising material which promotes proscribed terrorist groups. | 20 Critical Very likely | <p>er Essentials certification achieved</p> <p>vent agenda is a topic of focus within our coaching process</p> <p>nputers and Electronic Communications Policy in place that is communicated as part of staff induction and learners' orientation to TDM.</p> <p>f/coaches monitor learners use of computers in classrooms whilst training is occurring and during breaks.</p> | 10 Critical Unlikely | <p>Complete azure phase 2 during Q1 and Q2 in academic year 2021-2022. Tech team to continue to closely monitor on a daily basis.</p> <p>All staff to continue to monitor on a daily basis and report any issues promptly, using the right reporting channels.</p> | Substantial Monitor |

| No | Risk Title | Summary of risk | Gross Score | Existing Controls | Risk Score | Further Action Needed | RAG rating |
|----|-----------------------|--|---|--|--|---|--|
| | | | | <p>main Controller in place for learners' computers in training rooms.</p> <p>re phase 1 implementation is complete. Phase 2 has started to ensure security policies and procedures are reviewed, understood and followed by all and that systems are ready to get integrated, ensuring single sign on and 2 step verification methods.</p> <p>written activities within our own VLE systems are recorded, all activities are logged, and users are monitored.</p> | | | |
| 2 | External Partnerships | <p>The organisation does not establish effective partnerships with organisations such as the Local Authority, Police Prevent Team, DfE Regional Coordinator and others.</p> <p>The result is that the organisation is not fully appraised of national and local risks and does not have access to developing good practice advice or supportive peer networks.</p> | <p>20 Critical Very likely</p> | <p>Partnerships are in place with local authorities safeguarding boards – who we meet regularly as Training Provider Network meetings in Worcestershire and Birmingham. Designated safeguarding Leads keep up to date with local and regional risks plus peer support and good practice opportunities, then disseminate to team and</p> | <p>6 Substantial Unlikely</p> | <p>Designated Safeguarding Leads continue to monitor on a regular basis and work together with officers to ensure partnerships remain strong and contacts up to date.</p> | <p>Moderate Manage</p> |

| No | Risk Title | Summary of risk | Gross Score | Existing Controls | Risk Score | Further Action Needed | RAG rating |
|----|---------------------------|---|---|---|---|--|---|
| | | | | <p>inform governors on a quarterly basis.</p> <p>TDM safeguarding policy, shared by all, has external referral agencies details.</p> <p>TDM PDC Coaches provide advice and guidance to employers when learners start their apprenticeship programme and advise the employer of TDM Safeguarding & Prevent agenda.</p> <p>DSLs and safeguarding officers meet on a quarterly basis to standardise and share information, keeping up to date with contacts, safeguarding logs, etc.</p> | | | |
| 3 | Organisational Leadership | <p>Leaders within the organisation do not understand the requirements of the Prevent Statutory Duty or the risks faced by the organisation and the Duty is not managed or enabled at a sufficiently senior level.</p> <p>The result is that the organisation does not attach sufficient priority to Prevent Action plans (or does not have one) and therefore action to mitigate risks and meet the requirements of the Duty are not effective.</p> | <p>20</p> <p>Critical</p> <p>Very likely</p> | <p>Leaders are trained in Safeguarding and Prevent to the highest standard and meet regularly to ensure best practice.</p> <p>Leaders in Safeguarding organisation have conducted a mock audit related to safeguarding and have worked with Company leaders to improve the Company's safeguarding and prevent policies and procedures.</p> | <p>8</p> <p>Severe</p> <p>Unlikely</p> | <p>Yearly update required.</p> <p>Quarterly Safeguarding leads and officers' meetings to identify any actions for improvement.</p> | <p>Substantial</p> <p>Monitor</p> |

| No | Risk Title | Summary of risk | Gross Score | Existing Controls | Risk Score | Further Action Needed | RAG rating |
|----|------------------------------|---|-----------------------------------|--|---------------------------------------|---|----------------------------|
| | | | | Safeguarding policy has been updated and disseminated to all the staff, this includes the Prevent agenda. Staff receive regular training internally and externally. | | | |
| 4 | Staff training and awareness | Staff are not aware of the factors that make people vulnerable to radicalisation and terrorism and are unable to recognise the signs of vulnerability and therefore are unable or unwilling to refer concerns. Leaders and staff feel unable or unwilling to challenge extremist narratives or exemplify British Values throughout the organisation. Staff are unclear on how to deal with or refer concerns resulting in individuals not being supported and potentially radicalisation remaining unchecked. Staff do not take part in essential Safeguarding/Prevent update CPD or evidence records are not maintained. | 15 Critical Likely | Learners are trained in Prevent as part of their orientation into TDM. Staff are certificated in Prevent and Safeguarding as part of TDM Due diligence and monitored for their updates. TDM have a Prevent duty policy which is shared by all. This is given to all TDM new staff on day 1 induction into the company. TDM new team members also take the Prevent Channel course during their probationary period. L&D Reps provide advice and guidance to employers when they employ a new apprentice. On orientation course & TDM VLE safeguarding, Prevent and British Values are the core educational deliverables. TDM coaching staff (PDC & SKC) provide support/update/space to | 6 Substantial Unlikely | Regular sharing of best practice to ensure that all learner and staff training is kept up to date and relevant. And that staff and learners feel confident about talking about prevent and radicalisation issues. | Moderate Manage |

| No | Risk Title | Summary of risk | Gross Score | Existing Controls | Risk Score | Further Action Needed | RAG rating |
|----|---|---|--|---|--|-----------------------|------------------------|
| | | | | talk with learners & employers on all their workplace reviews. | | | |
| 5 | Speakers and events including part time staff | <p>Extremist organisations are given a platform to radicalise young people because the organisation has ineffective processes in the place for vetting speakers and events or other similar situations.</p> <p>Inappropriate or extremist materials are shared with learners (face to face or via weblinks) because insufficient checks are made of external speakers and materials that they promote or share.</p> | <p>15 Critical Likely</p> | <p>Any external speakers that are invited to speak to TDM learners need to go through a vetting process where TDM confirms suitability. So far speakers have come from trusted partnerships such as the British Computer Society and the University of Wolverhampton.</p> <p>No part-time/external staff.</p> <p>All TDM staff are DBS checked with enhanced checks, prior to working with learners – risk assessment process in place.</p> <p>Learners are not sent on event on behalf of TDM.</p> <p>TDM talks to employers about safeguarding duty at the onset of the programme.</p> <p>External web links that are sent to learners are vetted prior to circulation.</p> | <p>6 Substantial Unlikely</p> | | Moderate Manage |
| 6 | Welfare & Pastoral Care | The organisation does not provide effective welfare and pastoral support which results in learners (and staff) being | <p>15 Critical Likely</p> | Professional Development Coaching (PDC) staff provide support to learners &/employers. | <p>6 Substantial Unlikely</p> | | Moderate Manage |

| No | Risk Title | Summary of risk | Gross Score | Existing Controls | Risk Score | Further Action Needed | RAG rating |
|----|---------------------------|---|-----------------------------------|---|---------------------------------------|--|----------------------------|
| | | unsupported and the risk of vulnerabilities being exploited. | | PDC staff will signpost learners &/ employers to appropriate agencies for longer term/ongoing support as required in their local area. PDC supports the learner not only with professional development but also personal development, helping them embed into the working environment as well as their communities. This helps the PDC identify any concerning signs early on. | | | |
| 7 | Prayer & Faith Facilities | Requirements of learners (or staff) requiring faith support or the use of facilities are not met by the organisation resulting in individuals seeking external support of unknown suitability. As and when TDM grows there may be facilities (either prayer rooms or quiet space type facilities) provided, that are not effectively managed or supervised and become ungoverned spaces where radicalising, inappropriate or dangerous activities can take place. | 15 Critical Likely | The TDM professional Development Coach (PDC) is the trusted “go-to coach” that will provide the learners with suitable information, advice and guidance regarding any questions that the learner may need support with, including prayer and faith facilities. For example, if necessary, the PDC may facilitate conversations with mentors to help the learner plan for prayers at a suitable time and a suitable place. If a learner were to be given a quiet space to pray, this would need to | 6 Substantial Unlikely | As TDM grows, and when it has permanent premises (currently mostly virtual) managers should consider, discuss and solve offering faith (cross-faith) support as an access-to-support option. | Moderate Manage |

| No | Risk Title | Summary of risk | Gross Score | Existing Controls | Risk Score | Further Action Needed | RAG rating |
|----|---------------------|--|--|---|---|---|-----------------------------------|
| | | | | be effectively managed and supervised. | | | |
| 8 | Work-based learners | <p>The organisation does not have robust processes in place to protect work-based learners from the risks of radicalisation or views and practices contrary to British Values.</p> <p>Employers within work-based settings are unaware of issues relating to Prevent, the Statutory Duty and how to report concerns.</p> | <p>15 Critical Likely</p> | <p>The TDM Learning and Development Representatives (L&D reps), conduct an employer assessment with all new employers that engage with TDM programmes.</p> <p>This assessment identifies not only health and safety risks, but it also helps TDM assess safeguarding, prevent and the employers' knowledge of these and equality and diversity.</p> <p>The L&D rep is required to talk to employers and mentors about the safeguarding duties we all have. Especially where the employer is considering working with young people, they need to sign a "safeguarding commitment statement".</p> <p>Staff and learners are trained as part of their orientation into TDM about safeguarding and prevent. Staff are certificated in Prevent and Safeguarding.</p> | <p>8 Severe Unlikely</p> | <p>PDCs and all team must remain attentive and report any concerns to the Designated Safeguarding Leads.</p> <p>Learning and Development Representatives need to consult with designated safeguarding leads if they are unsure about the vetting process for new employers at the onset of the programme.</p> | <p>Substantial Monitor</p> |

| No | Risk Title | Summary of risk | Gross Score | Existing Controls | Risk Score | Further Action Needed | RAG rating |
|----|--------------------------|---|---|--|--|-----------------------|--|
| | | | | <p>Orientation course & TDM VLE have got various resources and activities to continue to promote and raise awareness of safeguarding, Prevent and British Values.</p> <p>The programme onboarding deliverables contain Prevent and Safeguarding as key topics to be discussed with learners and mentors. This is mainly done by the PDC; however, the skills and knowledge coaches are also trained to discuss these topics as and when the opportunity arises.</p> <p>TDM coaching staff provide support/update/space to talk with learners & employers on all their workplace reviews.</p> | | | |
| 9 | Promoting British Values | <p>The provider does not have a culture and ethos where British Values are celebrated, which leads to a culture of disrespect and intolerance and where tensions can flourish.</p> <p>Staff and learners do not understand BV (or feel confident about) and extremist views and narratives can flourish unchallenged.</p> | <p>20 Critical Very likely</p> | <p>Staff and learners are trained on British Values as part of their orientation into TDM.</p> <p>PD Coaches proactively develop British Values during coaching with learners.</p> <p>British Values education is incorporated into TDM's 5 x Professional Development Training Days.</p> | <p>6 Substantial Unlikely</p> | | <p>Moderate Manage</p> |

| No | Risk Title | Summary of risk | Gross Score | Existing Controls | Risk Score | Further Action Needed | RAG rating |
|----|------------------|---|--|---|---------------------------------------|-----------------------|----------------------------|
| | | | | On orientation course & TDM VLE British Values are a core educational deliverable. All TDM coaching (SKCs & PDC) staff provide support/update/space to talk with learners & employers on all their workplace reviews. | | | |
| 10 | On-site Security | The organisation does not have sufficient security of its premises and learners are targeted by individuals or groups seeking to share their extremist views or endanger their personal safety. On site dangerous or hazardous substances are not kept secure and are allowed into the possession of individuals or groups seeking to use them unlawfully. | 20 Critical Very likely | TDM offices need authorisation to be accessed. There is a receptionist plus key fob-only access to TDM training facilities. No charities (or similar speakers) are entertained within TDM to promote their services. Individual staff may support a charity, but this is not shared or accessed by learners. Health and Safety, plus Health and Safety (COSHH) policy, procedure and regulations are in place. | 6 Substantial Unlikely | | Moderate Manage |

Appendix 2 : Risk Assessment for a Critical Incident + Action Plan

Risk Assessment for a Critical Incident

| | | IMPACT | | | | |
|------------|----------------|--------|----------|-------------|--------|----------|
| | | 5 | 10 | 15 | 20 | 25 |
| LIKELIHOOD | Almost certain | 5 | 10 | 15 | 20 | 25 |
| | Very Likely | 4 | 8 | 12 | 16 | 20 |
| | Likely | 3 | 6 | 9 | 12 | 15 |
| | Unlikely | 2 | 4 | 6 | 8 | 10 |
| | Improbable | 1 | 2 | 3 | 4 | 5 |
| | | Minor | Moderate | Substantial | Severe | Critical |

| ACTION | RISK SCORE | RATING | RAG |
|----------------------|------------|-------------|-----|
| Make do | 1-2 | Minor | G |
| Manage | 3-6 | Moderate | A |
| Monitor | 8-12 | Substantial | A |
| Mitigate | 15-16 | Severe | A |
| Urgent action | 20-25 | Critical | R |

| No | Risk Title | Summary risk | Gross Risk Score | Existing Controls// Actions | Residual Risk Score | Further Action Needed | RAG rating |
|----|-------------------------------|---|---|---|--|---|---|
| 1 | Building security is breached | <p>Risks: Learner and staff safety; Data safety compromised</p> <p>Malicious people may enter the building behind someone who is entering and when receptionist is not paying attention.</p> <p>These people may be a risk to the data security and the learners safety.</p> | <p>16</p> <p>Severe</p> <p>Very</p> <p>Likely</p> | <p>Sign-in register maintained at reception & telephoned when learners arrive & then collected by staff.</p> <p>Receptionist advises if people are entering the premises unchecked.</p> <p>Training rooms are monitored by coaches and at least a member of the support team at all times.</p> <p>Cameras are installed in all corridors to monitor any risks.</p> <p>Class registers maintained</p> <p>Single point of entry to building</p> <p>Key fob access only to TDM</p> | <p>6</p> <p>Substantial</p> <p>Unlikely</p> | Continue to monitor good practice and key reminders for team on building security | <p>Moderate</p> <p>Manage</p> |

| No | Risk Title | Summary risk | Gross Risk Score | Existing Controls// Actions | Residual Risk Score | Further Action Needed | RAG rating |
|----|--------------------------------------|---|---|---|--|---|---|
| 2 | Strangers identified on site | <p>Risks: Learner and staff safety; Data safety compromised</p> <p>Visitors that are not wearing a badge may say that they were given one and that it must have dropped whilst walking on corridors. TDM staff may believe this story and not enforce the policy to wear the badge and give a replacement one.</p> | <p>16</p> <p>Severe</p> <p>Very Likely</p> | <p>Reception maintains a sign-in log for all visitors to site, time in and time out.</p> <p>All visitors to report to reception signage in place.</p> <p>Key fob access only to TDM</p> <p>Where any individual and visitors in particular are not wearing ID they must be escorted to reception and made to sign in where the purpose of their visit needs to be explained. Then the member of staff must corroborate the learners identity by checking on TDM's systems and asking key questions such as DOB/ Name of coach etc.</p> <p>If any visitor is abusive or creates a nuisance the member of staff must not take direct action, but MUST send for help, or inform a colleague on-site as soon as this is possible.</p> | <p>6</p> <p>Substantial</p> <p>Unlikely</p> | <p>Monitor and manage the use of lanyards by all staff and learners.</p> <p>Monitor action to ensure the process is followed through.</p> <p>TDM Staff and learners wear lanyards at all times- need to enforce this (at all times) or politely request learners must go to reception.</p> <p>Reports misconduct to manager.</p> <p>Identifying why unknown visitors to TDM offices have been allowed into premises. Must be returned to reception to identify which company they are visiting.</p> | <p>Moderate</p> <p>Manage</p> |
| 3 | Online safety for learners and staff | <p>Risk: Cyber-attack on systems</p> <p>Data Security breaches</p> <p>Suspicious login into the TDM Virtual learning environment or Suspicious mail received by staff or learners.</p> | <p>20</p> <p>Critical</p> <p>Very likely</p> | <p>Information security policies and procedures in place.</p> <p>Orientation and coaching for learners cover online safety and cyber security.</p> | <p>6</p> <p>Substantial</p> <p>Unlikely</p> | <p>Learners attending virtual learning environment can also support with reporting of any suspicious activity be it online or onsite.</p> | <p>Moderate</p> <p>Manage</p> |

| No | Risk Title | Summary risk | Gross Risk Score | Existing Controls// Actions | Residual Risk Score | Further Action Needed | RAG rating |
|----|------------|---|------------------|---|---------------------|-----------------------|------------|
| | | <p>This can cause serious risk to data systems and stealing of company / learners/employers' data.</p> <p>Staff may receive mail with unknown attachments and open it resulting in cyber attack to hardware. This can also happen from mobiles.</p> <p>Company not using strong systems that adhere to secure protocols for data transfer , risking the loss of data and breach of data protection.</p> | | <p>PDC and support team on call for any learners ' online issues/queries.</p> <p>Information security policies and procedures are updated at least once a year. Staff must do a refresher read on the updated policies and procedures every year.</p> <p>Dedicated Tech team looking at server activity and with access to server back end platforms at any time via Azure.</p> <p>Managers monitor compliance with policies and procedures and use the HR process to discipline staff</p> <p>Small class sizes allow trainers and coaches to be able to safely manage the virtual classroom, if they notice that there is a person in attendance that is not in the bookings system, they must request that person leave and enforce leaving the room if necessary. Trainers/coaches have got the necessary permissions to do this and if they believe it necessary.</p> | | | |

| No | Risk Title | Summary risk | Gross Risk Score | Existing Controls// Actions | Residual Risk Score | Further Action Needed | RAG rating |
|----|--|---|---|---|--|---|---|
| | | | | <p>TDM internal systems and systems we use to connect to ESFA and DFE are all secure</p> <p>For example, Tribal for our Maytas system, has been an ISO27001 certified organisation since 2009 and the Company we utilise for server space is ISO27001 certified. Enrola system is set up in the AWS server which is ISO 27001 certified as well.</p> | | | |
| 4 | Street violence, protest or civil unrest in locality | <p>Risks: Learner and staff safety;</p> <p>Street violence can cause damage to building if people throw things at windows.</p> <p>Learners and staff are at risk of harm by others. This could be chemical weapons as well as violence</p> | <p>8</p> <p>Severe</p> <p>Unlikely</p> | <p>Premises are secure environments only accessible to those with a fob. It is not likely that a civil unrest will enter the premises, but staff members must advise learners to stay away from the windows in case of attacks on windows.</p> <p>Mobiles and phones are available to staff members to use to call in for help.</p> <p>Emergency signs and staff training to call police and remain in building & await for police instructions</p> <p>All staff that work with learners have got company mobile to call for support if needed.</p> | <p>6</p> <p>Substantial</p> <p>Unlikely</p> | Continue to manage and monitor process/procedures understood and followed by all. | <p>Moderate</p> <p>Manage</p> |

| No | Risk Title | Summary risk | Gross Risk Score | Existing Controls// Actions | Residual Risk Score | Further Action Needed | RAG rating |
|----|--|--|---|--|--|--|---|
| 5 | Malicious attacks on IT systems , including fraud and malicious/inadequate use of IT equipment for gaming / gambling purposes. | <p>Risks: Cyber attacks Compromise Financial Reputation and public trust. Potential vulnerabilities unearthed with connection to gaming/gambling sites.</p> <p>This may lead to an employee not following procedures correctly and their passwords being compromised. This can lead to people getting hold of their devices remotely.</p> | <p>20 Critical Very likely</p> | <p>Firewalls and Security protocols in place.</p> <p>Continuous monitoring of the server and azure system (network performance)</p> <p>24/7/ support desk for critical incidents -with an immediate response strategy in place (we also offer this service out to other customers).</p> <p>Business Continuity plan in place</p> <p>Computers are connected to ADS server. Remotely controlled by azure managed by the tech team at TDM.</p> <p>Information security policy and procedures understood and followed by all.</p> | <p>12 Severe Likely</p> | <p>Tech leader Ian needs to start training Ben on how to support with the regular updates and checking for networking vulnerabilities on a continuous basis so that we can have more team members trained to the level of cyber security present at this point in time.</p> <p>Plan in place for CPD commencement for Ben once fully back from furlough.</p> | <p>Monitor Substantial I</p> |

| No | Risk Title | Summary risk | Gross Risk Score | Existing Controls// Actions | Residual Risk Score | Further Action Needed | RAG rating |
|----|--|--|--|---|---|---|---|
| 6 | Natural disasters: Flood, severe weather, wild fires, space weather, earthquakes | <p>Risks: Learner and staff safety are at risk</p> <p>Learners and staff do not know how to and where to evacuate in case of a building emergency.</p> <p>Learners and staff panic and create chaos rather than order at critical incident point.</p> | <p>8</p> <p>Severe</p> <p>Unlikely</p> | <p>Fire evacuation drills take place at least twice a year. Learners are included if attending that day.</p> <p>Weekly fire alarm checks.</p> <p>No real current risk of floods since councils have put flood barriers in place.</p> <p>Learners contacted by telephone if delivery unable to take place.</p> <p>Plan B to deliver face to face virtually (if the session was being run face to face in the training room, but not possible due to severe weather conditions).</p> <p>Business Continuity plan in place</p> | <p>8</p> <p>Severe</p> <p>Unlikely</p> | <p>As part of the enrolment process into the training courses add to the notifications that in the event of severe weather warnings the courses may be delivered online and therefore learners must have a laptop and internet connection or let TDM know if this may be a problem.</p> <p>TDM has a laptop loan procedure that can be delivered to the learners premises if in the West Midlands.</p> <p>Continue with awareness raising for everyone's safety</p> | <p>Monitor</p> <p>Substantial</p> <p>I</p> |
| 7 | Medical / other major on-site incident | <p>Risks: Learner and staff safety;</p> <p>Lack of understanding of what to do in the event of a medical emergency may contribute to panic and not know what to do.</p> <p>Lack of training for staff may contribute to doing the wrong thing and thus putting individuals at more risks.</p> | <p>10</p> <p>Critical</p> <p>Unlikely</p> | <p>First training for key staff that attend training rooms more regularly. And refresher training at least every three years.</p> <p>Staff know how to</p> <p>Call first aid officer</p> <p>Call emergency services</p> | <p>8</p> <p>Severe</p> <p>Unlikely</p> | <p>Continue to raise awareness amongst students</p> <p>Continue to train staff</p> <p>Monitor systems and processes</p> | <p>Monitor</p> <p>Substantial</p> <p>I</p> |

| No | Risk Title | Summary risk | Gross Risk Score | Existing Controls// Actions | Residual Risk Score | Further Action Needed | RAG rating |
|----|---|---|-------------------------------------|---|----------------------------------|---|--------------------------------|
| | | | | Complete Health and Safety/Accident book if at TDM premises. Report incidents | | | |
| 8 | Criminal or criminal gang activity identified on-site. E.g. Knife crime or incident involving firearms identified on-site | Risks: Learner and staff safety; that can cause harm to staff or learners | 10 Critical Unlikely | Call Police and emergency services Remain in TDM training premises if safe to do so If there is need to evacuate follow the lead of the trainer/TDM support officer Staff know how to: Remain calm and call emergency services Remain in TDM training room if needed. Call security and emergency services Whilst this is unlikely due to the initial security before entering premises if this happened learners may not know how to react and panic. | 8 Severe Unlikely | Ensure that there are posters displaying in TDM training rooms as to how to react if this eventuality occurs. (Although it is very unlikely that it will occur at TDM premises due to the security checks that need to happen before entering the premises. Also low crime rate in this area) | Monitor Substantial |
| 10 | Fire on-site or adjacent buildings | Risks: Learner and staff safety; There may be an attempted arson attack during the working day. There may be a fire that starts from someone smoking in the restrooms. | 10 Critical Unlikely | Learners are introduced to the non smoke policy at the onset of every lesson. Staff have been trained to: Remain calm and call emergency number | 8 Severe Unlikely | Ensure that there are posters displaying in TDM training rooms as to how to react if this eventuality occurs. | Monitor Substantial |

| No | Risk Title | Summary risk | Gross Risk Score | Existing Controls// Actions | Residual Risk Score | Further Action Needed | RAG rating |
|----|--|---|--|---|--|--|---|
| | | | | <p>Remain in TDM training room</p> <p>Call security and emergency services if necessary.</p> <p>If necessary and if place is inaccessible , learners booked to attend training will be called and given the opportunity to continue the training online or rebook to the earliest opportunity.</p> <p>A major fire on-site during the night renders the site inaccessible.</p> <p>Business Continuity plan in place and enacted</p> | | | |
| 11 | Bomb threat received | <p>Risks: Learner and staff safety;</p> <p>The provider receives a message during the working day stating a bomb has been set on site and it is not known whether this is genuine or hoax.</p> | <p>10</p> <p>Critical</p> <p>Unlikely</p> | <p>Staff and PDCs trained to remain calm and call police and safeguarding leads</p> <p>follow the police instructions</p> <p>Evacuate building</p> <p>Communicate with employers if event needs to be cancelled or run remotely.</p> | <p>8</p> <p>Severe</p> <p>Unlikely</p> | Ensure safeguarding and prevent policy have procedures in place. | <p>Monitor</p> <p>Substantial</p> <p>I</p> |
| 12 | Transport disruption due to security issue or accident | <p>Risks: Learner and staff safety;</p> <p>Local transport is disrupted due to bomb alerts or terrorist activity.</p> <p>Major road traffic accident causes disruption to site access and egress.</p> <p>Learners may still attend training rooms due to being unaware of dangers.</p> | <p>8</p> <p>Severe</p> <p>Unlikely</p> | <p>Support team member works from office at all times, this person helps reports on the security risks.</p> <p>Communicate with employers/learners if event needs to be cancelled or run remotely.</p> | <p>6</p> <p>Substantial</p> <p>Unlikely</p> | Continue with staff and learners awareness raising | <p>Moderate</p> <p>Manage</p> |

| No | Risk Title | Summary risk | Gross Risk Score | Existing Controls// Actions | Residual Risk Score | Further Action Needed | RAG rating |
|----|--|---|--|--|---------------------------------------|---|--------------------------------------|
| | | | | Business Continuity plan in Actions : Remain alert and call the police if in doubt of safety. | | | |
| 13 | Major accidents: System failures, electricity failure, transport accidents | Risks: Learner and staff safety; System failures could create dangerous areas, such as where there are electric cables that might be compromised. | 8 Severe Unlikely | Staff work from home/TDM other office Learners communicated with. Communicate with employers if event needs to be cancelled or run remotely. Business Continuity plan in place | 6 Substantial Unlikely | | Green |
| 14 | Major disease outbreak in community or involving learners and staff | Risks: Learner and staff safety; A serious viral infection is identified on site. Learners are required to attend training face to face when covid-19 is not under control by government . Big groups gather and spread the virus around. | 20 Critical Very likely | Follow Government advice through Contain > Delay > Mitigate stages Directors to check Government advice on a regular basis and respond immediately, informing learners and employers where appropriate . If infection is identified on site: <ul style="list-style-type: none"> Affected person must self-isolate All persons in contact with that person must self isolate TDM must contact emergency services | 12 Severe Likely | Directors to track coronavirus cases in Worcester and WMCA at: https://www.gov.uk/government/publications/covid-19-track-coronavirus-cases Strategic Response in "Mitigate" phase: <ul style="list-style-type: none"> Work from home policy & alternative delivery model for each delivery role | Monitor Substantial I |

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|----|------------|--------------|------------------|---|---------------------|--|------------|
| | | | | <p>immediately and follow advice.</p> <p>At present TDM is following Dfe advice and continue to successfully deliver remote training and coaching.</p> <p>Premises have been risk assessed and we have certified as a covid-19 safe place to work, therefore meaning only one to one or a maximum of 3 to 1 ratio (learners to tutor) can be present at TDM training premises during the covid-19 pandemic and endemic.</p> | | <ul style="list-style-type: none"> • BigBlueButton Training eModeration skills training in place and successfully delivering. • Remote working and training robust system. Tdm got Cyber Eseentials certification from the National Cyber Security Centre. | |

Appendix 3

Emergency Contact Numbers

| Organisation | Contact number |
|---------------------------|----------------|
| UK Anti-Terrorist hotline | 0800 789 321 |
| Emergency Services | 999 |
| Local Police | 101 |
| Fire Brigade | 112 or 999 |
| Ambulance | 999 |

Emergency numbers

First responders, public utility companies, Education and Skills Funding Agency.

Please also see our safeguarding policy

| Name | Contact Name | Phone |
|--|---|----------------------|
| Company Director | Derrin Kent | 07792569415 |
| Company Director | Elizabeth Hoyos | 07947344042 |
| Education and Skills Funding Agency (ESFA) | Government Agency Address: Cheylesmore House, 5 Quinton Rd, Coventry CV1 2WT | <u>0370 000 2288</u> |
| Contact National Grid for free | 24-hour emergency helpline | 0800 40 40 90 |
| If you smell gas or are worried | Emergency Number (Follow | 0800 111 999 |

| | | |
|---|--|---------------|
| about gas safety, phone the National Gas Emergency Number | the steps below: Open doors and windows to ventilate the property) | |
| Severn Trent Water | Support- Emergencies | 0800 783 4444 |
| Kidderminster Hospital | Kidderminster Hospital | 01568 823424 |
| Worcester Hospital | Worcester Hospital | 01905763333 |
| Birmingham Hospital | Queen Elizabeth Hospital | 01216272000 |
| West Mercia Police | Police Support | 0300 333 3000 |
| Worcester Fire Service Station | Fire Service | 01905 725030 |
| West Midlands Fire Service | Fire Service | 03300589000 |

TDM Safeguarding Staff Contact Details

Please also see our [safeguarding policy](#)

| Name | Role | Email | Phone |
|------------------|--|--|--------------------------------|
| Stuart O'Rourke | Designated Safeguarding Lead | stuart@tdm.co.uk | 03331010040 (Extension 812) |
| Jennifer Johnson | Deputy Designated Safeguarding Lead Designated Safeguarding Officer | jenny@tdm.co.uk | 0333 101 00 74 |
| Melanie Eastwood | Safeguarding Officer-Advisory role (In Training) | mel@tdm.co.uk | 07432632269 |
| Tabitha Jones | Safeguarding Officer Advisory role (In Training) | tabi@tdm.co.uk | 07939530735 |
| Derrin Kent | Governor for Safeguarding | derrin@tdm.co.uk | n/a |
| Kim Cook | Deputy Governor for Safeguarding | kim@hwstpa.co.uk | n/a |