

Prevent

1. Purpose and content

The purpose of this appendix of the College Safeguarding Policy is to provide a clear set of guidelines to staff regarding the actions they must take to contribute to the College duty to have due regard to preventing people from being drawn into terrorism or extremism. This includes those immediate actions they must take if they become aware that a learner or member of staff presents a threat to themselves and/or others.

2. Definitions

The UK Government (2015) define terms as:

- **Fundamental British Values:**
 - **Democracy:** your vote and voice counts – you can make a difference
 - **The rule of law:** laws apply to everyone
 - **Individual liberty:** you are entitled to your view and to your freedom of expression and thought.....
 - **Mutual respect and tolerance for those with different faiths and beliefs:** ...and so is everyone else
- **Radicalisation:** The process by which a person comes to support terrorism and forms of extremism
- **Extremism:** Vocal or active opposition to fundamental British values *including calls for the death of members of the British armed forces*
- **Entryism:** Extremist individuals, groups and organisations consciously seeking to gain positions of influence to better enable them to promote extremist agendas
- **Channel:** A programme which focuses on providing support at an early stage to people who are identified as being vulnerable to being drawn into terrorism. The programme uses a multi-agency approach to protect vulnerable people by:
 - Identifying individuals at risk
 - Assessing the nature and extent of that risk
 - Developing the most appropriate support plan for the individuals concerned
- **Silver Group:** A local advisory forum to share information on and intelligence about current potential extremist risks in the local area and actions being taken by local agencies to reduce or remove extremism and terrorist activity
- **Ofsted:** Office for Standards in Education

3. Legislative framework and rationale

The Government deems that the UK is currently at 'Severe' risk of international terrorism. Section 26 of the Counter-Terrorism and Security Act 2015 (the Act) places a duty on certain

bodies, including further education colleges, to have due regard to the need to prevent people from being drawn into terrorism. The duty means the College needs to demonstrate an awareness and understanding of the risk of radicalisation; both within the College and locally; and put appropriate measures in place. This includes:

- establishing or using existing mechanisms for understanding the risk of radicalisation
- ensuring staff understand the risk and building College capability to deal with it
- communicating and promoting the importance of the duty
- ensuring staff implement the duty effectively

4. College response

The Governing Body is responsible for ensuring clarity of culture, mission and values in the College and is committed to ensuring College safeguarding (including Prevent) arrangements are developed with reference to the policies and procedures of the local authority, all relevant legislation and guidance, as well as good practice identified in the sector; including that shared by Ofsted. The governing body has identified, amongst other risks, the particular risks associated with entryism and has actions in place to ensure this is prevented. This includes the vetting of potential governors and the suspension of governors in certain circumstances.

5. Other key College actions are:

- **Implementation of a Prevent risk assessment plan:**
 - Actions are fully reviewed and revised at least yearly by the College Designated Lead for Safeguarding
 - Progress on the plan is reported to, and evaluated by, the College Safeguarding Group which is chaired by the Group Vice Principal Curriculum Development and to the Governing Body through FE Corporation
 - This risk assessment plan includes actions relating to external speakers, IT policies, the learner voice, subcontractors and the College tutorial system
- **Training in Prevent:**
 - The College has established a mandatory safeguarding training schedule that includes a safeguarding (including Prevent) induction, a face to face yearly update training on safeguarding (including Prevent) and completion of the online Education and Training Foundation Prevent module relevant to each group of workers within the College (see Appendix I)
 - The training includes raising awareness of local threats and the following potential signs and symptoms that may indicate a person is at risk of being drawn into terrorism:
 - **Specific influences:** e.g. friends, family, online contacts and recent conversion to a cause/religion

- **Personal vulnerability:** e.g. identity confusion, victim of/witness to hate crime and family conflict over beliefs/lifestyle
 - **Intolerance & rhetoric:** e.g. extremist views in relation to particular groups
 - **Changes in appearance or behaviour:** e.g. adopting the dress of particular groups, moving away from previous friends who are not connected to the group and spending much more time online
 - **Possession of material/symbols** that are associated with an extremist cause; e.g. swastika
- **Embedding of fundamental British Values into the College culture:**
 - All staff must promote the ethos of fundamental British values in their day to day work and curriculum staff must ensure these values are promoted to learners through teaching, learning and assessment.
 - Staff and learners need to have an understanding and appreciation of the culture and needs of others and understand how to ensure every learner feels they have a place in the College community. Curriculum staff must also ensure learners understand how to keep themselves safe from the risks of radicalisation and terrorism through the tutorial programme. Support and guidance in delivery of the tutorial programme in relation to fundamental British values and Prevent is available from [Student Services](#)
 - Staff and learners must promote fundamental British values. Poor behaviour will be dealt with in accordance with staff and Behaviour Management processes and referral to the Police and the Channel panel if appropriate
 - College managers, who observe teaching, learning and assessment as part of their role, must ensure they monitor the promotion and embedding of fundamental British values and take necessary action in relation to concerns in a timely way
 - **Co-operation with the police and local authorities:**
 - The College is represented on existing multi-agency forums and will cooperate with external bodies wherever appropriate
 - **Information sharing and referral:**
 - The College has robust procedures both internally and externally for sharing information about vulnerable individuals:
 - Following a notice-check-share approach; all concerns, and queries relating to radicalisation and terrorism, must be urgently referred to a Designated Person for safeguarding following the referral routes outlined in Appendix A (Child and Adult Protection) and Appendix Q (Allegations and Whistleblowing) of the Safeguarding Policy
 - The Designated Person will refer cases, as appropriate to Channel or the Police, and may also share, and receive, information with/from other institutions and key partners, such as the local Prevent Silver group and the Police community safety team

- If a member of staff identifies someone may already be engaged in illegal terrorist-related activity this must be immediately referred to the Designated Lead for safeguarding or in his absence the Principal or the most senior member of staff available so the police can be immediately alerted by phoning 999
- **College policies and procedures:**
 - Policy owners must review policies for inclusion of relevant Prevent actions and take appropriate action where needed in a timely way to ensure full compliance with the College Prevent duty
- **Learner voice:**
 - The Head of Quality will monitor learners' understanding of how to stay safe from the risks associated with radicalisation, terrorism and extremism through focus groups and surveys
- **Fundraising:**
 - The College takes its responsibility to ensure that fundraising does not provide funding to extremist groups or fund terrorist activities seriously
 - Fundraising activities are managed by either the College Staff Association, by the Student Services team, or by a Curriculum Department (for example the Prince's Trust) to support a community venture or charity
 - All fundraising must include a review of the uses of the funds raised with any areas of concern referred to the Finance Director
- **Online and e-Safety**
 - The College has policies relating to the use of its IT systems and devices both on and off College premises. IT policies and procedures contain specific reference to the Prevent duty
 - The College uses filtering as a means of restricting access to harmful content. Surveillance software is also in place
 - Full guidance is available in the ILT and E-Safety Regulations and Social Media Policy. These are available on the ICLT section of the policies and procedures site on the staff gateway
- **Outside organisation promotional materials**
 - The College takes its responsibility to ensure that publications and promotional materials that are brought into its campuses do not promote extremist views, or are supportive of terrorist organisations very seriously.
 - All staff are aware that there is a requirement to be vigilant of any physical marketing materials and escalate concerns to the Deputy Designated Officer at the campus where materials have been identified.
 - The Designated Safeguarding Lead will make the final decision on what action to take in the event that the Deputy Designated Officer requires further guidance.

- **Subcontractors**
 - The College works with a number of subcontractors in its delivery of education
 - Subcontractors complete an annual application to work with the College. In this application they are required to provide assurance that they will adopt and promote fundamental British values within their delivery, and that they will not promote or engage in extremist related activities or propaganda
 - All aspects of subcontractor compliance with the Prevent duty are overseen by the Director of Business Development
- **Visitors and visiting speakers/events**
 - Staff must ensure all visitors to the College adhere to the requirements of the Visitors to College Premises policy. This policy is available on the facilities section of the policies and procedures of the staff Gateway/Sharpoint site
 - Visiting speakers can provide a greatly enhanced experience to learners, and can contribute significantly to the College tutorial programme. Nevertheless, the College takes seriously its responsibility to balance the need to allow debate of controversial issues with the duty to prevent those promoting extremist views from influencing College learners
 - All staff organising a visiting speaker or event must carry out a risk assessment that includes an online search of publically available information relating to both the speaker and the organisation they represent as appropriate. The risk assessment must be reviewed by the appropriate budget holder who will discuss any concerns with the Designated Lead for Safeguarding prior to approval/rejection
 - Visiting speakers who are deemed to have extremist views which pose a safeguarding risk must not be invited into the College
 - All visiting speakers must sign in as a visitor and be accompanied by a member of staff at all times. Staff must interject or stop an event if they feel that the speaker is promoting extremist views or inequality in any form

6. Roles and responsibilities of specific College staff

- **Designated Lead for Safeguarding:**
 - Liaising with local Prevent Coordinators
 - Attending the Silver Group Partnership
 - Ensuring the effective use of the CHANNEL, and police, referral processes
 - Overseeing the training of staff
- **Safeguarding Officers:**
 - Referring concerns to appropriate agencies
 - Supporting individual learners who are working with agencies
 - Supporting groups of learners or individuals who have been impacted by or exposed to any activity which might provide an opportunity to any extremist

group. This might take the form of mentoring, monitoring or providing access to other agencies

- Supporting and delivering training to staff
- Student Services Manager:
 - Providing training and resources to promote fundamental British values within the tutorial programme
 - Ensuring planned cultural and religious events are well conceived, effectively managed, and give consideration to the College Prevent duty
 - Monitoring the College faith and contemplation room. This room is available for use by individuals of any denomination and accessible at all times. It is checked weekly by a member of the Student Services team to ensure that extremist literature is not displayed.
 - Monitoring and oversight of the activity of the Student Union
 - Monitoring and oversight of other formal groups or societies within the student body
- Head of Infrastructure:
 - Ensuring a robust disaster management/emergency plan is in place and will be responsive to a terrorist threat
 - Maintaining a proportionate and appropriate level of campus security including the enforcement of appropriate ID for staff, learners and visitors
 - Ensuring that the IT hardware and software provides filtering against, and monitoring of, extremist and terrorist activity
 - Ensuring external lettings of College premises adhere to Prevent duty requirements
- Finance Director:
 - Ensuring funds raised or generated by the College are not used to fund terrorist activity
- Director of the Business Development Unit
 - Ensuring College sub-contractors discharge their Prevent duty in line with requirements

Linked Policies - Facilities – [External Lettings](#)