

Prevent Strategy

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Purpose

PREVENT is one of the four core elements of the Government's counter terrorism strategy known as CONTEST. It is built around four strands.

Four PREVENT strands.

1. Pursue

To stop terrorist attacks in this country and against our interests oversees. This means to:

- detect and investigate threats at the earliest possible stage
- disrupt terrorist activity before it can endanger the public
- and, wherever possible, prosecute those responsible.

2. Protect

To strengthen our protection against a terrorist attack in the UK or against our interests overseas and so reduce our vulnerability.

3. Prepare

To mitigate the impact of a terrorist attack where that attack cannot be stopped. This includes work to bring a terrorist attack to an end and to increase our resilience so we can recover from its aftermath.

4. Prevent

To prevent people becoming terrorists or supporting terrorism.

Legislative Framework and Rationale

Section 21 of the Counter Terrorism and Security Act 2015 (the Act), Schedule 3 to the Act, places a duty on local authorities and schools and colleges to have "due regard to the need to prevent people from being drawn into terrorism". The Act states that the authorities (including Further Education institutions) subject to the provisions must have regard to this guidance when carrying out the duty.

Preventing radicalisation is part of our wider safeguarding duty. We recognise that the College plays a significant part in the prevention of this type of harm. Education about PREVENT is through our ASPIRE programme and the encouragement of 'British Values' is included in the curriculum.

The College's PREVENT work is intended to deal with all kinds of terrorist threats to the UK and intervene where possible to prevent vulnerable students from being radicalised. The purpose of PREVENT is to safeguard and support vulnerable people to stop them from becoming radicalized, terrorists or supporting terrorist organisations. As part of our commitment to safeguarding and child protection we fully support the government's PREVENT Strategy.

Threats to safety and security originate from a range of extremist groups. Extremist groups pose a continued threat to our safety and security.

Extremism is defined by the UK Government 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" (UK Government, 2015).

The College's PREVENT work depends on effective partnership. To demonstrate effective compliance with the duty, the College has ensured productive co-operation with the Police and local authorities

and co-ordination through existing multi-agency forums such as North East Lincolnshire Multi Agency Prevent (MAP) Board. This strategy has been discussed with the Humberside Police Prevent Team. (Email: Prevent@Humberside.pnn.police.uk)

Critically, the College views PREVENT as an additional aspect of its already well-established Safeguarding Policies and Procedures. The Safeguarding Team is appropriately trained and can offer advice, support and information to other staff. All staff have completed the PREVENT awareness training alongside statutory safeguarding training and regular updates on emerging themes and local risks.

PREVENT Duty Objectives

To promote, implement and monitor the College's responsibilities under the PREVENT duty to students, staff, governors, subcontractors and visitors to the College.

To uphold and promote the fundamental principles of British values, including democracy, the rule of law, individual liberty and mutual respect and tolerance of those with different faiths and beliefs.

To exemplify British Values in governance, leadership, teaching and behaviours.

To identify and provide support to students and staff who may be at risk and develop appropriate sources of advice and guidance.

To ensure that staff and students are aware of their roles and responsibilities in preventing extremism and radicalisation.

To ensure safe internet filters are in place and ensure our students are educated on cyber safety.

Staff training

The College recognises the need to provide appropriate training for staff involved in the implementation of this duty. Completion of PREVENT awareness training is compulsory for all staff before their employment commences and revisited when updated. All staff also receive regular PREVENT in-house training at least annually, placing the Prevent agenda within a local context and cascading information from the Multi-Agency Prevent (MAP) Board meetings.

The College Leadership Team and the Safeguarding Team have received training to understand the Government rationale for PREVENT and the channels for further action and referral (updated as required). The PREVENT Lead and DDSLs sit on the North East Lincolnshire Multi Agency Prevent (MAP) Board.

All College staff should understand what radicalisation means and why people may be susceptible to it. They need to be aware of what we mean by the term "extremism" and the relationship between extremism and terrorism.

Staff should feel confident in identifying students at risk and act proportionately. Staff should know how to report illegal or harmful information, articles, pictures, images, websites or videos that promote or encourage violence.

Staff need to know what measures are available to prevent people from becoming terrorists or supporting terrorism and how to challenge the extremist ideology that can be associated with it. They need to understand how to obtain support for people who may be being exploited by radicalising influences or extremist organisations.

Channel is a multi-agency safeguarding programme which works to support vulnerable people from being drawn into extremism and provides a range of support such as mentoring, counselling and assistance with education, employment and training. Channel focuses on early intervention to protect vulnerable people from being radicalised.

The College works with external partners to ensure that appropriate training programmes are delivered to staff and governors.

Staff training programmes will ensure that the following learning outcomes are addressed:

- all staff should understand the process and policies in place when vulnerability has been identified
- all staff are aware of the internal referral systems if they have a concern
- all staff should know when referrals should be made to the Channel programme, and how to use College processes to do this
- all staff should know how and where to get additional advice and support.
- all staff are aware of the local context in terms of risk levels for radicalisation
- all staff are aware of the threat of online radicalisation, particularly after lockdowns and social isolation.

Information Sharing

The PREVENT programme must not involve any covert activity against people or communities. However, specified authorities may need to share personal information to ensure, for example, that a person at risk of radicalisation is given appropriate support (for example on the Channel programme). Information sharing must be assessed on a case-by-case basis and is governed by legislation. To ensure the rights of individuals are fully protected, the College ensures that information-sharing agreements are in place at a local level.

When considering sharing personal information, the College should take account of the following:

- **Necessity and proportionality**: personal information should only be shared where it is strictly necessary to the intended outcome and proportionate to it. Key to determining the necessity and proportionality of sharing information will be the professional judgement of the risks to an individual or the public
- **Consent:** wherever possible the consent of the person concerned should be obtained before sharing any information about them
- **Power to share:** the sharing of data by public sector bodies requires the existence of a power to do so, in addition to satisfying the requirements of the Data Protection Act 1998 and the Human Rights Act 1998.
- Data Protection Act and the Common Law Duty of Confidentiality (General Data Protection Regulation GDPR): in engaging with non-public bodies, the specified authority should ensure that they are aware of their own responsibilities under the Data Protection Act.

Disclosure and Referrals

Where a member of staff has any concerns about a student, as a matter of urgency they should refer the matter to the **Designated Safeguarding Lead or Deputy Designated Safeguarding Leads or a member of the Safeguarding Team or College Leadership Team.** There may be some circumstances where the College, in the course of PREVENT related work, identifies someone who may already be engaged in illegal terrorist-related activity. People suspected of being involved in such activity should be referred to the Police by the Designated Safeguarding Lead or Deputy Designated Safeguarding Leads.

PREVENT Compliance

The College fully recognises its role in preventing people becoming terrorists or supporting terrorism, which includes not just violent extremism but also non-violent extremism, which can create an atmosphere conducive to terrorism and can popularise views that terrorists exploit.

The College understands that radicalisation is usually a process not an event. During that process, behaviours as well as opinions are likely to change. These changes may be apparent to the friends, families and work colleagues of the person concerned.

It is a condition of funding that as a further education provider, the College must comply with relevant legislation and any statutory responsibilities associated with the delivery of education and safeguarding of children and young adults.

The *Prevent* Strategy is to be implemented in a proportionate and risk-based way ensuring that opportunities in the Further Education curriculum are used to promote the British values to learners. British values are defined as "democracy, the rule of law, individual liberty and mutual respect and tolerance for those with different faiths and beliefs". These values are clearly mapped in the ASPIRE programme.

The College will encourage young people to respect others with regard to the protected characteristics set out in the Equality Act 2010.

Young people will be taught about radicalisation and extremism as a part of the ASPIRE programme and informed of how to report any extremist content they may see online.

The PREVENT work undertaken at the College will be closely aligned with the existing Safeguarding procedures.

The College already has robust procedures, both internally and externally, for sharing information about vulnerable individuals. Any concerns about a student at risk of radicalisation should be made as a Safeguarding referral. This must be passed to the Designated Safeguarding Lead as a matter of urgency.

The Designated Safeguarding Lead will decide upon whether a referral to an external agency is appropriate. Various information sharing agreements with agencies are in place. Where appropriate and legal to do so, the College will always share information with other institutions and key partners, such as the local *Prevent Silver* group.

The Corporation ensures that safeguarding arrangements consider the procedures and practices of

the local authority as part of the multi-agency safeguarding procedures set up by the Local Safeguarding Children Board (LSCB). The College has a Safeguarding and Child Protection Policy (which includes the PREVENT duty) in accordance with government guidance and the College ensures that it abides by locally agreed multi -agency procedures put in place by the LSCB and *Prevent* coordinators across North East Lincolnshire.

The Corporation will ensure that the College's *Prevent* Strategy complies with the PREVENT duty as set out in the Counter Terrorism and Security Act 2015 and will scrutinise practice in the College, making sure that the policies and procedures in place are followed to prevent people being drawn into terrorism and extremism.

The Safeguarding Link Governor is fully aware of the PREVENT Strategy and holds the Designated Safeguarding Lead to account in this.

The Corporation receives training related to the PREVENT duty and the College's Strategy, and regular updates are provided to the board.

Governors must exemplify in their conduct the British values of democracy, the rule of law, individual liberty and mutual respect and tolerance for those with different faiths and beliefs.

Governors will ensure that they and the College actively engage with other sectors and partners to comply with and carry out the PREVENT duty.

PREVENT risk assessment and outside speakers

The College takes seriously its responsibility to exclude those promoting extremist views that support or are conducive to terrorism. Outside speakers who are deemed to have extremist views will not be invited into the College.

The College has a robust system for assessing and rating risks associated with any planned events and visiting speakers, providing evidence to suggest whether an event should proceed, be cancelled or whether mitigating action is required (for example a member of staff alerting the further education *Prevent* coordinators to concerns in relation to a guest speaker).

All events and speakers are assessed and approved by the College Leadership Team (CLT).

CLT may ask to see the content of speaker's materials prior to the event, including an outline of the topics to be discussed and sight of any presentations, footage to be broadcast, etc.

All visiting speakers will be supervised by a member of the College's staff, who is expected to interject or stop an event if they feel that the speaker is promoting extremist views or inequality in any form. This is also in line with the College's Freedom of Speech and Expression Policy to prevent people from being drawn into terrorism and extremism, including non-violent extremism (point 12(d) in the Freedom of Speech and Expression Policy).

Staff are required to book events using FIS (Visitors) with sufficient notice to allow the College Leadership Team to **undertake** checks and for cancellation to take place if necessary.

Cyber Safety

The College uses filtering to restrict access to harmful content. The College filtering system is Sophos Web Filter. This ensures that websites promoting extremist views and encouraging the radicalisation of young people are automatically blocked. In addition to this, the Tech Team and the Learning Centre Manager continuously monitor activity and use a protective service called Janet Network Resolver to prevent access to malicious websites.

The College has policies relating to the use of IT on the premises. IT policies and procedures contain specific reference to the *Prevent* duty. As some young people and staff may be using IT during their learning, and this may involve research relating to terrorism and counterterrorism, the College has clear policies in place to identify and address instances where online materials are accessed for curriculum purposes.

Prayer Facilities

The College has a Multi Faith Room. There are clear procedures set out to ensure the room is used respectfully and safely, and students are free to use it as and when required.

Additional Links and Useful Information

Counter Terrorism Bill

http://www.legislation.gov.uk/ukdsi/2014/9780111123737/contents

Government Counter Terrorism Strategy

https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/716907/140618_CCS207_CCS0218929798-1_CONTEST_3.0_WEB.pdf

2011 Government *Prevent* Strategy (page 71 for HE & FE)

https://www.gov.uk/government/uploads/system/uploads/attachment_data/file/97976/prevent-strategy-review.pdf

National Channel Guidance

https://www.gov.uk/government/uploads/system/uploads/attachment_data/file/118194/chan nel-guidance.pdf

Working Together to Safeguard Children July 2018

https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_dat a/file/729914/Working_Together_to_Safeguard_Children-2018.pdf

FAST (Families against Stress and Trauma), a community organisation that supports vulnerable families and individuals, has launched the 'Families Matter' campaign. www.familiesmatter.org.uk.

North East Lincolnshire Terrorism and Prevent

https://www.nelincs.gov.uk/keeping-our-area-clean-and-safe/terrorism-and-prevent/

PREVENT VULNERABILITY/ POSSIBLE RISK	SUMMARY OF ACTIONS TAKEN TO DATE/ALREADY IN PLACE TO MITIGATE RISK	NEW ACTION(S)/FURTHER DEVELOPMENTS	LEAD	Deadli ne	PROGRESS
Teaching, Learning, Assessment & Supporting Students	ASPIRE is delivered to each cohort of students within the academic year. These are reviewed annually by the Progress Coach Team and updated to reflect key developments in practice and intelligence.	To write and deliver specific Prevent ASPIRE lessons for the following cohorts: • ATL • Level 2 • Level 3	DSL /PPM	09/24	ASPIRE has been delivered. A speaker has been arranged to come into College in October to host sessions with all
Is the Prevent agenda and British Values embedded into the College curriculum? Are students aware of the Prevent	Prevent ASPIRE sessions are delivered to adult students as part of their life in Modern Britain.		PPM		A Prevent session is due to be delivered to adult students in October 2024.
Duty? Are students aware	An online Prevent quiz is completed by new and existing students on Kahoot to check knowledge and understanding.	To include at least 1, Prevent presentation.	/PC		Pastoral survey will be completed in Jan 2025.
of how to keep themselves safe from radicalisation? Are students aware of how to keep themselves safe	British Values are delivered as part of ASPIRE. A programme of external speakers is in place to increase students understanding around the risks and	To set up the training with the Community Safety Partnership To complete the focus groups which include questions on Prevent.	PPM/PC	06/25	The delivery of the Pastoral survey will take place w/c 6 th January. Results will be analysed at the Safeguarding Meeting in April 2025.
online?	signs of radicalisation.	To ask a Prevent related question to test knowledge	SG Team		A Prevent related question will be

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Is there sufficient pastoral care and support for all	Cyber safety and topics around keeping yourself safe are delivered as part of ASPIRE.	in the Induction and Student Services Surveys.	DSL	10/24	included in the Pastoral survey . Results will be analysed once the survey closes in Feb
students, according to the needs of the College?	Students are asked about reporting extremist content and focus groups are carried out with students on an annual basis.			02/25	2025.
	There is a Safeguarding Team in place at the College to support staff and students with a range of safeguarding issues including Prevent related matters.	To review the location of the Multi Faith Room and work with ALT to have one in The Hub. To request the	DSL/PPD Manager DDSLs	02/25	Location and equipment reviewed and monitoring.
	The College has appointed a wider Safeguarding Team to support students alongside the Progress Coach Team.	safeguarding transition files for 2023/2024.	DSL	03/25	The safeguarding transition process is still not completed as awaiting partner schools to share information.
Is the College aware of any students that may be at risk of radicalisation or radicalising others?	A Multi Faith Room is available and is overseen by the PPD Manager/ EDI Champions who have been appointed to support students where appropriate.				

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	The Safeguarding Team is available for students to support with Prevent related matters.		/		
	The College employs a team of 10 Progress Coaches to support students at the college. All staff are 'Prevent' trained in Prevent Awareness Training in accordance with the DfE Prevent updates.				
	The FIS Safeguarding register database is used to log and monitor all referrals. Sophos monitoring is in place to highlight any concerns with staff and student online activity. Transition files are requested and received from schools during the autumn term. These highlight any students of concern and share key information. The College has developed close working relationships with NELC Community Safety Partnership and because of this key information is				

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	shared by NELC, Humberside Police and the College to ensure students are safe.			/	
Referral Process & Monitoring Is there an effective referral process in place to support students	All staff are aware of the FIS safeguarding referral process and use this to report any concerns to the Safeguarding Team. This is carried out as part of new staff induction and information is included within the safeguarding newsletters.	To ensure that all new members of staff are trained to use the safeguarding referral form as part of new staff induction programme.	DSL/HR Manager DSL/DDSL	10/24	Referral training has been completed via the new Staff Induction September 2024 and all staff as a reminder.
who are at risk of radicalisation and are staff and students aware of these processes?	Safeguarding register is monitored daily by the Safeguarding Team and appropriate action taken following referrals.	To carry out additional training for pastoral and key Student Services staff.	DSL	10/24	The Safeguarding Policy has been updated and Corporation are asked to approve in September 2024.
		To update the College Safeguarding Policy and ensure that the section on	DSL/DDSL	09/24	Prevent training completed Sept 2024 as part of the annual
Is the statutory Prevent duty reflected in the appropriate	The College Safeguarding Policy and the Prevent Duty are updated annually.	Prevent is current and in line with KCSIE 2024 and the Prevent statutory duty. Key staff to attend the	DSL	09/24	safeguarding refresher training.
policies and procedures?	Prevent is a standard agenda item on every monthly Safeguarding meeting	changes to Prevent training sessions and MAP Board meetings .	DSL/CLT/Re ception	12/24	

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	and concerns around Prevent are discussed with DSL's at these meetings.	Reception and Premises staff to be trained.	/	12/24	
	The Visitors System and risk assessment have been updated to reflect the statutory Prevent duty.	,			
	The External Speakers Visitor's Procedure has been updated to reflect the statutory Prevent duty.				
	The College has implemented an online approval process for staff wishing to invite speakers into the College. Approval must be sought prior to a visitor coming onsite.				
Training Safeguarding Team Have the Safeguarding Team received appropriate	Prevent training has been delivered to all members of the Safeguarding team. Prevent updates are included in regular safeguarding briefings.	Appropriate staff to attend the termly DFE Prevent meetings and disseminate information to key members of staff.	DSL/DDSL	06/25	The Interim Deputy Principal and Safeguarding Team attend LA Prevent meetings and ensure that key information is disseminated to
Prevent training? Progress Coaches Have all PCs	Members of the Safeguarding Team attend the Department for Education and NELC Prevent Conferences & Workshops.	Deliver Prevent refresher training to all PCs. Deliver Prevent training to		10/24	relevant staff including the Safeguarding Team and the CLT.
received		Adult Learning staff.	DSL/DDSL/ PPM	11/24	Prevent training is being delivered to all Progress

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appropriate Prevent training?	Personal Progress Coaches have received Prevent training as part of the new year training programme.	Prevent training to be delivered as part of the New Staff Induction.		06/25	Coaches in September 2024. Prevent training being
Staff Have all members of staff received appropriate	Sophos delivery as part of cyber safety	Prevent training to be completed by all staff who	HR/DDSL	06/25	delivered to Adult Staff October 2024 Prevent training delivered to all new staff.
Prevent training?	training session for all Progress coaches.	require a refresher.		07/25	Further sessions to be held following any further recruitment.
Governors Are all members of	All new staff receive Prevent training	DSL to provide members of the Corporation with Prevent update training as			Any necessary Prevent updates are included in
the Governing body aware of their Prevent statutory	as part of the Induction programme.	part of the annual safeguarding training. To provide governors with	DSL/DDSL	07/25	the Safeguarding report and QTLA reports – latest report QTLA April
duty? Are all members of the Corporation	All new staff complete the online Prevent training package and there is a refresher process in place for existing staff.	a termly Prevent update as part of the safeguarding reporting mechanisms.			2025 dated March 2025. First termly meeting will take place with Link
aware of the Prevent Risks at the	existing staff.	To meet on a half termly basis with the Safeguarding	DSL		Governor October 2024.
College?	Prevent updates are included in the termly safeguarding briefings at Corporation meetings.	Link Governor to discuss any prevent concerns and progress made against the		07/25	Sessions to be arranged for next CDP day.
	Corporation meetings.	action plan.	DSL		
		Community Safety Manager from NELC to		12/25	

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	The Prevent duty forms part of the Safeguarding reports delivered to members of the Corporation.	deliver prevent session to all staff including CLT.			
	All governors complete the online Prevent training.	,	DSL		
			DSL/ DDSL		
Access & Use of	There is a Premises Team in place to	Lockdown testing to be	DSL/	09/24	Lockdown procedure
College Premises Are there	ensure that only students and visitors can access the site.	completed.	Premises	00/24	has been updated and
processes in place	can access the site.	Safeguarding arrangements for use of Premises for	Manager	09/24	testing has taken place for staff.
to ensure that	All students, staff and visitors to wear	non-College activities to be			ioi staii.
students are safe	lanyards.	included - lettings			Students' awareness of
on the College		agreement.			the lockdown alarm
premises?	Access control doors are in place				through ASPIRE
	around the College to ensure students				September 2024 and
	and staff are safe and can only access				January 2025. Refresher

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Are there effective arrangements in place to manage access to the site by visitors and non-learners/staff? Does the College have a critical incident management plan which is capable of dealing with terrorist-related issues?	areas where they have authority to do so. An electronic Visitors system is in place to log all visitors and contractors. A coloured lanyard system is in place to denote different levels of access and supervision for visitors and volunteers. A lockdown process has been agreed and is in place. Staff lockdown practice. Students aware of sound though ASPIRE. A lockdown briefing and practice has been delivered to all staff. Staff have had the opportunity to practice using the door locking system and blinds where appropriate.				to take place in Summer term 2025.
Access & Monitoring of IT & Systems Does the College employ filtering/firewall systems to prevent	Sophos content monitoring is in place to monitor electronic communications and highlight key words and searches.	To write a policy which sets out how the College will meet the Digital and Technology Standards.	DSL/Tech Team Manager/ HR Manager	10/24 10/24 09/24	A Cyber Safety Procedure has been created and to be approved by CLT and Corporation in November 2024.

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staff/students/ visitors from accessing extremist websites and material? Does the College have policies relating to the use of IT? If so, do they contain a specific reference to the Prevent Duty/misuse of IT equipment?	A Cyber Safety Policy is to be created and regularly reviewed as part of the policy review cycle. An Acceptable Use of IT Policy in place with reference to misuse of IT is referenced. Working towards Cyber Essentials accreditation.	To set up half termly monitoring meetings. To brief the staff on their responsibilities relating to the standards. To brief the governors on their responsibilities relating to the standards. To set up the logs of incidents. To review the Sophos filtering system.	DSL/Tech Team Manager	10/24 09/24 11/24	6 half-termly meetings arranged with the first being October 2024. All staff briefed via a staff training session in August 2024. Link Governor to be briefed and informed of their responsibilities in October ink Governor meeting. DSL/DDSLs and Tech Services tasked to set up a record of logs so they can be reviewed half termly. Decision made to stay with Sophos as this compliments current system in place and meets the KCSIE 2024 criteria. Review to take
	/				place in 25/26.