PREVENT Policy

1.0 Legislative Framework and Rationale

Section 21 of the Counter-Terrorism and Security Act 2015 (the Act) places a duty on certain bodies, listed in Schedule 6 to the Act, 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 the government's Prevent Duty Guidance for England and Wales when carrying out the duty.

The College's *Prevent* work is intended to deal with all kinds of terrorist threats to the UK. 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 local Prevent co-ordinators, the police and local authorities, and co-ordination through multi-agency forums.

Critically, the College views *Prevent* as an additional aspect of its already well-established Safeguarding Policies and Procedures.

2.0 Staff training

- The College recognises the need to provide appropriate training for staff involved in the implementation of this duty.
- College staff undertook face to face Prevent training delivered by the South-East HE Regional Prevent Co-ordinator in November 2021 and will complete this training again in Autumn 2023.
- The Assistant Principal and the wider safeguarding team regularly undertake additional training to understand the Government rationale for *Prevent* and the channels for further action and referral.
- The College works with external partners to ensure that appropriate training programmes are delivered to staff and INSET has been led by the Prevent Regional HE/FE Co-ordinator for SE England.
- 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 to make a Prevent referral.
- All staff should know how and where to get additional advice and support.

3.0 Information Sharing

Woking College understands that the *Prevent* programme must not involve any covert activity against people or communities. However, we recognise that we 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 will 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 e.g with the police.

When considering sharing personal information, the College will 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.

- **GDPR:** in engaging with non-public bodies, Woking College should ensure that they are aware of their own responsibilities under GDPR.

Where a member of staff has any concerns about a student, as a matter of urgency they should refer the matter to **Helena Clarke** (**Designated Safeguarding Lead) or, in her absence, Sophie Mngoma (Associate Director Pastoral) or another member of the Safeguarding Team (DDSL).** 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 their delegated alternative.

4.0 *Prevent* Compliance

- The College fully recognises its role in helping prevent people being drawn into terrorism, which includes not just violent extremism but also non-violent extremism, which can create an atmosphere conducive to terrorism and can popularise views which 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.
- The *Prevent* Strategy is to be implemented in a proportionate and risk-based way ensuring that opportunities in the 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 pastoral and curriculum schemes of learning.
- The College encourages young people to respect others with particular regard to the protected characteristics set out in the Equality Act 2010.
- Young people are taught about radicalisation and extremism as a part of the pastoral curriculum with students in Year 12 completing a comprehensive online education programme on Prevent, radicalisation and online safety.

The *Prevent* work undertaken at the College is 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 on CPOMS - the standard Safeguarding referral process. These will be reviewed by the Designated Safeguarding Lead as a matter of urgency.
- As part of wider safeguarding responsibilities college staff will be alert to:
  - Disclosures by students of their exposure to the extremist actions, views or materials of others outside college, such as in their homes or community groups, especially where students have not actively sought these out.
  - Graffiti symbols, writing or art work promoting extremist messages or images
  - Students accessing extremist material online, including through social networking sites
  - Parent/carer reports of changes in behaviour, friendship or actions and requests for assistance
  - Partner colleges, local authority services, and police reports of issues affecting students in other settings
  - Students voicing opinions drawn from extremist ideologies and narratives
  - Use of extremist or 'hate' terms to exclude others or incite violence
  - Intolerance of difference, whether secular or religious or, in line with our equalities policy, views based on, but not exclusive to, gender, disability, homophobia, race, colour or culture • Attempts to impose extremist views or practices on others
  - Anti-Western or Anti-British views.

- 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 FE prevent co-ordinators.
- The Corporation ensures that safeguarding arrangements take into account the procedures and practice of the local authority as part of the inter-agency safeguarding procedures set up by the Surrey Safeguarding Children's Partnership (SSCP). The College has a Safeguarding and Child Protection Policy in accordance with government guidance and the College ensures that it abides by

locally agreed inter-agency procedures put in place by the SSCP and the regional FE prevent co-ordinators.

- Referrals will be made via the Prevent Referral Form and emailed to preventreferrals@surrey.pnn.police.uk
- The Safeguarding Link Trustee is fully aware of the *Prevent Policy* and holds the Designated Safeguarding Lead to account in this duty.
- The Trustees receive training related to the *Prevent* Policy, and regular updates are provided to the board.

5.0 *Prevent* risk assessment

The College has a robust Prevent risk Assessment and Action plan updated annually in consultation with the Prevent Regional HE/FE Co-ordinator for SE England.

6.0 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* co-ordinators to concerns in relation to a guest speaker).
- All events and speakers are assessed and approved by the Curriculum Operations Group (COG).
- The Curriculum Operations Group (COG) 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 Colleges staff, who are expected to **interject or stop an event if the feel that the speaker is promoting extremist views or inequality in any form.**
- Outside speakers who are deemed to have extremist views will not be invited into the College.
- Staff are required to book events with sufficient notice to allow COG to undertake checks and for cancellation to take place if necessary.

6.0 IT Safety Online

- The College has policies relating to the use of IT on the 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. The College subscribes to 'Smoothwall' online filtering and monitoring. This ensures that websites promoting extremist views and encouraging the radicalisation of young people are automatically blocked. In addition to this, the IT network team and the LRC Support for Learning Administrator continuously monitor activity on the network utilising the surveillance software 'AB Tutor'.

As some young people and staff may be using IT in the course of their learning, and this may involve research relating to terrorism and counter-terrorism, the College has clear policies in place to identify and address instances where online materials are accessed for curriculum purposes.

7.0 Prayer and Faith Facilities

The College has a prayer room and there are clear and widely available guidelines on the use of faith-related facilities. The prayer room is in a central College space and has frosted clear glass windows so activity is monitored and any concerns raised with the DSL.

Additional Links and Useful Information

Counter Terrorism Bill

http://www.legislation.gov.uk/uksi/2014/3189/contents/made

Universities UK Guidance

https://www.universitiesuk.ac.uk/policy-and-analysis/reports/Pages/external-speakers-in-highereducation-institutions.aspx External speakers in higher education institutions (2013)

https://www.universitiesuk.ac.uk/policy-and-analysis/reports/Pages/freedom-of-speech-oncampus.aspx

Freedom of Speech on Campus: rights and responsibilities in UK universities (2011)

www.safecampuscommunities.ac.uk

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

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

Extremism Task Force Final Report (page 6 for HE & FE)

https://www.gov.uk/government/uploads/system/uploads/attachment_data/file/263181/ETF_FINAL.pdf

National Channel Guidance (2020)

Channel Duty Guidance: Protecting people vulnerable to being drawn into terrorism (publishing.service.gov.uk)

Were changes made to the Policy when received? If YES complete the Partial Equality Analysis table.

Questions for all Policies Is it likely that the Policy Revision could have a negative impact:-	Please Tick Box	
	YES	NO
1. On minority ethnic groups?		X
2. Due to gender?		X
3. Due to disability?		X
4. Due to sexual orientation?		X
5. Due to their religious beliefs (or none)?		X
6. On people due to them being transgender or transsexual?		X
Additional questions for Policies relating to Staff Is it likely that the Policy Revision could have a negative impact:-		
7. On people due to their age?		X
8. On people due to their marital or civil partnership status?		X
9. On people with dependants/caring responsibilities?		X

Date of Review   June 2023

Did you make changes?

X	

If YES please speak with The Assistant Principal as a full Equality Analysis may be required