

## Prevent Policy 2024 – 2025

### Including

Prevent Duty Risk Assessment and Action Plan

### Contents

Item	Description
1	CTG Ethos and Practice
2	Principles of the policy
3	Vulnerability/risk indicators
4	Why a young person may be drawn towards Extremist Ideologies
5	Recognising extremism
6	Staff Training
7	Raising Concerns
8	Role of the CTG Board of Directors
Appendix 1	Prevent Duty Risk Assessment and Action Plan

**Note:** All schools and colleges are subject to a duty under section 26 of the Counterterrorism and security Act 2015 in the exercise of their functions to have “due regard to the need to prevent people from being drawn into terrorism”. This duty is known as the Prevent duty.

### **Central Training Group (CTG) Ethos and Practice**

When operating this policy, CTG uses the following accepted Governmental definitions:

#### **Extremism**

‘Vocal or active opposition to fundamental British values, including democracy, the rule of law, individual liberty and mutual respect and tolerance for those with different faiths and beliefs. We also include in our definition of extremism calls for the death of members of our armed forces, whether in this country or overseas’.

**We live in a democratic country where the principles of tolerance and mutual respect for people of all faiths and beliefs are upheld by the rule of law. Those who hold extremist views and advocate violence go against these fundamental principles.**

#### **Radicalisation**

‘The process by which people come to support terrorism and extremism and, in some cases, to then participate in terrorist activity.’

**There is no obvious profile of a person likely to become involved in extremism, or a single indicator of when a person might move to adopt violence in support of extremist ideas. The process of radicalisation is different for every individual and can take place over an extended period or within a very short timeframe.**

#### **Terrorism**

‘An action that endangers or causes serious violence to a person/people; causes serious damage to property; or seriously interferes or disrupts an electronic system. The use or threat **must** be designed to influence the government or to intimidate the public and is made for the purpose of advancing a political, religious, or ideological cause’.

The Prevent duty is part of all schools’ and colleges’ wider safeguarding obligations. Designated safeguarding leads and other senior leaders should familiarise themselves with the revised Prevent duty guidance: for England and Wales, especially paragraphs 57-76, which are specifically concerned with schools (and covers childcare). The guidance is set out in terms of four general themes: risk assessment, working in partnership, staff training, and IT policies. There is additional guidance: Prevent duty guidance: for further education institutions in England and Wales that applies to specifically to colleges.

All extremists aim to develop destructive relationships between different communities by promoting division, fear and mistrust of others based on ignorance or prejudice and thereby limiting the life chances of young people. Education is a powerful weapon against this; equipping young people with the knowledge, skills, and critical thinking, to challenge and debate in an informed way.

CTG does not tolerate extremist views of any kind whether from internal sources; learners, staff or non-executive governors, or external sources; college community, external agencies, or

individuals. Learners see CTG as a safe place, free from harm or risk of harm and where necessary we will action referrals or processes to ensure CTG remains a safe place for all.

As a training provider, we recognise that extremism and exposure to extremist materials and influences can lead to poor outcomes for learners and so should be addressed as a safeguarding concern as set out in this policy. We also recognise that if we fail to challenge extremist views, we are failing to protect our learners.

Therefore, at CTG we provide a broad and balanced curriculum, delivered by skilled professionals, so that our learners understand and become tolerant of difference and diversity. We will ensure that they feel valued and not marginalized. By delivering a broad and balanced curriculum, augmented by the use of external sources where appropriate, we will strive to ensure our learners recognise risk and build resilience to manage any such risk themselves where appropriate to their age and ability but also to help them develop the critical thinking skills needed to engage in informed debate.

CTG will closely follow any locally agreed procedure as set out by the Local Authorities and/or Safeguarding Children's Board's agreed processes and criteria for safeguarding individuals vulnerable to extremism and radicalisation. We will actively engage with the police, and regional DfE Further Education Prevent Co-coordinators.

CTG reserve the right to initiate our own internal policies considering a safeguarding concern that may put the learner, other learners, or staff at risk of harm.

CTG will help support learners who may be vulnerable to such influences as part of our wider safeguarding responsibilities and where we believe a learner is being directly affected by extremist materials or influences. We will ensure that we follow procedure as directed by local authority, prevent coordinator, police, social care, and any other agency necessary to safeguard and support that learner and others.

By delivering a broad and balanced tutorial programme, augmented using external sources where appropriate, we will strive to ensure our learners recognise risk and build resilience to manage any such risk themselves where appropriate to their age and ability but also to help them develop the critical thinking skills needed to engage in informed debate.

### **Principles of the policy**

**Safeguarding.** CTG does not tolerate extremist views of any kind whether from internal sources; learners, or staff or external sources such as local community, external agencies or individuals.

CTG is a safe place, free from harm or risk of harm and where necessary we will action referrals or processes to ensure that CTG remains a safe place for all. As a training provider, we recognise that extremism and exposure to extremist materials and influences can lead to poor outcomes for learners and so should be addressed as a safeguarding concern as set out in this policy.

We recognise that if we fail to challenge extremist views, we are failing to protect our learners. Therefore, at CTG we will provide a broad and balanced learning programme, delivered by skilled professionals, so that our learners understand and become tolerant of difference and diversity.

Any prejudice, discrimination, or extremist views, including derogatory language, displayed by learners or staff will always be challenged and where appropriate dealt with in accordance with our disciplinary procedures. As part of wider safeguarding responsibilities, CTG staff will be alert to:

- The importance of promoting British Values through the curriculum,
- Disclosures by learners, of their exposure to the extremist actions, views, or materials of others outside, such as in their homes or community groups, especially where learners have not actively sought these out.
- Graffiti symbols, writing or artwork promoting extremist messages or images.
- Learners accessing extremist material online, including through social networking sites.
- Parental reports of changes in behaviour, friendship or actions and requests for assistance.
- local authority services, and police reports of issues affecting learners in other colleges or settings.
- Learners 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

### **Vulnerability/risk indicators**

There is no single profile of a person who may be vulnerable to being drawn into terrorism. The following indicators have been provided to support staff in understanding and recognising factors that may make a young person more susceptible to being radicalised and/or drawn into extremism.

- **Identity Crisis** – Distance from cultural/religious heritage and uncomfortable with their place in the society around them.
- **Personal Crisis** – Family tensions; chaotic home-life; sense of isolation; adolescence; low self-esteem; disassociating from existing friendship group and becoming involved with a new and different group of friends; searching for answers to questions about identity, faith and belonging.
- **Personal Circumstances** – Migration; local community tensions; events affecting country or region of origin; alienation from British Values; having a sense of grievance that is triggered by personal experience of racism or discrimination or aspects of Government policy.
- **Unmet Aspirations** – Perceptions of injustice; feeling of failure; rejection of civic life.
- **Criminality** – Experiences of imprisonment; poor resettlement/reintegration; previous involvement with criminal groups.

### **Why a young person may be drawn towards Extremist Ideologies:**

- They may be searching for answers to questions about identity, faith and belonging.
- They may feel their culture or religion is under threat.
- They may desire adventure and excitement.
- They may be driven by a need to raise their self-esteem and raise their street credibility.
- They may be driven towards a group who can offer identity and support.
- They may have a personal grievance or experience of racism or discrimination resulting in a need to make a difference.
- They may be influenced by the media.
- They may be under pressure from peers who have links to extremist groups.
- They may be vulnerable due to a learning difficulty or disability.

### **Recognising extremism - Signs may include:**

- Out of character changes in dress, behaviour, and peer relationships.

- Secretive behaviour – online and regarding peers.
- Losing interest in previous friends and activities.
- Showing sympathy for extremist causes.
- Glorifying violence.
- Advocating messages like extremist individuals/organisations, such as: Britain First, English Defence League, Muslims against Crusades, Islamic State of Iraq and AL Sham (ISIS).
- Showing a mistrust of mainstream media reports and belief in conspiracy theories.
- Demonstrating an intolerance/hatred of different faiths, cultures and/or sexual orientations.

Far Right Symbolic Tattoos: **18=AH**= Adolf Hitler, **88=HH**= Heil Hitler



### More critical signs could include:

- Being in contact with extremist recruiters.
- Articulating support for extremist causes or leaders to others: This is often scripted.
- Accessing extremist websites, especially those with a social networking element.
- Possessing extremist literature – including literature regarding weaponry/bombs.
- Using extremist narratives and a global ideology to explain personal disadvantage.
- Justifying the use of violence to solve societal issues.
- Joining extremist organisations.
- Use of racist language.
- Attending or taking part in violent 'protests' /riots.
- Significant changes to appearance and/or behaviour.
- Fascination with / possession of knives, weaponry, bombs, toxic substances.

### Important questions to consider.

#### Social Factors

- Does the young person have experience of poverty, disadvantage, discrimination or social exclusion?
- Does the young person display a lack of affinity or understanding for others, or social isolation from peer groups?
- Does the young person have any learning difficulties or mental health support needs?
- Does the young person demonstrate a simplistic or flawed understanding of religion or politics?
- Does the young person have a history of crime, including episodes in prison?
- Is the young person a foreign national, refugee or awaiting a decision on their immigration/national status?
- Does the young person have insecure, conflicted or absent family relationships?
- Has the young person experienced any trauma in their lives, particularly any trauma associated with war or sectarian conflict?
- Is there evidence that a significant adult or other in the young person's life has extremist views or sympathies?

#### Travel

- Is there a pattern of regular or extended travel within the UK, with other evidence to suggest this is for purposes of extremist training or activity?
- Has the young person travelled for extended periods of time to international locations known to be associated with extremism?

- Has the young person employed any methods to disguise their identity?

**Education** learners will encounter a variety of learning programmes and tutorials that explore the safeguarding issues and enable learners to become educated against the threats and harm of extremism and the threats of being drawn into terrorism.

**Accountability.** The CTG Designated Safeguarding Lead will maintain a risk register and will monitor the institutional risk of CTG members being drawn into terrorism. (See Annex A)

**Celebrating diversity.** The culturally diverse nature of CTG must be actively celebrated and promoted to counter the threat of radicalisation from external influences.

**Information sharing.** Some internal and external information sharing will be necessary but only under appropriately controlled conditions. This does not amount to an agreement to share personal data on anything other than a need based and case by case basis.

**Social media.** Social media is a vehicle by which vulnerable individuals are particularly susceptible to radicalisation. As a training provider social media and internet usage from our own devices is monitored and a strict firewall is in place. An alert system operates for any web site or key words used that may cause potential risk or harm to a learner.

### **IT / Website Usage**

Regular and stringent checks will be made on firewalls, to ensure that access to illegal and inappropriate sites is prevented. IT usage will be closely monitored in real time by the IT team (Brunel), to identify and address inappropriate use. In addition, guest logins will be tracked to eliminate risk of anonymised inappropriate access. Daily reports of attempts to access inappropriate websites will be provided to the Designated Safeguarding Lead.

### **Guest Speakers**

We will pay particular attention to guest speakers and events and ensure that materials and resources do not encourage or promote radicalisation or extremism. A register of guest speakers will be maintained by CTG and vetting of both speakers and their materials will be carried out before approval is granted.

### **Staff Training**

All staff will undergo annual 'PREVENT' online training with a particular focus on the susceptibilities and influencing factors which lead a young person to have extremist views. They will understand their duties with regards to raising concerns and how young people can be further supported.

### **Raising Concerns**

Where there are concerns of terrorism, extremism or radicalisation, learners and staff will report them to the Designated Safeguarding Lead/ Deputy Designated safeguarding lead or Managing Director. The procedure for reporting and referring safeguarding concerns will apply unless the threat is immediate and life threatening in which case the police will be contacted. All information regarding concerns will be fed immediately through the police, social care, prevent and any other agency that CTG deem appropriate to contact. At this stage, the learner will be asked to remain at home and not access a CTG site until CTG seek further clarification from all agencies involved.

CTG will inform the DFE prevent coordinator immediately and seek support from the coordinator regarding managing risk.

CTG will engage actively with the police and the Channel process working with the counter terrorism police to ensure that CTG remains a safe place.

Depending on feedback and intelligence from all agencies involved CTG may instigate the three stages or the disciplinary policy. CTG reserve the right to instigate these policies based on information CTG deem appropriate. This will be communicated to all parties and if stage three of the disciplinary procedures is actioned this will also be put in writing. CTG will endeavour to keep in regular contact with the learner during this process. A meeting will be called as part of the policy procedure however we will take guidance from the police/Prevent in planning the date of this meeting as the outcome of their investigations will be vital in the preparation of this meeting. If an internal policy is actioned due to a safeguarding, health & well-being or safety concern the learner will be asked to remain at home and not access CTG site until the meeting date.

CTG operates a lock down (Run, tell, hide) procedure in the event of a safeguarding incident and all staff and learners are made aware of this procedure at the beginning of an academic year, with practice testing each term.

### **Role of the CTG Board of Directors**

The CTG Board of Directors and Senior Management Team (SMT) will undertake appropriate training to ensure that they are clear about their role and the parameters of their responsibilities as Directors, including their statutory safeguarding duties. The Board of Directors will support the ethos and values of CTG and will support CTG in tackling extremism and radicalisation.

### **Related Documents:**

Safeguarding Policy

Equality and Diversity Policy

E Safety Policy



## Appendix 1: Prevent Duty Risk Assessment and Action Plan

No.	Prevent Vulnerability/Risk Area	Risk Y/N	Action taken/already in place to mitigate/address risk	Owner	When	RAG
1	<p><b>Leadership</b></p> <p>Do the following people have a good understanding of their own and institutional responsibilities in relation to the "Prevent Duty"?</p> <ul style="list-style-type: none"> <li><input type="checkbox"/> Board of Directors</li> <li><input type="checkbox"/> Senior Management Team (SMT)</li> <li><input type="checkbox"/> Teaching Team</li> <li><input type="checkbox"/> Support and Mentoring Staff</li> <li><input type="checkbox"/> Safeguarding team</li> </ul>	Y	<p>All staff receive annual training in the Prevent Duty and Channel procedures.</p> <p>Further training is implemented following any changes in procedures or legislation.</p>	Board	On-going	Green
2	<p><b>Partnership</b></p> <p>1) Is there active engagement from the institution's Board of Directors, SMT and Department Managers?</p> <p>2) Does the institution have an identified single point of contact (SPOC) in relation to Prevent?</p> <p>3) Does the institution engage with the BIS Regional Prevent Coordinator, Local Authority Police Prevent Leads and engage with local Prevent Boards/Steering Groups at Strategic and Operational level?</p>	Y Y N	<p>1) The Managing Director is the Vice Chairmen of the LEP and engages with BIS, SFA and EFA on Prevent Duty</p> <p>2) The Single Point of Contact (SPOC) for Prevent and Safeguarding generally is the Designated Safeguarding Lead, Director of Learner Progress &amp; Compliance</p> <p>3) The SPOC is familiar with both Local Authority and Police Prevent Leads.</p> <p><b>Action:</b> SPOC to contact each BIS Regional Prevent Coordinator where CTG have a centre.</p>	Board SI SI SI	On-going On-going On-going Dec 24	Green Green Amber Red



3	<p><b><u>Staff Training</u></b></p> <p>Do all staff have sufficient knowledge and confidence to:</p> <ol style="list-style-type: none"> <li>1) Exemplify British Values in their management, teaching and through general behaviours in the institution.</li> <li>2) Understand the factors that make people vulnerable to being drawn into terrorism and to challenge extremist ideas which are used by terrorist groups and can purport to legitimise terrorism.</li> <li>3) Have sufficient training to be able to recognise this vulnerability and be aware of what action to take in response.</li> </ol>	Y	Teaching teams back up the delivery of British Values via Learner Resource packs and through general discussions	SMT	On-going	Green
4	<p><b><u>Welfare and Pastoral Support</u></b></p> <ol style="list-style-type: none"> <li>1) Are there adequate arrangements and resources in place to provide pastoral care and support as required by the institution?</li> <li>2) Are there adequate monitoring arrangements to ensure that this support is effective and supports the institutions welfare and equality policies?</li> </ol>	Y	The teaching team provide support to both learners and employers with links to local support agencies.	SI	On-going	Green
5	<p><b><u>Speakers and Events</u></b></p>	N		SMT/	On-going	Green

	<p>1) Is there an effective policy/framework for managing speaker requests?</p> <p>2) Is it well communicated to staff/students and complied with?</p> <p>3) Is there a policy/framework for managing on campus events i.e., charity events?</p> <p>4) Are off campus events which are supported, endorsed, funded or organised through the institution subject to policy/framework?</p>	<p>N</p> <p>N</p> <p>N</p> <p>N</p>	<p>All visiting speakers are vetted by the Centre Manager/Board of Directors as part of the arrangement process.</p> <p><b>Action:</b> Ensure Safeguarding and Prevent Policies have up to date information on visitors</p> <p><b>Action:</b> Policy to be available to staff</p> <p><b>Action:</b> updated procedures to include management of events (Prevent Policy)</p> <p><b>Action:</b> Updated policy (Prevent) to include events that are supported, endorsed, funded or organised through Central</p>	<p>Board</p> <p>SL</p> <p>SL</p> <p>SL</p> <p>SL</p>	<p>Sept 24</p> <p>Sept 24</p> <p>Sept 24</p> <p>Sept 24</p>	<p>Green</p> <p>Green</p> <p>Green</p> <p>Green</p>
6	<p><b>Safety Online</b></p> <p>1) Does the institution have a policy relating to the use of IT and does it contain a specific reference and inclusion of the Prevent Duty?</p> <p>2) Does the institution employ filtering/firewall systems to prevent staff/students/visitors from accessing extremist websites and material?</p> <p>3) Does this also include the use of using their own devices via Wi-Fi?</p>	<p>Y</p> <p>Y</p> <p>Y</p> <p>Y</p>	<p>There is a fully comprehensive Online Safety policy in place that includes information and procedures for Prevent Duty in respect of IT</p> <p>Internet filtering/firewall is in place across Central Training Group.</p> <p>The filtering system is managed by Central's IT consultants and always monitored.</p> <p>Alerts are raised to warn of any serious or repeated breaches of the policy.</p>	<p>SI</p> <p>SI</p> <p>SI/IMS</p> <p>SI/IMS</p>	<p>On-going</p> <p>On-going</p> <p>On-going</p> <p>On-going</p>	<p>Green</p> <p>Green</p> <p>Green</p> <p>Green</p>

	4) Does the system alert to serious and/or repeated breaches or attempted breaches of the policy?					
7	<b><u>Prayer and Faith Facilities</u></b> 1) Does the institution have prayer facilities?  2) Are there procedures in place in respect of activities and space in these facilities?	N  Y	There is no specific prayer facility, however, private space is made available for prayer at request.  Requests to use the prayer space is via the Mentoring Team	SI  Mentors/Tutors	On-going  On-going	Green  Green
8	<b><u>Centre Security</u></b>  1) Are there effective arrangements in place to manage access to the campus by visitors and non-students/staff?  2) Are dangerous substances kept and stored on site?  3) Is there a policy in place to manage the storage, transport, handling, and audit of such substances?  4) Is there a policy covering the distribution (including electronic) of leaflets or other publicising material?  5) Does the institution intervene where off centre activities are identified or are likely to impact upon staff and/or students i.e., leafleting, protest etc.?	Y  Y  N  Y  Y	Buzz door entry is in place at all sites. Visitors are required to sign in and issued with Visitors badges at each site reception.  Cleaning and Hairdressing products are safely stored at Central training centres.  Staff and Students follow COSHH regulations within the Health & Safety Policy.  There is a Marketing Policy in place that covers distribution of publicising materials.  The SPOC/Safeguarding Officer Emails Alerts to relevant centres/managers and sub-contractors/partners with information on activities likely to impact upon staff or students.	SMT  SMT / Tutors  SMT/ Tutors  SI  SI	On-going  On-going  On-going  On-going  On-going	Green  Green  Green  Green  Green

9	<b><u>Safeguarding</u></b>					
	1) Is protection against the risk of radicalisation and extremism included within Safeguarding and other relevant policies?	Y	There is a comprehensive Safeguarding and Prevent Policy in place	SI	On-going	Green
	2) Do Safeguarding and welfare staff receive additional and ongoing training to enable the effective understanding and handling of referrals relating to radicalisation and extremism?	Y	All Safeguarding and mentoring staff are qualified and receive ongoing training to ensure they are competent in referrals relating to radicalisation and extremism.	SI	On-going	Green
	3) Does the institution utilise Channel as a support mechanism in cases of radicalisation and extremism?	Y	Channel is utilised as a support mechanism across the company.	SI	On-going	Green
4) Does the institution have a policy regarding referral to Channel identifying a recognised pathway and threshold for referral?	Y	Channel is referred to within the Central Policy as the recognised pathway for referral	SI	On-going	Green	
10	<b><u>Communications</u></b>					
	1) Is the institution Prevent Lead and their role widely known across the institution?	Y	Staff and learners are informed at induction about the Prevent lead and their role	SI/HR	On-going	Green
	2) Are staff and students made aware of the Prevent Duty, current risks and appropriate activities in this area?	Y	Staff and students are made aware of the Prevent Duty at induction and then on-going throughout their stay with Central.	SI/HR	On-going	Green
3) Are there information sharing protocols in place to facilitate information sharing with Prevent partners?	N	Learner Privacy notice is shared with learners at induction informing that Prevent data will be shared with relevant authorities/agencies.	SI	On-going	Green	
11	<b><u>Incident Management</u></b>	N	<b>Action:</b> Critical incident management plan relating to a terrorist incident to be drafted	SI	Sept 24	<b>Red</b>

	<p>1) Does the institution have a critical incident management plan which is capable of dealing terrorist related issues?</p> <p>2) Is a suitably trained and informed person identified to lead on the response to such an incident?</p> <p>3) Are effective arrangements in place to ensure that staff and students are appraised of tensions and provide advice where appropriate?</p>	<p>Y</p> <p>N</p>	<p>The SPOC will lead the response to any such incident.</p> <p>The SPOC/Safeguarding Officer Emails Alerts to relevant centres/managers and sub-contractors/partners with information on activities likely to impact upon staff or students.</p> <p><b>Action:</b> Arrangements to be agreed and implemented to ensure that staff and learners are appraised of tensions and advice provided</p>	<p>SI</p> <p>SI</p> <p>Board</p>	<p>In place</p> <p>On-going</p> <p>Sept 24</p>	<p>Amber</p> <p>Green</p> <p>Amber</p>
12	<p><b><u>Partner Companies</u></b></p> <p>1) Does awareness training extend to sub-contractor or Partner organisations?</p> <p>2) Is the institution vigilant to the radicalisation of learners at sub-contractor or partner organisations?</p>	<p>Y</p> <p>Y</p>	<p>Sub-contractor staff receive the same level of training as those working directly at Central.</p> <p>Monthly Sub-contractor meetings take place and teaching observations are completed to cover all areas of Safeguarding</p>	<p>SI</p> <p>SI</p>	<p>On-going</p> <p>On-going</p>	<p>Green</p> <p>Green</p>
13	<p><b><u>Freedom of Expression</u></b></p> <p>1) Does the institution have a Freedom of Speech/Expression policy?</p> <p>2) Does this policy recognise and incorporate the risks associated with radicalisation and extremism?</p> <p>3) Is the need to protect vulnerable individuals covered within this policy?</p>	<p>N</p>	<p>Staff and learners are encouraged to voice ideas and opinions, and reference is made in the Equality and Diversity and Prevent Policies</p> <p>Learner focus groups take place where learners are encouraged to voice opinions and grievances in line with mutual respect and British Values</p> <p>Covered within this policy (above</p>	<p>Tutors</p> <p>SI</p> <p>SI</p>	<p>On-going</p> <p>On-going</p> <p>On-going</p>	<p>Amber</p> <p>Green</p> <p>Green</p>

--	--	--	--	--	--	--