

Prevent Policy 2025 - 2026

Including Prevent Duty Risk Assessment and Action Plan

1. Purpose

Central Training Group (CTG) is committed to safeguarding and promoting the welfare of all learners, apprentices, staff, visitors and stakeholders. CTG recognises its statutory duties under Section 26 of the Counter-Terrorism and Security Act 2015 and will have due regard to the need to prevent people from being drawn into terrorism.

This policy sets out CTG's responsibilities under the Prevent Duty and outlines the procedures that staff, learners and stakeholders must follow where concerns relating to radicalisation, extremism, terrorism or online harm are identified.

The Prevent Duty forms part of CTG's wider safeguarding responsibilities and should be read alongside the following policies:

- Safeguarding and Child Protection Policy
- Online Safety and Acceptable Use Policy
- Equality, Diversity and Inclusion Policy
- Staff Code of Conduct
- Disciplinary Policy
- Whistleblowing Policy
- Health and Safety Policy

CTG will actively promote:

- British Values
- Equality of opportunity
- Respect for diversity
- Freedom of speech within the law
- Learner wellbeing and resilience
- Safe use of technology and digital platforms

CTG has a zero-tolerance approach to extremist behaviour, hate speech, discrimination, harassment, intimidation or the promotion of terrorism.

2. Scope

This policy applies to:

- All CTG staff
- Learners and apprentices
- Governors and Directors
- Contractors and agency staff
- Visitors and guest speakers
- Subcontractors and partner organisations
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The policy applies across:

- All CTG sites
 - Remote learning environments
 - Online and digital activity
 - Employer premises where learners are undertaking training
 - Off-site activities, trips and enrichment events
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3. Legal and Statutory Framework

This policy has been developed with reference to:

- Counter-Terrorism and Security Act 2015
- Prevent Duty Guidance for England and Wales (2023, updated 2024)
- Prevent Duty Guidance for Further Education Institutions in England and Wales
- Keeping Children Safe in Education (KCSIE) 2025
- Working Together to Safeguard Children
- Equality Act 2010
- Data Protection Act 2018 and UK GDPR
- Online Safety Act 2023
- Further Education and Skills Inspection Toolkit (Ofsted)

CTG recognises that safeguarding vulnerable individuals from radicalisation is no different from safeguarding them from other forms of harm.

4. Definitions

Extremism

Extremism is defined by HM 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.”

This also includes calls for the death of members of the armed forces.

Radicalisation

Radicalisation refers to the process by which a person comes to support terrorism and extremist ideologies associated with terrorist groups.

Terrorism

Terrorism is defined in the Terrorism Act 2000 as action designed to influence the government or intimidate the public for the purpose of advancing a political, religious or ideological cause.

Online Harm

Online harm includes exposure to extremist content, grooming, disinformation, hate material, violent or harmful ideologies, exploitation through social media platforms, gaming platforms, encrypted messaging applications and other digital environments.

5. Roles and Responsibilities

Board of Directors

The Board of Directors will:

- Ensure CTG complies with the Prevent Duty
- Monitor safeguarding and Prevent arrangements
- Ensure adequate resources are available
- Receive regular Prevent and safeguarding updates
- Ensure staff training is effective and current
- Promote a safeguarding culture across the organisation

Designated Safeguarding Lead (DSL)

The DSL is the Single Point of Contact (SPOC) for Prevent.

The DSL will:

- Lead on Prevent implementation
- Maintain the Prevent risk assessment and action plan
- Coordinate referrals to external agencies including Channel
- Liaise with police, local authority Prevent teams and DfE Prevent Coordinators
- Ensure staff training is completed and monitored
- Maintain accurate safeguarding records
- Provide support and guidance to staff
- Monitor emerging local and national risks

Staff Responsibilities

All staff must:

- Complete mandatory safeguarding and Prevent training annually
- Promote British Values through teaching and learner interactions
- Remain vigilant to signs of radicalisation or extremism
- Report concerns immediately to the DSL or Deputy DSL
- Maintain professional curiosity
- Challenge discriminatory, extremist or hateful language and behaviour appropriately
- Follow safeguarding reporting procedures at all times
- Support learners in developing resilience and critical thinking skills

Failure to report concerns may be treated as a disciplinary matter.

Learners

Learners are expected to:

- Treat others with respect and tolerance
- Follow acceptable use and online safety expectations
- Report concerns about themselves or others
- Engage positively with British Values and safeguarding education
- Avoid accessing or sharing harmful, extremist or illegal material

Employers and Workplace Mentors

Employers and workplace mentors are expected to:

- Promote a safe, respectful and inclusive working environment
- Reinforce British Values and professional standards of conduct
- Report any concerns relating to radicalisation, extremist behaviour, hate incidents, online harm or safeguarding risks immediately to the CTG Designated Safeguarding Lead (DSL)
- Cooperate fully with safeguarding investigations, referrals and risk management processes
- Ensure learners are not exposed to extremist material, discriminatory behaviour or unlawful conduct within the workplace
- Maintain appropriate safeguarding and Prevent awareness relevant to their role
- Escalate concerns where learner behaviour, comments, online activity or workplace interactions indicate possible vulnerability to radicalisation

Subcontractors

Subcontractors are expected to demonstrate effective Prevent arrangements including:

- A current Prevent policy and risk assessment
- Staff Prevent training records
- Evidence of learner awareness activities
- Appropriate safeguarding reporting procedures
- Compliance with safer recruitment expectations
- Effective online safety and IT monitoring arrangements

CTG reserves the right to audit subcontractor Prevent arrangements, request evidence of compliance, require improvement actions and suspend delivery where safeguarding or Prevent risks are identified.

6. Risk Assessment and Local Context

CTG will maintain a live Prevent risk assessment that considers:

- Local and regional threats
- National trends and emerging risks
- Risks associated with online radicalisation
- Risks affecting vulnerable learners
- External speakers and events
- Partnership and subcontractor arrangements
- IT filtering and monitoring systems
- Staff confidence and training needs

The risk assessment will be reviewed at least annually and following any significant incident.

7. Indicators of Vulnerability

There is no single indicator that an individual may be vulnerable to radicalisation. Staff should exercise professional judgement and consider the wider context.

Possible indicators may include:

- Sudden changes in behaviour, appearance or friendship groups
- Increased isolation or withdrawal
- Expression of extremist or hateful views
- Use of racist, misogynistic, anti-Semitic, homophobic or discriminatory language
- Fixation on conspiracy theories or grievances
- Accessing extremist content online
- Glorification of violence or terrorism
- Repeated viewing or sharing of harmful online content
- Possession of extremist literature or symbols
- Intolerance towards different cultures, religions or lifestyles
- Obsession with violence, weapons or mass casualty incidents
- Participation in harmful online communities
- Significant changes in emotional wellbeing

Additional vulnerabilities may include:

- Mental health difficulties
- Social isolation
- Trauma or adverse childhood experiences
- Experience of discrimination
- Criminal exploitation
- Learning difficulties or disabilities
- Family conflict or instability

8. Online Safety and Digital Safeguarding

CTG recognises that online platforms are a significant route through which individuals may be exposed to radicalisation, extremist narratives and harmful ideologies.

CTG will:

- Maintain effective filtering and monitoring systems
- Monitor inappropriate searches and online activity
- Ensure acceptable use agreements are in place
- Educate learners about online safety risks
- Promote safe and responsible use of digital technology
- Respond promptly to online safeguarding concerns
- Work in accordance with the Online Safety Act 2023
- Address emerging online harms including misogyny, incel ideology, violent extremism and harmful influencers

Staff Responsibilities Regarding Online Safety

Staff must:

- Remain alert to online indicators of harm or radicalisation
- Report concerning online activity immediately to the DSL
- Never investigate extremist material independently
- Preserve evidence where appropriate
- Follow safeguarding and IT reporting procedures
- Promote respectful online behaviour
- Reinforce critical thinking and media literacy

Learner Education

Learners will receive education and support relating to:

- Online grooming and exploitation
- Extremist propaganda
- Misinformation and disinformation
- Safe use of social media
- Cyberbullying and hate speech
- Reporting concerns online
- Digital resilience and critical thinking

9. Managing Concerns and Referrals

Any member of staff who has concerns that a learner may be vulnerable to radicalisation, extremism or terrorism must:

- Remain calm and avoid confrontation
- Record concerns factually and accurately
- Report concerns immediately to the DSL or Deputy DSL
- Preserve any relevant evidence
- Avoid promising confidentiality
- Continue to support the learner appropriately

Where there is an immediate risk of harm or threat to life, staff must contact emergency services by dialling 999 and inform the DSL immediately.

The DSL will:

- Assess the concern
- Seek advice from Prevent professionals where appropriate
- Make referrals to Channel or other safeguarding agencies if required
- Maintain confidential safeguarding records
- Inform relevant senior leaders where necessary
- Ensure proportionate and supportive intervention

CTG recognises that Prevent referrals are safeguarding referrals and should be managed in line with safeguarding principles.

10. Channel Process

Channel is a voluntary, confidential, multi-agency safeguarding programme which supports individuals who may be vulnerable to being drawn into terrorism.

CTG may refer concerns to Channel where appropriate.

Participation in Channel is not a criminal sanction and aims to provide support at an early stage.

11. Curriculum and Learner Development

CTG will provide a broad and balanced curriculum which:

- Promotes British Values
- Encourages critical thinking and debate
- Develops resilience to extremist narratives
- Promotes equality, diversity and inclusion
- Encourages respectful discussion
- Supports emotional wellbeing
- Raises awareness of online safety and harmful content

Prevent themes may be delivered through:

- Tutorials
 - Enrichment activities
 - Citizenship education
 - Safeguarding sessions
 - Guest speakers
 - Apprenticeship reviews
 - Online safety campaigns
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12. Visiting Speakers and External Events

CTG will ensure that visiting speakers and external events:

- Are appropriately risk assessed
- Do not promote extremist views or unlawful activity
- Support CTG values and safeguarding responsibilities
- Are supervised where appropriate

All visiting speakers must be approved by senior management.

Any concerns regarding external speakers or events must be reported to the DSL.

13. Partnership Working

CTG will work collaboratively with:

- Local Authorities
 - Prevent Teams
 - Counter Terrorism Police
 - Channel Panels
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- DfE Regional Prevent Coordinators
- Employers and subcontractors
- Safeguarding partnerships
- Social care and support services

Information sharing will take place lawfully, proportionately and in line with safeguarding and data protection requirements.

14. Staff Training

CTG will ensure:

- All staff complete safeguarding and Prevent training annually
- DSLs receive enhanced Prevent training
- New staff receive Prevent training as part of induction
- Staff are updated on emerging risks and local threats
- Staff understand referral processes and reporting expectations
- Governors and Directors receive appropriate Prevent training

Training records will be monitored and maintained.

15. Monitoring and Quality Assurance

CTG will monitor the effectiveness of this policy through:

- Annual policy review
 - Prevent risk assessment reviews
 - Safeguarding audits
 - Learner feedback
 - Staff training compliance
 - Monitoring of safeguarding referrals
 - IT monitoring reports
 - Quality improvement processes
 - Subcontractor compliance audits including sampling of Prevent records, review of staff training records, sampling of staff safeguarding checks and audits of learner awareness activities.
 - Governance oversight
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16. Equality, Diversity and Freedom of Expression

CTG is committed to promoting equality, diversity and inclusion.

Central Training Group recognises the importance of lawful freedom of speech, academic discussion and open debate as fundamental parts of education, personal development and democratic society.

Learners, staff and stakeholders are encouraged to express views, discuss challenging issues and engage in respectful debate, provided this is done within the law and in a manner that does not promote violence, hatred, discrimination, intimidation or extremist ideology.

CTG recognises that holding controversial, political, cultural or religious views does not in itself constitute extremism. The organisation will not suppress lawful discussion or legitimate freedom of expression. However, CTG will actively challenge behaviour, language or activity that seeks to radicalise others, promote terrorism, encourage hatred, undermine the rights and freedoms of others or create an unsafe environment.

Any concerns relating to extremist behaviour, unlawful speech, online radicalisation or risks to learner safety will be managed proportionately through safeguarding and Prevent procedures.

17. Confidentiality and Information Sharing

Information relating to Prevent concerns will be:

- Recorded securely
- Shared only on a need-to-know basis
- Managed in line with safeguarding responsibilities
- Processed in accordance with UK GDPR and data protection legislation

CTG recognises that effective safeguarding may require appropriate information sharing with external agencies.

18. Related Policies and Guidance

This policy should be read in conjunction with:

- Safeguarding Policy
 - Online Safety Policy
 - Equality, Diversity and Inclusion Policy
 - Learner Behaviour Policy
 - Staff Code of Conduct
 - Health and Safety Policy
 - Data Protection Policy
 - Whistleblowing Policy
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19. External Sources

[The Prevent duty: safeguarding learners vulnerable to radicalisation - GOV.UK](#)

[Understanding and identifying radicalisation risk in your education setting - GOV.UK](#)

[Managing risk of radicalisation in your education setting - GOV.UK](#)

[Prevent duty guidance - GOV.UK](#)

Appendix 1 – Prevent Duty Risk Assessment and Action Plan

Risk Area	Existing Controls	Further Actions	Lead	Review Frequency
Leadership and Governance	Prevent lead identified and trained	Annual governance review	DSL / Board	Annual
Staff Training	Mandatory annual training in place	Introduce scenario-based refresher sessions	HR / DSL	Annual
Online Safety	Filtering and monitoring systems active	Increase learner awareness of online harms and extremist influencers	DSL / IT	Termly
External Speakers	Vetting procedures in place	Centralise speaker approval records	Board	Annual
Learner Support	Tutorials and mentoring available	Strengthen referral pathways	DSL	Ongoing
Partnerships	Links with Prevent and safeguarding partners	Improve intelligence sharing processes	DSL	Ongoing
IT and Device Usage	Monitoring and acceptable use procedures in place	Review filtering reports monthly	IT / DSL	Monthly
Subcontractors	Safeguarding expectations communicated	Annual compliance audit including policy review & staff training records	HR / DSL	Annual
Incident Response	Emergency procedures in place	Review lockdown and critical incident plans	Board	Annual
Communication	Learners informed during induction	Develop additional learner awareness campaigns	Marketing / DSL	Termly

Policy Owner: Designated Safeguarding Lead (DSL)

Approved By: Board of Directors

Review Cycle: Annual or sooner in response to legislative change

Policy Review Date: May 2026

Next Review Due: May 2027