



**PREVENT POLICY 2021-23**

Version	1
Effective Date	September 2021
Review Date	October 2023
Owner	Executive Director for Curriculum & Quality

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## 1. Introduction

1.1 The Government definition of extremism is:

*'The vocal or active opposition to fundamental British Values, including democracy, the rule of law, individual liberty and mutual respect of different faiths and beliefs. It also includes any calls for death of members of the armed forces.'*

1.2 All extremist groups with violent tendencies are classified as terrorists. All terrorist groups show tendencies to recruit people to their cause. This is known as 'radicalisation'.

1.3 The Government's Prevent Agenda is one of the four elements of CONTEST, the Government's counter terrorism strategy.

1.4 The four elements are:

- **PURSUE**: to stop terrorist attacks
- **PREVENT**: to stop people becoming terrorists or supporting terrorism
- **PROTECT**: to strengthen the country's protection against a terrorist attack
- **PREPARE**: to mitigate the impact of a terrorist attack

1.5 The UK faces a range of potential terrorist threats, including religious extremism, far right extremism, animal rights extremism and some aspects of non-violent extremism.

1.6 The current threat level from terrorism remains at 'Substantial'. Up to date threat levels can be obtained from the following website:

<https://www.mi5.gov.uk/threat-levels>

1.7 Section 21 of the Counter Terrorism and Security Act 2015 (the Act) places a duty on certain bodies, listed in Schedule 3 of the Act, to have "due regard to the need to prevent people from being drawn into terrorism". The Act states that those authorities on Schedule 3, including Further Education institutions, must have regard to this guidance when carrying out their duties.

The adequacy and effectiveness of this 'due regard to the need to prevent...' is measured by Ofsted.

1.8 Government Prevent Strategy

The Prevent strategy seeks to:

- Respond to the ideological challenge of terrorism and aspects of extremism, and the threat we face from those who promote these views
- Provide practical help to prevent people from being drawn into terrorism and ensure they are given appropriate advice and support
- Work with a wide range of sectors where there are risks of radicalisation, which need to be addressed, including education, criminal justice, faith, charities, the internet and health.

## **2. Scope and Aim of the Policy**

- 2.1 MidKent College recognises that some students and staff may be at risk from radicalisation. MidKent College will assess the risks of violent extremism, which represents the greatest threat at national level, while recognising that other forms of violence and extremism can and do manifest themselves within other nearby schools, colleges and/or training providers.
- 2.3 On this basis, the College has developed with its students, staff, governors and visitors a strong culture of respect and a safe place of learning. It is in this context that the College has considered its Prevent Duty and recognises the importance of working with staff, governors, the local authority, the police, the local safeguarding board, health professionals, local Prevent experts and others to identify and to safeguard vulnerable students and staff in the College.
- 2.4 It is our duty to continue to safeguard our students and staff; empowering them to protect themselves from harm. The Prevent duty is therefore an integral part of the College's Safeguarding Policy and procedures.
- 2.5 The College's Prevent strategy outlines how we will meet our statutory duty.

Our strategy has five key objectives:

- To promote and reinforce our core values of inclusiveness, integrity, involvement and, in so doing, promote fundamental British values;
- To promote community cohesion; support open dialogue; support the student and staff voice and eliminate discrimination;
- To safeguard our students and staff from the risk of radicalisation and empower students and staff to protect themselves from harm;
- To support those at risk;
- To ensure that staff and students are aware of their responsibilities in preventing violent extremism.

- 2.6 In line with changes to the National Curriculum that require the inclusion of Prevent, the College will ensure that tutorial provision reflects and reinforces the Prevent agenda.

### **3. PROCEDURES**

- 3.1 In order to achieve these objectives the strategy will concentrate on four areas:

#### 3.2 Leadership and Values

To provide an ethos which upholds core values of shared responsibility and wellbeing for all students, staff and visitors and promotes respect, equality, diversity inclusion and understanding. This will be achieved through:

- Promoting core values of respect, equality, diversity, inclusion, democratic society, student voice and participation
- Building staff and student understanding of the issues and confidence to deal with them
- Deepening engagement with local communities
- Actively working with local schools, local authorities, police and other agencies, apprentice student employers and employers supporting learning activity within the college and supporting industry placements.

#### 3.3 Teaching and Learning

To provide a curriculum which promotes knowledge, skills and understanding to build the resilience of students, by undermining extremist ideology and supporting the learner voice.

This will be achieved through:

- Embedding equality, diversity and inclusion, wellbeing and community cohesion
- Promoting wider skill development such as social and emotional aspects of learning
- A curriculum adapted to recognise local needs, challenge extremist narratives and promote universal rights
- Teaching and learning strategies which explore controversial issues in a way which promotes critical analysis and pro social values
- Use of external programmes or groups to support learning while ensuring that the input supports college goals and values.
- Encouraging active citizenship and learner voice

### 3.4 Student Support

To ensure that staff are confident to take preventative and responsive steps working with partner professionals, families and communities. This will be achieved through:

- Establishing strong and effective student support services
- Listening to what is happening in the College and the community
- Implementing anti-bullying strategies and challenging discriminatory behaviour
- Helping students and staff know how to access support in College and or through community partners
- Supporting problem solving and repair of harm
- Supporting at risk students through safeguarding and crime prevention processes
- Systematically reviewing its performance to ensure it narrows the attainment gap with vulnerable or disadvantaged groups/communities.
- Developing through training and support a number of staff who will have the knowledge, skills and confidence to lead debates about controversial issues through tutorial and forums
- Continually reviewing and adapting the tutorial programme to further raise awareness of different faiths and cultures alongside developing the critical thinking skills required to make informed decisions.

### 3.5 Managing Risks and Responding to Events

To ensure that the College monitors risks and is ready to deal appropriately with issues which arise. It will do this through:

- Understanding the nature of the threat from violent extremism and how this may impact directly or indirectly on the College
- Understanding and managing potential risks within the College and from external influences
- Responding appropriately to events in local, national or international news that may impact on students and communities
- Ensuring measures are in place to minimise the potential for acts of violent extremist within the College
- Ensuring plans are in place to respond appropriately to a threat or incident within the College and relating policies
- Developing effective ICT security and responsible user policies

3.7 If staff have a concern about a student vulnerable to radicalisation, they are to immediately refer the matter to a member of the Safeguarding team.

- 3.8 If staff have a concern about a colleague vulnerable to radicalisation, they are to immediately refer the matter to the Director of HR and Payroll.
- 3.9 If students have a concern about a fellow student or anyone else, they are to immediately refer their concerns to their course leader, subject teachers, member of the Safeguarding team, any member of the Progression and Performance Tutor team or use the 'report a concern' icon on any College computer.
- 3.10 Once a staff member is informed, the staff member needs to follow the previous point i.e. refer the matter to a member of the Safeguarding team or Director of HR and Payroll, as appropriate.

### **3.11 Reporting Prevent Referrals**

- 3.12 All Prevent referrals are to be reviewed by the Student Support Manager and if the referral concerns a member of staff, the Director of HR and Payroll.
- 3.13 In deciding what action is appropriate, there will be a discussion with the Kent Police Prevent Team. This discussion may lead to a formal referral through Kent Police who have a CHANNEL procedure in place.
- 3.14 The Police CHANNEL procedure is a partnership focused structure with the aim to support individuals and to protect them from harm, not only from radicalisation but also from involvement in drugs, knife or gun crime.

### **3.15 Recording Prevent Referrals**

- 3.16 All Prevent referrals, actions and outcomes will be kept securely within the Safeguarding office at the Medway Campus, even if deemed 'a false alarm'.
- 3.17 The Principal and Executive Director of Curriculum and Quality will be notified of these referrals, even if it is deemed 'a false alarm'.

## **4. Duties and Responsibilities**

- 4.1 To ensure that the College Prevent Strategy is implemented at the heart of all College activities; that leaders and managers monitor any emerging risks related to Prevent and other safeguarding issues; and that staff are ready to deal appropriately with radicalisation issues, the Lead Designated Safeguarding Officer (Assistant Principal, Student Support and Foundation Education) or Director of HR and Payroll (staff related) will ensure:

- There is sufficient pastoral care, learning support and welfare support for all students, especially for young people from ethnically diverse and socially and economically disadvantaged areas – Students
- There is sufficient duty of care for staff, especially for those from ethnically diverse and socially and economically disadvantaged areas – Staff
- All staff organising events and activities (off and on site, use of faith room, external speakers and College visitors) are proactively looking for any possibility or likelihood for students or staff to have contact with or become involved in terrorism – Events and Activities
- Key staff and managers work in partnership with others (staff, governors, the local authority, the local safeguarding board, the police, health professionals, Prevent professionals etc.) to ensure student and staff safety – Partnership
- There is effective IT security (including the use of Wi-Fi/BOYD) in place to filter and protect students and staff from inappropriate use of the internet and social media or the possibility of being exposed to radicalisation content on websites – Security
- Staff (curriculum, support and facilities) are trained in understanding the causes of radicalisation, their duty in the prevention of radicalisation and how to report potential radicalisation incidents to maintain student and staff safety – Training
- The policy is promoted to employers of apprentice students including how to identify and report concerns.

4.2 The above will be monitored through an Action Plan (Appendix A).

4.3 The MidKent College Referral Pathway is attached (Appendix B).

## **5. Associated MKC Policies, Strategies and Procedures**

- Child Protection (Safeguarding) Policy
- Equality and Diversity Policy
- Anti-bullying and Harassment Policy
- E-Safety Policy
- Access, Security and Visitors to the College
- Visiting Speakers Policy
- Admission and Enrolment
- Student Charter
- Employment Policies and Procedures
- Health and Safety
- Security
- Emergency Evacuation
- Student Disciplinary Policy

## **6. Policy Validity**

- 6.1 This policy is valid for the academic year 2021-23 and is due for review October 2023.

## **7. Policy Owner and Reviewer**

- 7.1 The Senior Manager responsible for this policy is the Executive Director, Curriculum & Quality.
- 7.2 The current writer responsible for this policy is the Director of Support for Students.

## **8. Policy Monitoring, Review and Evaluation**

- 8.1 A review of this policy and Action Plan will be undertaken by the review date by the policy writer and will be approved by the Person responsible.

## **9. Equality Impact Assessment**

- 9.1 This Policy has been Equality Impact assessed and generates no concerns about differential impact. The Equality Impact Assessment is filed on the Quality SharePoint site.

## APPENDIX A

### Prevent Action Plan

<b>FE Name</b>	MidKent College
<b>Prevent Contact</b>	Direct of Support for Students Student Support and Welfare Manager
<b>Date last updated</b>	06/11/20
<b>Date actions to be reviewed</b>	01/02/21
<b>Next review due</b>	

No.	Potential Prevent Vulnerability	Action Required / Evidence if in place	Who	When	RAG
1	<b>Awareness</b> Do staff have an understanding of the Prevent Duty and the Prevent Agenda?	Online Home Office WRAP training is now mandatory for all staff to complete. PREVENT is included in College Welcome for all staff. Focus Day CPD Mandatory for all staff	All Staff	Ongoing	Green
	Board of Governors	Board of Governors initial training on 20/02/20. Follow up training delivered by Director of Student Support	Corine Burkin	Ongoing	Green
	Security Staff	Update that all security staff have now completed the NCALT.	Jacqueline Newman	Ongoing	Green

2	<b>Safeguarding</b> Do safeguarding, and student support service leads recognize Prevent vulnerabilities and what to do if they suspect that	Close links are kept with Local Prevent Police Team and Local Authority. The Director of Support for Students sits on Kent and	Ashley Ritchie	Ongoing	Green
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	someone is being being drawn into terrorism?	Medway Prevent Strategy Boards. Student Support Team Leader attends local ARM meetings for Kent and Medway	Ashley Ritchie	Ongoing	Green
	Do safeguarding policies incorporate Prevent vulnerabilities?	Safeguarding policies incorporate Prevent.	Ashley Ritchie	Ongoing	Green
	Are safeguarding leads aware of Channel?	Key staff trained in WRAP and the CHANNEL process Director of Support for Students is a member of both Medway and Kent Prevent Duty Delivery Boards.	Ashley Ritchie	Ongoing	Green

3	<b>IT Systems</b>				
	Are filtering/firewall systems in place to prevent individuals from accessing extremist websites?	Yes: Content Filtering. Anti-Virus Anti-Malware Email Spam/Virus/Content Filtering User Account Security Firewalls and VPN access	ICT Paul Hogben	Ongoing	Green
	Are they tested regularly and are the filtering systems up to date?	Our internet provider (JA.NET) carry out penetration testing on a monthly basis and provide a report highlighting any risk areas.	ICT Paul Hogben	Ongoing	Green
	Do they alert relevant staff if someone tries to access extremist sites?	ICT systems and infrastructure team receive an email alert if attempts are made to access extremist sites. PC gets a report where suspicious searches have been highlighted.	ICT Paul Hogben	Ongoing	Green
		ICT staff alert Paul Hogben Director of ICT			

	Do staff know what to do if someone accesses the above?	who reviews the alert and advises Student Support Manager	ICT	Ongoing	
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4	<p><b>Campus Security</b> Are students/staff challenged if they are not wearing ID?</p> <p>How are authorised visitors managed?</p> <p>How do they identify/stop unauthorised visitors? How do you restrict access to the campus i.e. swipe, code entry?</p>	<p>Yes</p> <p>Lanyard colors/escorted visitors</p> <p>Visitors Procedure Swipe card to access areas, can be restricted if needed</p>	<p>Uniform Security/Duty Managers and Staff</p> <p>Uniform Security/Duty Managers and Staff</p> <p>Uniform Security/Duty Managers and Staff</p>	<p>Ongoing</p> <p>Ongoing</p> <p>Ongoing</p>	<p>Green</p> <p>Green</p> <p>Green</p>
5	<p><b>Literature / charitable giving / events / visiting speakers</b></p> <p>Are policies / procedures in place for charitable giving?</p> <p>Is there a procedure for checking visiting speakers / events?</p> <p>Does permission have to be granted for people to distribute leaflets?</p> <p>Do staff know what extremist literature looks like? And who to report this to if it is found on campus?</p> <p>What process are in place if individuals / groups are handing out extremist material outside the institution?</p>	<p>Only known legitimate charities supported through charities commission.</p> <p>Yes - Procedure completed by Workflow</p> <p>Yes on college premises and grounds</p> <p>All staff are aware to report any prevent related issues to Safeguarding. EL covered in training</p> <p>College security to be alerted and local police attendance requested</p>	<p>College Financial Regulations</p> <p>Authorised by Ashley Ritchie</p> <p>SLT Approval</p> <p>All staff</p> <p>Security</p>	<p>Ongoing</p> <p>Complete</p> <p>Ongoing</p> <p>Ongoing</p> <p>Ongoing</p>	<p>Green</p> <p>Green</p> <p>Green</p> <p>Green</p> <p>Green</p>

7	<p><b>Holding challenging conversations</b>  Are staff confident and competent to facilitate discussions related to radicalisation and extremism?</p> <p>Are there opportunities available to do this i.e. through tutorials / Diversity campaigns?</p> <p>Are students given the skills to challenge extremist narratives?</p>	<p>Staff training provided to raise awareness and give confidence to have these conversations e.g. WRAP training</p> <p>One to one tutorials, on track week, Personal Development Tutors.</p> <p>Students are delivered lessons on Prevent and British Values. Message given that it is appropriate to challenge, and details who to talk to in college.</p>	<p>Ashley Ritchie  Kim Carter  Ben Beer</p> <p>Progression and Performance Tutors</p> <p>Progression and Performance Tutors/All Tutors</p>	<p>Ongoing</p> <p>Ongoing</p> <p>Ongoing</p>	<p>Green</p> <p>Green</p> <p>Green</p>
8	<p><b>Policies &amp; Procedures</b>  Are the relevant policies and procedures in place?</p> <p>Safeguarding  Visiting speakers  IT security  Staff use of social media  Disciplinary  Use of prayer facilities e-safety</p>	<p>Yes  Yes  Yes  Yes  Yes  Yes  Yes</p>	<p>Ashley Ritchie  Ashley Ritchie  Paul Hogben  Steve Hyland  Ashley Ritchie  HR  Paul Hogburn</p>	<p>Ongoing  Ongoing  Ongoing  Ongoing  Ongoing  Ongoing  Ongoing</p>	<p>Green</p>

9	<b>Information Sharing / Partnership</b> Are there information sharing protocols in place with the Police and other relevant agencies?	Yes	Georgia Harvey	Ongoing	Green
	Do the Police know who to contact for any issues?	Police prevent teams have College contact details for college SPOC.	Ashley Ritchie Georgia Harvey	Ongoing	Green
	Does the college Prevent lead know who to contact at the Police?	Yes 101 direct or Prevent team email direct dial	Ashley Ritchie	Ongoing	Green

	Do other staff members know who the Prevent lead is at the college?	Details given in Focus Day training, college welcome and on PREVENT posters around the college.	All Staff	Ongoing	Green
10	<b>Local Prevent Structures</b> Is the institution connected to the Local Authority Prevent Coordinator?	Yes, Regular meetings with Local Prevent Police Officer. Director of Support for Students sits on both Local Authorities prevent delivery boards.	Ashley Ritchie	Ongoing	Green
11	<b>Tensions &amp; grievances</b> Are you aware of potential tensions and grievances within your student body?	Multi faith and culture college. Local and national tensions kept up to date with local police contacts.	Simon Cook Ashley Ritchie	Ongoing	Green
12	<b>Prevent Messaging</b> How is Prevent communicated across the institution? i.e. posters, newsletters, intranet, student and staff handbooks, staff induction, internal literature	Poster campaign throughout college. Student lessons on PREVENT and British Values. Staff Training and college welcome. Parent PREVENT handbook now on website	All Staff	Ongoing	Green
			Ashley Ritchie	Ongoing	Green

13	<p><b>Staff and volunteers</b> Are there checks in place to identify potential radicalization by members of staff?</p> <p>Is Prevent / British Values included within safer recruitment activities?</p> <p>Is there a whistle blowing policy in place?</p>	<p>Enhanced DBS checks are carried out on all staff</p> <p>Prevent is included in safer recruitment activities and is also raised at interview stage.</p> <p>Yes</p>	<p>HR</p> <p>HR</p> <p>HR</p>	<p>Completed</p> <p>Completed</p> <p>Completed</p>	<p>Green</p> <p>Green</p> <p>Green</p>
14	<p><b>Dangerous Substances</b> Is the institution aware of, and comply with all relevant legislation in the storage and handling of dangerous substances including chemicals, bacteria, viruses and toxins?</p>	<p>Yes. All COSH regulations complied with and procedures followed</p>	<p>Laura Smith Facilities</p>	<p>Ongoing</p>	<p>Green</p>
15	<p><b>Employers</b>  <b>Are employers of apprentices or providing industry placements aware of their responsibilities, understand how to</b></p>	<p>As part of apprentice enrolment and employer, induction the policy is shared and promoted. Employers are advised of all safeguarding responsibilities including where to access advice and how to report</p>	<p>Jane Burtenshaw</p>	<p>Ongoing</p>	<p>Green</p>

	<b>identify and report concerns</b>	concerns. All aspects of safeguarding are discussed during apprentices 12 week progress review.			
16	<b>Dealing with an incident</b> Does your critical management plan identify a lead person to deal with terrorist related issues?  Is there a Business Continuity Plan in place which includes acts of terrorism or an escalation of the current threat level?	How is this tested? Look at Prepare Strand. Look at " Staying Safe" firearms and weapons attack  Yes, it is incorporated in the Business Continuity Plan	HR, Martin Peat Ashley Ritchie  Martin Peat	Ongoing  Ongoing	Green  Green
17	<b>Curriculum</b> Are fundamental British values embedded throughout the curriculum?  Are there opportunities for developing pupils' resilience to radicalisation?	Yes FBV lessons are part of ongoing scheme of work and embedded into curriculum  Pupils are encouraged to discuss radicalisation during PPT Prevent sessions.	Progression and Performance Tutors/Course Tutors  PPT's are delivering PREVENT, British Values and Safeguarding tutorials.	Ongoing  Ongoing (Continuing part of PPT work)	Green  Green

## APPENDIX B

### MIDKENT COLLEGE

#### PREVENT SAFEGUARDING REFERRAL PATHWAY

**Prevent** – *To stop people supporting terrorism or becoming a terrorist. It is a multiagency approach to support individuals in a proportionate manner.*

Below is a Referral pathway flowchart that MidKent College will adopt:

