

The Prevent Strategy and Policy

Responsible Senior Manager: Vice Principal Students Learning and Quality

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Related Policies: Child Protection and Safeguarding policy
Staff Code of Conduct
Back on Track Policy

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1. Background and Government Legislation

1.1 Prevent Strategy Aims

Through the Prevent strategy the Government aims to reduce the threat to the UK from terrorism by stopping people being drawn into terrorism through non-violent extremism, which can create an atmosphere conducive to terrorism and can popularise views which terrorists exploit. This is part of an overall counter-terrorism strategy called CONTEST, which has 4 strands:

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

1.2 Prevent Focus

The Prevent strand of the strategy focuses on three key areas

- To respond to the ideological challenge of terrorism and the threat from those who promote it.
- To prevent people from being drawn into terrorism and ensure that they are given appropriate advice and support.
- To work with sectors and institutions where there are risks of radicalisation that we need to address.

1.3 Definitions – Extremism, Radicalisation and Terrorism

- 1.1. The Government has defined extremism in the Prevent strategy 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.”
- 1.2. The Government has defined radicalisation as the process by which a person comes to support terrorism and extremist ideologies associated with terrorist groups.
- 1.3. The Government has defined terrorism as actions that endangers or causes serious violence to people, serious damage to property or serious interference to electronic systems.

1.4 Requirements for Colleges

The Government Prevent Duty Guidance, updated in September 2023, requires Colleges to ensure they have risk assessment processes for speakers and ensure those espousing extremist views do not go unchallenged. The guidance also identifies institutions responsibility for appropriate IT policies, staff training and student welfare programmes to be in place to recognise and respond to the signs of radicalisation.

1.5 College Duty

The Counter-Terrorism and Security Act 2015 places a duty on Colleges to have due regard to the need to prevent people from being drawn into terrorism.

2. Legal Duties Under the Counter Terrorism and Security Act 2015

2.1 HSDC Responsibilities

HSDC (which comprises campuses at Havant, South Downs and Alton and some community venues) has a legal obligation towards the Prevent duty to fulfil the following responsibilities.

Specific Duty
<p>a. Partnership: To demonstrate effective compliance with the duty, Colleges must demonstrate engagement from governors, boards, managers and leaders, regional Prevent co-ordinators, the police and local authorities, and co-ordination through existing multi-agency forums.</p>
<p>b. Management and Co-ordination arrangements: Where the size of an institution warrants, management and co-ordination arrangements should be implemented to share information across the relevant curriculum areas within an institution, with a single point of contact for operational delivery of Prevent-related activity. This will normally be the Designated Safeguarding Lead.</p>
<p>c. Risk assessment: Each institution should carry out a risk assessment which assesses where and how students or staff may be at risk of being drawn into terrorism. The risk assessment will address the physical management of the College's estate, including policies and procedures for events held by staff, Students or visitors, and relationships with external bodies and community groups who may use premises, or work in partnership with the institution.</p> <p>There must be clear and visible policies for whistle blowing and complaints</p>
<p>d. Action Plan: Any institution that identifies a risk should notify the relevant Prevent co-ordinator and others as necessary and develop a Prevent action plan to set out the actions they will take to mitigate the risks.</p>
<p>e. Staff Training/Reporting and Referrals: The College must demonstrate that it undertakes appropriate training and development for principals, governors, leaders and staff. Staff should have an understanding of the factors that make people vulnerable to being drawn into terrorism and to challenge extremist ideas, and also to be aware of the action to take.</p>
<p>f. Information Sharing: There is an expectation on the institution to have robust procedures both internally and externally for sharing information about vulnerable individuals.</p>
<p>g. Welfare and pastoral support: Staff are expected to be trained to recognise changes in behaviour and outlook of Students through Prevent and safeguarding training. The College has a clear role to play in the welfare of their students and is expected to have sufficient pastoral care and support available for all students.</p>

h. Prayer Room/Multi-faith Room: The College is expected to have clear and widely available policies for the use of prayer rooms and other faith-related facilities. These policies should outline structures in place for managing prayer and faith facilities and mechanisms for managing any issues arising from the use of the facilities.
i. IT policies: College is expected to have policies relating to the use of IT on the premises which contain specific reference to the duty. Colleges must have clear policies in place for students and staff using IT equipment.
j. Physical estate: Staff involved in the physical security of the estate must have an understanding and awareness of the Prevent duty

Monitoring Prevent Risk Assessment: The Safeguarding Forum will monitor the College's Prevent Risk Register on a twice-yearly basis to ensure that the College is meeting its obligations.

3. Information Sharing and the Prevent Duty

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. Information sharing must be assessed on a case-by-case basis.

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 2018 and the Human Rights Act 1998.
- **Data Protection Act and the Common Law Duty of Confidentiality:** in engaging with non-public bodies, the specified authority should ensure that they are aware of their own responsibilities under the Data Protection Act.

4. Staff/Student Responsibilities and Examples of Suspicious Activity

4.1 Staff Responsibility

All staff are part of a multi-agency approach to protect students and staff at risk from radicalisation. All suspicions of activity of this kind should be immediately referred to a Designated Safeguarding Lead.

4.2 Example Indicators

Example indicators that an individual is engaged with an extremist group, cause or ideology can be emotional, physical, or verbal:

- Spending increasing time in the company of other suspected extremists.
- Changing style of dress or personal appearance to accord with the group.
- Day-to-day behaviour becoming increasingly centred around an extremist ideology, group or cause.
- Loss of interest in other friends and activities not associated with the extremist ideology, group or cause.
- Possession of material or symbols associated with an extremist cause.
- Attempts to recruit others to the group/cause/ideology.
- Communications with others that suggest identification with a group/cause/ideology.
- Clearly identifying another group as threatening what they stand for and blaming that group for all social or political ills.
- Using insulting or derogatory names or labels for another group.
- Speaking about the imminence of harm from the other group and the importance of action now.
- Expressing attitudes that justify offending on behalf of the group, cause, or ideology.
- Condoning or supporting violence or harm towards others; or
- Plotting or conspiring with others.

4.3 Training

All staff will receive training on Prevent in line with annual safeguarding training. Students will receive Prevent training as part of the tutorial programme. Apprentices will receive this training through work-based trainers.

4.4 Who are we safeguarding?

HSDC has a duty to help vulnerable people at risk of being recruited by terrorist or extremist groups at home or abroad and safeguarding individuals and the community as a whole.

There is no stereotype for people who hold extremist views. Vulnerability, isolation and personal grievances added to strong political, religious or social views, can result in a person searching for a cause. People can become vulnerable for many reasons including:

- Low esteem
- Fear
- Guilt
- Loss
- Lack of purpose
- Anger
- Isolation
- Peer pressure
- Family breakdown

There is no inference that one or all of these characteristics or circumstances will drive someone to terrorism, but they can lead to a sense of injustice – be that on a personal or more far-reaching scale. Vulnerabilities or susceptibilities can then be exploited towards crime or terrorism by people who have their own agenda.

There is no typical gender, age, religion, or background that extremists will target but they use a sense of “Duty” (belonging to a specific group), “Status” (need for reputation) and “Spiritual Rewards” (test of faith) as a way of drawing them in.

4.5 Identifying vulnerability to radicalisation

The College will adopt the ethos of “Notice, Check, Share” where there are concerns that an individual may be vulnerable.

Notice - Recognition of any changes in behaviour or appearance similar to those outlined in Section 4.2.

Check – Speak with someone you trust and see what they recommend but trust your instinct if you are still concerned.

Share – Speak to one of the Safeguarding Panel to report your concerns – do this by following the College Safeguarding Procedure. Remember, trust your instinct.

4.6 Staff and student responsibilities

If you are a student and concerned about another student, a member of staff or a visitor, please “Check” with your tutor in the first instance and “Share” with the Safeguarding Team, either visit the team and speak to a member of staff or use the email if less urgent: safeguarding@hsrc.ac.uk.

If you are a member of staff and are concerned about a student, another member of staff or a visitor, please “Check” and “Share” with the Safeguarding Team. Either visit the team and speak to a member of staff or use the email if less urgent: safeguarding@hsrc.ac.uk.

5. Management of Events and External Speakers

5.1 Values

All staff and Students have the right to study without fear of intimidation, harassment and threatening or extremist behaviour. The preservation of academic freedom is underpinned by tolerance and a respect for diversity. Intolerance involves behaviour motivated by prejudice or hatred that intentionally demeans individuals and groups defined by their ethnicity, race, religion and/or belief, sexuality, gender, disability, age or lawful working practices and which give rise to an environment in which people will experience, or could reasonably, fear harassment, intimidation or violence. The College has a duty of care to all of its students and staff.

5.2 HSDC Values and Expectations regarding Events and External Speakers

HSDC:

- values the opportunities presented by external speakers for students to experience diverse opinion and to enter into debate. This is seen as an essential part of both personal and academic development.
- values the tradition of academic freedom and holds that no subject or belief should be excluded from reasonable, constructive discussion and debate.
- values freedom of opinion and speech but recognises that, in the interests of the whole learning community, this must exist within formal guidelines.
- recognises and supports the moral and legal frameworks of the society and community within which it works.
- will not accept the use of language by external speakers that offends and is considered to be intolerant. This includes offensive "street" misogynistic, misanthropic, sexual or racist language irrespective of context. Direct attacks on any religions or beliefs are not permitted.
- will not tolerate any person who intentionally demeans individuals and groups defined by their ethnicity, race, religion and/or belief, sexuality, gender, disability, age, or lawful working practices and which give rise to an environment in which people will experience, or could reasonably, fear harassment, intimidation, or violence.

5.3 Aims

HSDC aims to ensure that any events where external speakers are invited to address students and other members of the College community:

- are lawful.
- ensure the health and safety of all members of the College community, buildings and equipment.
- are aligned to the values and aims of the College.

5.4 Operational Arrangements

All requests for an external speaker are to be submitted by the individual or College group making the request using the appropriate form (see Appendix D) to the Vice Principal (Students, Learning & Quality), at least fifteen working days before the planned event.

Failure to obtain approval may result in the event / speaker being cancelled.

The College reserves the right to require references for the proposed speaker and also to refuse permission for the speaker to visit the College.

5.5 Letting arrangement of college property

It will be at the discretion of the College whether lettings arrangements can be entered into with external faith, political or other issue-based organisations. Arrangements will not be entered into where such an organisation does not abide by the values of the College, seeks to promote an extremist agenda and /or where the event or activity is not equally accessible to all.

Checks will be made at random points on external lettings to ensure that activity is as intended.

Appendix 1- Local Threats

What actions do we take to prevent young people being impacted detrimentally by local threats?

We will:

1. Update and maintain our Prevent risk assessment, considering the impact of any local changes in risk or community tensions.
2. Make effective use of Counter-Terrorism Local Profiles and multi sector partnerships to ensure UpToDate knowledge and awareness.
3. Ensure both staff and students are clear on the local risks in the areas which we work and learn. Ensure both staff and students are aware of reporting procedures to raise concerns as stated in the Safeguarding and Child Protection Policy.
4. Explore curriculum and tutorial opportunities for critical thinking. Implement opportunities for students to enhance their awareness when appropriate opportunities arise.

Appendix 2 – Glossary of Terms

Channel - Channel is a programme which focuses on providing support at an early stage to people who are identified as being vulnerable to being drawn into terrorism. The programme uses a multi-agency approach to protect vulnerable people by:

- identifying individuals at risk
- assessing the nature and extent of that risk
- developing the most appropriate support plan for the individuals concerned

Channel Panel - The Channel process is managed by the Channel Panel chaired by the Local Authority. Its members may include, but are not limited to:

- NHS
- Social workers
- Schools, further education colleges and universities
- Youth offending services
- Directors of children's and adult's services
- Chairs of Local Safeguarding Children Boards and Safeguarding Adult Boards
- Local authority safeguarding managers (adult and/or children)
- Local authority Troubled Families Team
- Home Office Immigration (Immigration Enforcement, UK Visas & Immigration)
- Border Force
- Housing
- Prisons
- Probation.

MASH - Multi-Agency Safeguarding Hub - MASH is the first port of call for anyone with a child safeguarding concern. A MASH is a multi-agency team which co-locates key safeguarding agencies (including social care, police, health, education) with a view to better identifying risks to children and young people, and improving decision-making, interventions, and outcomes. A MASH enables the multi-agency team to appropriately review their information systems, share all appropriate information in a secure environment, and ensure that the most appropriate response is provided to effectively safeguard and protect.

Appendix 3 – Risk Assessment



Dynamic Risk Assessment

No.	Risk Area	Risk	Gross Score	Existing Controls	Residual Score	Action needed	RAG	Responsibility
1.	Leadership	Leadership do not have a good understanding of their own and institutional responsibilities in relation to Prevent.						
2.	Partnership	The College does not engage with partner organisations (including Regional prevent Co-ordinator, Police, prevent leads, local organisations)						
3	Staff Training	Staff are not sufficiently aware of Prevent, the indicators of radicalisation and what to do if they have a concern.						
4	Radicalisation	The College is not informing its students sufficiently about the risks of extremism in the local area.						
5	Welfare, pastoral and Chaplaincy support	There is not sufficient welfare and pastoral support to monitor and support students who might be at risk.						
6	Speakers and Events	The College does not have a robust policy to prevent external speakers radicalising students						

7	Safety Online	IT systems and policies at the College are not sufficiently robust and students may be radicalised online						
8	Safeguarding	Safeguarding policies and practices at the College are not sufficiently robust in protecting students from radicalisation and informing them what to do if they have a concern. This refers to all students including Work Based Learners						
9	Communications	Staff at the College are not aware of who the Safeguarding team are at the College and so may not know who to refer concerns to						
10	Subcontracting and Volunteers	The College does not take reasonable steps to ensure subcontractors and voluntary staff have sufficient regard to Prevent						
11	Site Security	Security at the site is not sufficiently robust and unwelcome visitors could be on site						
12	Incident Management	The College does not have a sufficiently robust Incident Management plan to deal with critical incidents or terrorist related issues						

Risk Scoring

Likelihood		Severity	
Almost Certain	5	Catastrophic	5
Very Likely	4	Major	4
Likely	3	Moderate	3
Unlikely	2	Minor	2
Improbable	1	None or Trivial	1

Questions to support judgements

Please pay specific regard to these questions when scoring each section of the Risk Assessment

Leadership	Do the following people, have good understanding of their own and institutional responsibilities in relation to the “Prevent Duty”? <ul style="list-style-type: none"> • Board • SMT • Staff • Safeguarding team
Partnership	<ol style="list-style-type: none"> 1) Is there active engagement from the institution’s board, SMT, managers and leaders? 2) Does the institution have an identified single point of contact (SPC) in relation to Prevent? 3) Does the institution engage with the Regional Prevent Co-ordinator, Local Authority Police Prevent Leads and engage with local prevent Boards/Steering Groups?
Staff Training	Do all staff have sufficient knowledge and confidence to: <ol style="list-style-type: none"> 1) exemplify British Values in their management, teaching and through general behaviours in the institution 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 3) have sufficient training to be able to recognise this vulnerability and be aware of what action to take in response
Welfare, pastoral and Chaplaincy support	<ol style="list-style-type: none"> 1) Are there adequate arrangements and resources in place to provide pastoral care and support as required by the institution? 2) Does the institution have chaplaincy provision or is this support signposted locally or brought in? 3) Does the chaplaincy support reflect the student, apprentice/trainee demographic and need?

	4)	Does the institution have prayer facilities?
	5)	Are there good governance and management procedures in place in respect of activities and space in these facilities?
Speakers and Events	1)	Is there an effective policy/framework for managing speaker requests?
	2)	Is it well communicated to staff and students and complied with?
	3)	Is there a policy/framework for managing on site events?
Safety Online	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?
	2)	Does the institution employ filtering/firewall systems to prevent staff/student/visitors from accessing extremist websites and material?
	3)	Does this also include the use of using their own devices via Wi-Fi?
	4)	Does the system alert to serious and/or repeated breaches or attempted breaches of the policy?
Safeguarding	1)	Is protection against the risk of radicalisation and extremism included within Safeguarding and other relevant policies?
	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?
	3)	Does the institution utilise 'Channel' as a support mechanism in cases of radicalisation and extremism?
Communications	1)	Is the institution Prevent Lead and their role widely known across the institution?
	2)	Are staff and students made aware of the Prevent Duty, current risks and appropriate activities in this area?
	3)	Are staff and students aware of the radicalisation threats arising from the COVID pandemic?
	4)	Are there information sharing protocols in place to facilitate information sharing with Prevent partners?
Subcontracting and Volunteers	1)	Do all subcontractors include an agreement to comply with the Prevent duty?
	2)	Have all staff from subcontracted organisations who come into contact with your students, apprentices or trainees undergone training?
	3)	Does awareness training extend to agency staff and volunteers?
Site Security	1)	Are there effective arrangements in place to manage access to the site by visitors and non-student, apprentice or trainees/staff?
	2)	Is there a policy regarding the wearing of ID on site? Is it enforced?
	3)	Is there a policy covering the distribution (including electronic) of leaflets or other publicising material?
	4)	Are dangerous substances kept and stored on site?
	5)	Is there a policy in place to manage the storage, transport, handling and audit of such substances?
Incident Management	1)	Does the institution have a critical incident management plan which is capable of dealing with terrorist related issues?
	2)	Is a suitably trained and informed person identified to lead on the response to such an incident?

Appendix 4 – External Speaker Request Form & Information/Declaration for Speakers

EXTERNAL SPEAKER CONSENT FORM (STAFF)

- You will need to submit this form to the Vice Principal (Students, Learning & Quality) 15 working days before the event.

Staff responsible for external speaker:				Campus: SD/H/A
Proposed Speaker:				
Contact details of company / external speaker:	Address: Contact Details:			
Topic:				
Location, time and date:	Location: Time: Date:			
Purpose of visit:				
Who will be attending this event? (Please state: course(s) including level, student numbers and any other consideration)				
Background Checks (minimum 2)				Tick to confirm
Website Checked				
Printed Literature Checked				
Resources to be Presented				
Google Search Completed				
Other Colleges Recommended				
Other Checks, please state e.g. translation				
Please tick:				Tick to confirm
I have read the College's Prevent Strategy and Policy				
I will provide the external speaker with the Information for Visiting Speakers				
I will ensure the external speaker completes the Declaration Form				
I will forward the Declaration Form to the Vice Principal (Students, Learning & Quality)				
I have attached outline(s) / copies of resources to use, if appropriate				
Signature			Date:	
Approved / Refused			Date:	
Reason for refusal (if applicable):				

Information for Visiting Speakers and Declaration Form

All visiting speakers must read this document and complete the Declaration Form prior to attending the College

Safeguarding

HSDC recognises the moral and statutory responsibility to safeguard and promote the welfare of all young people. The College makes every effort to provide a safe and welcoming environment underpinned by a culture of openness where both young people and adults feel secure, able to talk and believe that they are being listened to.

HSDC maintains an attitude of “it could happen here” where safeguarding is concerned. Safeguarding is the responsibility of everyone and not just that of the Designated Safeguarding Lead and Deputies.

At all times the College’s approach will focus on PREVENTION, PROTECTION and SUPPORT and the College is committed to fulfilling its’ duties with regard to Safeguarding by:

1. Establishing a safe environment within which young people can learn and develop
2. Supporting students who have been, or are, at risk of significant harm
3. Ensuring we practise safe recruitment in checking the suitability of staff and volunteers who work with young people
4. Carrying out regular Child Protection and Safeguarding Training, in line with legal requirements
5. Publishing and implementing clearly defined procedures for identifying and reporting cases, or suspected cases, of abuse
6. Developing and promoting effective working relationships with other agencies, including the Police and Children Services

Visiting Speakers will be accompanied at all times on-site (unless they are in possession of an appropriate DBS). If during a visit, a Visiting Speaker has any concerns that a member of the College community has been harmed, or is at risk of harm, or receives a disclosure from a student they should contact the safeguarding team or speak to Reception as a matter of urgency.

The full HSDC Safeguarding and Child Protection Policy can be found on the website (<https://www.hsdac.ac.uk/governance-and-management/policies/>.)

Please remember it is the responsibility of all of us to keep our young people safe.

Prevent

Prevent is part of the Government’s National Counter-Terrorism strategy and places a duty on Colleges to have due regard to the need to prevent people from being drawn into terrorism.

At HSDC Prevent is very much part of our Safeguarding work through safeguarding young people from the threat of terrorism by challenging ideologies, protecting vulnerable individuals, and supporting institutions.

All staff have a responsibility in protecting students at risk from radicalisation and any suspicious activity should immediately be referred to a member of the safeguarding team.

British Values

At HSDC we see fundamental British Values as underpinning what it is to be a citizen in a modern and diverse Great Britain. As well as actively promoting these values to our students, we also embed these into student work across all curriculum areas.

The five key British values are **democracy, the rule of law, individual liberty, mutual respect and tolerance of different faiths and beliefs**. These serve as a foundation to our College Charter where we promote equality and diversity throughout our community, and meet our duty to the Counter-Terrorism and Security Act 2015.

The **Safeguarding Team** can be contacted on:

safeguarding@hsdc.ac.uk

Declaration Form (To be completed by the visiting speaker) (Please read Information for Visiting Speakers overleaf)

Name of Speaker:

Dates in College:

- ☐ I am not banned or disqualified from working with children nor subject to any sanctions or conditions on my employment imposed by the Disclosure and Barring Service, the Secretary of State or regulatory body.
- ☐ I understand that, where appropriate, my session should actively promote the fundamental British values of democracy, the rule of law, individual liberty, and mutual respect and tolerance of those with different faiths and beliefs and at no point undermine these.
- ☐ I understand that it is the College's intention for all who study and work at the College, regardless of their age, race, social and cultural background, linguistic background, gender, Special Educational Needs and Disability (SEND), religious views and beliefs, marital status, sexual orientation, pregnancy or maternity, gender reassignment, political views, or trade union membership to have equality of opportunity.
- ☐ I understand that while on the College site I must be supervised by an employee of the College unless I have the required DBS check and the prior agreement of the College.
- ☐ I understand that my event may be recorded / filmed by the College. These recordings are for future reference and to prevent the abuse of trust and will not be made public without my consent.

I declare that the information I have given on this form is complete and accurate.

Signed:

Date: