

PREVENT DUTY POLICY

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1. Introduction

The Prevent duty forms section 26 of the [Counter-Terrorism and Security Act 2015](#) which places a statutory duty on specific sectors to have 'due regard to prevent people from being drawn into terrorism'.

There is specific [guidance in relation to this duty for higher education institutions in England and Wales](#).

The Prevent duty has three main objectives:

- tackle the ideological causes of terrorism
- intervene early to support people susceptible to radicalisation
- enable people who have already engaged in terrorism to disengage and rehabilitate

The overall aim of the counter-terrorism strategy, [CONTEST](#), is to reduce the risk from terrorism to the UK, its citizens and interests overseas, so that people can go about their lives freely and with confidence. Prevent remains one of the key pillars of CONTEST, alongside the other three 'P' work strands:

* Prevent: to stop people becoming terrorists or supporting terrorism:

- Pursue: to stop terrorist attacks
- Protect: to strengthen our protection against a terrorist attack
- Prepare: to mitigate the impact of a terrorist attack

Whilst NLTG believe we are a low level threat organisation, we work on the assumption "It may happen here."

2 Scope

North Lancs Training Group manages Prevent as part of its welfare and safeguarding activities. We are committed to maintaining a safe, inclusive and supportive environment where all members of NLTG community are encouraged to engage in debate and to pursue both academic and non-academic interests. Freedom of speech and academic freedom are central to NLTG's mission to enable learners and staff to collaborate. We are also committed to the values of inclusivity, ambition, openness, fairness and respect which mirror society's British Values.

In line with this, we will not tolerate abuse, threats, incitement to violence, hatred, discrimination or other unlawful acts in exercising these rights.

3. Policy Intent

The aim of this policy is to help people from becoming terrorists or supporting terrorism. Prevent also extends to supporting the rehabilitation and disengagement of those already involved in terrorism.

The Prevent duty requires specified authorities such as ourselves in education to help prevent the risk of people becoming terrorists or supporting terrorism. It sits alongside long-established safeguarding duties on our professionals to protect people from a range of other harms, such as substance abuse, involvement in gangs, and physical and sexual exploitation. The duty helps to ensure that people who are susceptible to radicalisation are supported as they would be under safeguarding protocols.

4. Legislation / Legal Requirements

NLTG recognises it has a statutory duty and to fulfil this duty, which include guidance within:

- [Keeping Children Safe in Education](#)
- [Working Together to Safeguard Children](#)
- [Prevent Duty guidance for England and Wales](#)
- [Counter Terrorism Strategy 2023](#)

NLTG will also take into consideration any localised themes / activities in line with the current threat level.

5.0 Responsibilities

Whilst everyone has a responsibility to uphold the Prevent Duty and the associated British Values, NLTG has a specific safeguarding team that review all Prevent related activities in addition to safeguarding activities on a regular basis. See [Safeguarding Policy NL1500](#) for current SG Team Members.

5.1 Named Persons

Role	Name	Contact Details
NLTG Designated Safeguarding Lead*	Gareth Lindsay	01254 397119
NLTG Safeguarding Officer*	Carl Morris	01254 300768
NLTG Safeguarding Officer (Deputy Lead)	Mark Taylor	01254 397119
Prevent Lead	Gareth Lindsay	01254 397119
Managing Director	Gareth Lindsay	01254 397119
NLTG Chairman	Matt Deighton	01204 368413
Operations Director	Collette Humphreys	01254 397119
Quality of Education Director	Robin Lindsay	01254 397119

*Designated Responsible persons

5.2 NLTG Board of Directors

NLTG Board of Directors will have regard to the latest legislation as per section 4 to ensure effective governance and overall compliance of this policy and compliance with the law at all times.

The Managing Director / Prevent Lead will keep the NLTG Board of Directors informed of NLTG Prevent arrangements, performance, and any pertinent changes / requirements on an ongoing basis, taking leadership responsibility for NLTG's Prevent arrangements.

The Managing Director (Prevent Lead) will communicate / liaise with the Board specifically (in conjunction with the DSO's) on a frequent basis to ensure the following

- The Board are kept up-to-date with Prevent responsibilities and relevant data
- The Board receive appropriate Prevent training on joining the board which include bi-annual refreshers.
- The Board are aware of local multi-agency / Channel arrangements

5.3 Prevent Lead / DSL

The Prevent Lead in conjunction with the DSO's will:

- Update the Board on a regular basis as to Prevent within NLTG whilst ensuring the Board are aware of their responsibilities and resources required
- Be committed to the safeguarding of Learners and Staff in NLTG which includes Prevent awareness and duties
- Promote the Prevent Duty and British Values to learners, staff and employers within NLTG community
- Ensure processes are in place to keep informed of current legislation, statutory and other guidance with regards to Prevent, cascading the information accordingly
- Act as a source of support, advice and expertise to staff on matters of Prevent and when deciding whether to make a referral by liaising with the relevant agencies
- Attend all safeguarding related meetings, i.e. SG Team, DSL Meetings
- Ensure the SIRS system is maintained, accurate and secure with written records of concerns, cases, referrals etc
- Input into the design of safeguarding systems, policies and procedures

5.4 Companywide approach

All staff are expected to uphold the values embedded within the Equality Act 2010 at all times and they should use any relevant opportunities to promote embed and exemplify British Values wherever possible.

Staff are expected to challenge any extremist behaviour, including language and attitudes. Specific education training will be given to those who work directly with learners.

Staff are made aware of how to identify individuals at risk of radicalisation. This includes recognising the vulnerability factors associated with those most at risk (see appendix 1).

Identification of concerns might include, although this list is not exhaustive:

- Overheard comments which suggest extremist attitudes
- Intolerant attitudes or views
- Third party reports of concerns about behaviour e.g. plans to travel abroad or extremist activities
- Direct disclosure of vulnerability
- Evidence of discriminatory treatment of other groups or individuals
- Evidence of bullying behaviour or harassment
- Evidence of non-compliance with NLTG's expectations of behaviour / code of conduct
- Possessing, accessing extremist materials
- Expression of extremist views on any social media platform, e.g. Facebook, LinkedIn
- Use of extremist language
- Threats of violence
- Exclusion of certain groups or individuals in team sports or enrichment activities which appear to be for extremist or discriminatory reasons
- Expression of views which are discriminately against protected groups or individuals
- Evidence of use of social media both internally and externally which raises concerns

6.0 Training

It is important that everyone regardless of job role in NLTG should know why radicalisation is relevant to their setting and how it may present. As a starting point, everyone at NLTG should be able to demonstrate an awareness and understanding of the risk of radicalisation by ensuring and recording that appropriate staff undertake training, particularly on radicalisation. By understanding the risks, as well as how to raise a concern, those under the Prevent duty play a role in ensuring that people who are at risk of being radicalised can have their views challenged where appropriate, receive suitable support and be diverted away from terrorism.

NLTG acknowledge that the appropriate training does differ depending on a person's role. The frequency and type of training required depends on factors such as the local context, risk and the nature of their responsibilities and function and is determined by an organisational assessment of training needs.

The Home Office provides free [GOV.UK Prevent duty training](#) to support those under the duty. Other support, including face-to-face training, may be available. We expect all frontline staff working for specified authorities to have reasonable and appropriate understanding of extremist and terrorist ideologies, and training should be provided on this.

6.1 New Starts

Prior to starting at NLTG, all employees are issued with Part 1 from KCSIE which must be signed off as reviewed following the induction. This also includes a separate quiz to check knowledge which is certificated separately with a week of start via the Learning Hub.

At Induction, our HRM / DSO will conduct a safeguarding session in the afternoon detailing safeguarding practices, code of conduct, Prevent and British Values. The new start will also be required to confirm receipt and review of the associated documentation. Further to this, all colleagues within 4 weeks of start will be required to complete the assigned safeguarding course, in addition to the ETF / Prevent course for learning facing staff. Non-learner facing will have the basic Prevent awareness session. All individuals will also be assigned the NOC Prevent Course.

6.2 Ongoing training

All staff are kept topical with emerging/priority issues and newsletters distributed by the safeguarding team. Staff can use such resources to provide relevant information, advice and guidance as part of our pastoral support to learners, employers and the wider community. A wide variety of resources are available to staff to use and disseminate via the NLTG Safeguarding SharePoint site, Safe Equal and Well (SEW), National Online College and CPD/Learning Platforms.

6.3 Digital Safety and Prevent:

NLTG endeavor to promote digital safety and acceptable use of electronic communications, within North Lancs Training Group settings to support the Prevent Duty and pay due regard to prevent individuals from being drawn into terrorism.

NLTG recognises that there is an in increased danger of radicalization through electronic communications, this may be through accessing inflammatory material or through online grooming.

It is possible that learners and staff may choose to access extremist material via the NLTG IT system either within a learning Centre or on equipment provided by an NLTG staff member (i.e. during a workplace visit). As such, there are safeguarding measures in place to ensure that staff and learners are not put at risk of accessing these materials accidentally, by prohibition, which may be inappropriate or illegal. Firewalls, Monitoring and filtering systems are detailed in our [Digital Safety Policy](#) allow NLTG to block and investigate and take appropriate action where applicable.

6.4 Curriculum Delivery

Prevent training is embedded into areas of curriculum delivery. This ensures that learners are made aware of the Prevent Duty as per legislative requirements.

All Study Programme (SP), Traineeship and Work Based Learning (WBL) learners undertake Prevent, British Values and Equality and Diversity training as part of their induction to their programme. All other learners will be assigned training that is appropriate to the course duration and content, e.g. commercial courses.

6.5 Employers and Parents

Signposting for [Employers](#) and [Parents](#) is available within the Employer and Parent section on the NLTG website which contains both advice and training courses dependent on the individual's needs.

7.0 Radicalisation

Radicalisation is the process of a person legitimising support for, or use of, terrorist violence. Most people who commit terrorism offences do so of their own agency and dedication to an ideological cause.

There is no single profile of a radicalised person, nor is there a single pathway or 'conveyor belt' to being radicalised. There are many factors which can, either alone or combined, lead someone to subscribe to terrorist or terrorism-supporting ideology. These factors often include exposure to radicalising influences, real and perceived grievances – often created or exacerbated through grievance narratives espoused by extremists – and a person's own susceptibility ie young Learners may be more susceptible to radicalisation into terrorism. Similar to protecting learners from other forms of harms and abuse, protecting children from this risk is a part of NLTG's wider safeguarding approach.

7.1 Extremism

Extremism is the promotion or advancement of an ideology based on violence, hatred or intolerance that aims to:

1. Negate or destroy the fundamental rights and freedoms of others; or
2. Undermine, overturn or replace the UK's system of liberal parliamentary democracy and democratic rights; or
3. intentionally create a permissive environment for others to achieve the results in (1) or (2)

7.1.1 Extremism Aims Definitions expanded (Directgov)

- 1) *"Behaviour against a group, or members of it, that seeks to negate or destroy their rights to live equally under the law and free of fear, threat, violence, and discrimination. Including:*

Using, threatening, inciting, justifying, glorifying or excusing violence towards a group in order to dissuade them from using their legally defined rights and freedoms."
- 2) *Attempts to undermine, overturn, or replace the UK's system of liberal parliamentary democracy and democratic rights. Including:*
 - *Advocating that the UK's parliamentary democracy and democratic values and rights are not compatible with their ideology, and seeking to challenge, overthrow, or change our political system outside of lawful means.*
 - *Using, threatening, inciting, justifying, glorifying or excusing violence towards citizens, in order to dissuade them from participating freely in the democratic process.*
 - *Subverting the way public or state institutions exercise their powers, in order to further ideological goals, for example through entryism, or by misusing powers or encouraging others to do so.*
 - *Using, threatening, inciting, justifying, glorifying or excusing violence towards public officials including our armed forces, police forces and members of local, devolved or national legislatures, in order to dissuade them from conducting their obligations freely and fearlessly, without external interference.*
 - *Establishing parallel governance structures which, whether or not they have formal legal underpinning, seek to supersede the lawful powers of existing institutions of state.*

3) Intentionally creating a permissive environment for behaviour in aim 1 or aim 2. Including:

- *Providing an uncritical platform for individuals or representatives of groups or organisations that have demonstrated behaviour in either aim 1 or aim 2.*
- *Facilitating activity of individuals or representatives of groups or organisations that have demonstrated behaviour in either aim 1 or aim 2, including through provision of endorsement, funding, or other forms of support.*
- *The dissemination of extremist propaganda and narratives that call for behaviour in either aim 1 or aim 2.*
- *Attempts to radicalise, indoctrinate and recruit others to an ideology based on violence, hatred or intolerance, including young people.*
- *Consistent association with individuals or representatives of groups or organisations that have demonstrated behaviour in either aim 1 or aim 2 without providing critical challenge to their ideology or behaviour.*
- *If any behaviour listed in aim 1 or aim 2 has occurred previously, a refusal by the individual, group or organisation that conducted the behaviour to rescind, repudiate or distance themselves from the behaviour.*

The lawful exercise of a person's rights (including freedom of thought, conscience and religion, freedom of expression, freedom of association, or the right to engage in lawful debate, protest or campaign for a change in the law context as to the freedom of speech in this setting is available [here](#)

The types of behaviour below are indicative of the kind of promotion or advancement which may be relevant to the definition and are an important guide to its application.

7.2 Susceptibility to radicalisation

A person's susceptibility to radicalisation may be linked to their vulnerability. [A person can be vulnerable](#) if they need special care, support or protection because of age, disability, risk of abuse or neglect. A person's vulnerabilities may be relevant to their susceptibility to radicalisation and to the early intervention approach that is required to divert them away from radicalisation.

In other cases, vulnerabilities may not be present or relevant to the early intervention approach required. Not all people susceptible to radicalisation will be vulnerable, and there are other circumstances, needs or other underlying factors that may make a person susceptible to radicalisation but do not constitute a vulnerability.

7.3 Understanding and identifying radicalisation and extremism risk in education settings

How learners become susceptible to radicalisation

There's no single way of identifying whether a learner is likely to be susceptible to radicalisation into terrorism.

The process of radicalisation is different for every individual. It can take place over a long period, or it can be very quick.

Learners who are vulnerable to grooming for sexual exploitation, criminal exploitation or county lines, may also be vulnerable to radicalisation. Factors could include things like being a victim or witness of crime, abuse or bullying, or having personal or emotional difficulties. (See Appendix 1 for more factors relating to vulnerability and extremism)

Adverse childhood experiences, combined with specific influences from family and peers or online connections, may make someone more susceptible to radicalisation.

Extremist influences could include, but are not limited to:

- family members having direct contact or involvement with extremist or terrorist groups
- staff members of an education or community setting promoting an extremist ideology
- peers promoting an extremist ideology or sharing extremist material
- access or exposure to online extremist material via social media or the internet - for example, propaganda including pictures, videos, blogs and fake news
- exposure to extremist, terrorist or other violent activity in overseas settings
- access or exposure to extremist leaflets, magazines or stickering
- exposure to extremist groups hosting marches, protests or stalls

7.4 Risk factors

Push and pull factors can make a learner at risk of extremism or radicalisation. Often there are several risk factors present that, seen together, can cause concern.

7.4.1 Push factors:

Push factors may include a learner feeling:

- isolated
- they do not belong
- they have no purpose
- low self-esteem
- their aspirations are unmet
- anger or frustration
- a sense of injustice
- confused about life or the world
- real or perceived personal grievance

7.4.2 Pull factors:

Pull factors could include an extremist or terrorist group, organisation or individual:

- offering a sense of community and a support network
- promising fulfilment or excitement
- making the learner feel special and part of a wider mission
- offering a very narrow, manipulated version of an identity that often supports stereotypical gender norms
- offering inaccurate answers or falsehoods to grievances
- encouraging conspiracy theories
- promoting a 'us versus them' mentality
- blaming specific communities for grievances
- encouraging the use of hatred and violent actions to get justice
- encouraging ideas of supremacy

7.5 Radicalisation risk indicators

There is no single route to radicalisation. However, there are some behavioural traits that could indicate that a learner is susceptible to radicalisation into terrorism.

Radicalisation is not a linear process. Learners may express a combination of behaviours at different times. NLTG staff members should consider an individual's behaviour in the context of wider influencing factors and vulnerabilities.

In some cases, you may speak with the learner and their parents or carers (if under 18). You should also consider contextual, vulnerability and protective factors to make a comprehensive assessment of risk and harm.

Where concerns are evident, the DSO / Prevent Lead are made aware and where applicable a written record of all concerns, discussions and decisions made and the reasons for those decisions held within SIRS (Safeguarding Incident Recording System).

Tell the police immediately if you think a learner:

- is about to put themselves or others in immediate danger
- appears to be involved in planning to carry out a criminal offence

8.0 Prevent Risk Assessment

We have a [Prevent Risk Assessment](#) in place which is overseen by the Designated Safeguarding Officers reviewed on a regular basis.

9.0 Reporting a Prevent concern

9.1 Reporting

All staff must report any Safeguarding and Prevent concerns to the Prevent Lead / DSO as named in 5.1 who will open a SIRS where applicable which would be shared appropriate parties.

9.2 Referrals

Prevent's second objective is to intervene early to stop people from becoming terrorists or supporting terrorism. This means providing bespoke interventions for people who are susceptible to radicalisation.

Prevent referrals are likely to be made in the first instance by people who come into contact with those who appear to be at risk of being radicalised. There is no single model of a person's radicalisation journey or single profile of a radicalised person. Frontline professionals, when deciding whether to make a referral, should consider whether they believe the person they are concerned about may be on a pathway that could lead to terrorism.

Signs that extremist views are being adopted, including changes in behaviour that might signal a concern, can be used to consider whether a referral should be made to seek support under Prevent. In determining whether a concern meets the threshold for referral to Prevent, it is important to consider the harm posed to the person, as well as whether accessing support through Prevent might stop potential wider societal harm committed by the person.

The process will vary, but when a concern is identified, the [notice, check, share procedure](#) should be applied as outlined in the Prevent duty GOV.UK awareness course. Specified authorities including NLTG should use the [Prevent national referral form](#).

9.3 Channel

Following a referral an assessment will be carried out which should determine the most appropriate forum to discuss the referral. Those who are appropriate for consideration at Channel are subject to a further, more detailed Prevent assessment led by the Channel case officer. This assessment is informed by information sharing with wider Channel partners.

Once the assessment and multi-agency information gathering is complete, where appropriate, and where the Channel panel agrees, the person may be adopted into Channel and receive tailored support to reduce their susceptibility to being radicalised into terrorism.

Where NLTG are aware of an learner engaging with Channel, this will be recorded on the SIRS system and monitored accordingly. NLTG acknowledges multi agency involvement in Channel is essential to ensure the full range of information is accessible to the panel, so that susceptibility, vulnerabilities, risk and support needs can be fully assessed.

9.4 Reporting cases the Department for Education

NLTG will ensure it notifies the Department via the Customer Help Portal: Home - [Customer Help Portal](#) (education.gov.uk) of incident(s) and/or where a referral has been made, where NLTG is aware of:

- an incident, or pattern of incidents, which undermines the promotion of British fundamental values and /or the ability to comply with the Prevent Duty by an NLTG employee.
- a referral of an individual member of NLTG Personnel for the purposes of determining whether that employee should be referred to a panel for the carrying out of an assessment under section 36 of the Counter- Terrorism and Security Act 2015 of the extent to which that individual is vulnerable to being drawn into terrorism.

10 Safeguarding / Prevent Records

10.1 Recording

All Prevent Referrals / Serious concerns are recorded within the company's own internal systems. (SIRS)

It is understood that information held in regard to learners/individuals can be defined within the scope of special category of personal data and is processed in line with the company's data protection policy. Data collected in relation to safeguarding of an individual is held securely and accessed by, and disclosed to, individuals only for the purposes of ensuring the safeguarding/wellbeing of the individual.

All records relating to the Data Protection Policy will be maintained in a safe and secure location SIRS upholding confidentiality for a period of no less than 7 years from the date of closing the case as per our traceability and retention policy [NL0614](#).

10.2 Information sharing (external)

NLTG may need to share information about people to ensure, for example, that a person at risk of radicalisation is given appropriate support, such as on the Channel programme. When sharing personal data, specified authorities must comply with the requirements of data protection legislation as it applies to them.

It is important to remember that data protection legislation is not intended to prevent the sharing of personal data, but to ensure that it is done lawfully and with appropriate safeguards in place. While information-sharing should be considered on a case-by-case basis.

The Information Commissioner's Office [provides advice on the requirements of the data protection legislation for organisations](#). There may be some circumstances where specified authorities, in the course of Prevent-related work, identify someone who may already be engaged in illegal terrorist-related activity. If someone is suspected of being involved in such activity, the police should be informed immediately.

NLTG adopts the information sharing protocols recommended in local and national guidance. Any requests for information sharing will be considered by the Designated Safeguarding Prevent Lead / Officers who will comply with relevant guidance, policies and procedures. [PF0095](#) details the specific procedures for the sharing of information (both NLTG invoked sharing and sharing requested by external organisations).

The DSL / DSO should ensure detailed, accurate, secure written records of all concerns, discussions and decisions made including the rationale for those decisions. This should include instances where referrals were or were not made to another agency such as LA children's social care or the Prevent program etc.

10.3 Record analysis

DSO's and the Prevent Lead analyze safeguarding and Prevent concerns via the Annual SIRS Summary report held on NLTG's Intranet. This identifies trends across our provision and to identify emerging issues that can be incorporated into delivery of provision to endeavor to reduce recurrence amongst existing and future learners. (It should be noted however that due to the low number of cases recorded, specific trends are difficult to identify.)

Board members and attendees of the business review meetings receive an annual report for the previous year at the first meetings of the academic year. NLTG staff are also updated at the first team briefing of the academic year in addition to receiving ongoing general updates.

The 2023/24 report has been adapted from the previous year to clearly demonstrate trend analysis over previous years, as opposed to a single "snapshot" of the year and a written description.

11.0 Support for Staff

NLTG is aware that safeguarding / Prevent cases can be distressing and that staff who have been involved may find it helpful to talk about their experiences, in confidence, with their Line Manager and / or the DSO / DSL in addition to the Employee Assistance Programme.

12.0 Partnerships

NLTG work with local organisations to support this policy. These organisations include the local Prevent Team, Safeguarding Children Partnership, Young People's Services and Social Services. Where appropriate the NLTG Designated Responsible person will contact / report to the appropriate services in the locality in which the learner lives.

Periodically NLTG use external speakers for supporting curriculum delivery. All such activities will be assessed for risk via [NL1513](#) Freedom of Expression in conjunction with the External Speakers Policy [NL1513a](#) and be carried out in the presence of an NLTG employee to monitor / intervene if content delivery or activity becomes inappropriate to the audience, e.g. related to safeguarding or radicalisation concerns etc.

NLTG aim to raise employer awareness of the Prevent Strategy via distribution of information, health and safety appraisals, learner induction, social media, e-shots and appropriate in-house training, i.e. Local Prevent Coordinator and Regional Prevent Coordinator – Claire Liddle - Prevent.northwest@service.education.gov.uk (RPC)

13.0 Monitoring and review

Quality assurance of this policy and supporting procedures will be reviewed on a regular basis by the DSO/SG Team.

14.0 Further information about the Prevent Duty can be found

- [Understanding and identifying radicalisation risk in your education setting](#)
- [Managing risk of radicalisation in your education setting](#)
- <http://www.preventforfeandtraining.org.uk>
- <https://act.campaign.gov.uk/>

15.0 Other associated documentation

- Safeguarding Policy
- Prevent Risk Assessment
- Data Protection Policy
- Digital Safety Policy
- Lockdown Procedure

Appendix 1

