



PREVENT Policy

Policy owner:	Rambert School Board of Trustees
Lead contact:	Academic Registrar & Head of Compliance (PREVENT SPOC)
Audience:	Applicants for School courses of study/students/staff
Approving body:	Board of Trustees
Date approved:	June 2023
Policy Implementation date:	September 2022 (this version September 2023)
Supersedes:	Rambert School PREVENT Policy Sept 2022
Previous approved version(s) dates:	September 2022
Review cycle:	Annually
Next review due date:	Spring 2024
Related Statutes, Ordinances, General Regulations	Counter-Terrorism and Security Act 2015, Counter-Terrorism Strategy (CONTEST) 2018, UK Government PREVENT Strategy 2011, PREVENT Duty Guidance 2019
Related Policies, Procedures and Guidance:	Rambert School PREVENT Strategy; RS PREVENT Risk Assessment & Action Plan; School Safeguarding policy
UK Quality Code reference:	Quality Code Expectations for Quality; Advice and Guidance: Concerns, Complaints and Appeals; Enabling Student Achievement; Student Engagement
OfS Conditions reference:	Conditions B2, B3, C1, C2; OfS monitoring of institutional compliance with the PREVENT Duty
Equality and Diversity Considerations:	Policy should be available in accessible format for all students. There are likely to be additional contextual considerations for students who are defined as disabled under the Equality Act (2010), or who are particularly vulnerable, which should be taken into account in the event of any action required by the School as part of fulfilling its duties under the PREVENT legislation.
Date Equality and Diversity Assessment Completed:	March 2022

Further information:

See OfS guidance: <https://www.officeforstudents.org.uk/advice-and-guidance/student-wellbeing-and-protection/counter-terrorism-the-PREVENT-duty/>

This policy is adapted from the Conservatoire for Dance and Drama PREVENT policy that was informed by Northern School of Contemporary Dance, which includes guidance taken in part from the document 'Safeguarding Children and Young People from the Threat of Violent Extremism' produced by Leeds Safeguarding Children Board.

PREVENT Policy

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1. Background

- 1.1 Section 21 of the Counter-Terrorism and Security Act 2015 (the Act) places a duty on certain bodies, listed in Schedule 3 to the Act, to have “due regard to the need to PREVENT people from being drawn into terrorism”. The Act states that the authorities subject to the provisions must have regard to this guidance when carrying out the duty.

- 1.2 'PREVENT' is part of the Government's multi-strand antiterrorism strategy 'Contest'. Prevent is directed towards stopping people becoming terrorists or supporting terrorism. It introduces a related statutory duty which states that a range of public and other bodies, including 'relevant higher education bodies' (RHEBs) should, in the exercise of their functions, have 'due regard to the need to prevent people from being drawn into terrorism'.
- 1.3 An updated national Contest Strategy (of which Prevent is one strand) was published in June 2018¹. The statutory duty came into force for HE in September 2015. HEFCE was charged with developing and implementing a monitoring framework. Statutory guidance has been published by HM Government for HE providers on the implementation and monitoring of the Prevent Duty.
- 1.4 In April 2018, the Office for Students became the monitor for Prevent in HE and published a revised approach to monitoring in September 2018.
- 1.5 The current threat from Terrorism and Extremism in the United Kingdom is real and severe and can involve the exploitation of vulnerable people, including children and young people. This policy is designed to provide a clear framework to structure and inform our response to safeguarding concerns for those young people who may be vulnerable to the messages of extremism. In addition, it provides details of the local inter agency process and expectations in identifying appropriate interventions based on the threshold of need and intervention model and the Channel process.
- 1.6 Rambert School is a higher education provider and a Recognised Higher Education Body on which the PREVENT duty falls. The School's governing body has established and agreed a Risk Assessment and Action Plan relating to PREVENT. The School manages its PREVENT Duty via policies and procedures that are implemented at School-level, as set out in its Action Plan.
- 1.7 The School's PREVENT work is intended to deal with all kinds of terrorist threats to the UK. Threats to safety and security originate from a range of extremist groups. The School recognises that the PREVENT duty extends to persons who may be either students or staff.
- 1.8 The School's PREVENT work depends on effective partnership within its own structures, between the School and its educational partners, national partners (BIS, OfS) and appropriate local PREVENT partners.
- 1.9 In order for the School to discharge its duties appropriately, the Board of Trustees must work with the Senior Management Team of the institution to ensure the School has due regard for the PREVENT Duty. Key roles in relation to PREVENT within the internal structure of the School are set out below:

1

https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/716907/140618_CCS207_CCS0218929798-1_CONTEST_3.0_WEB.pdf

Governance

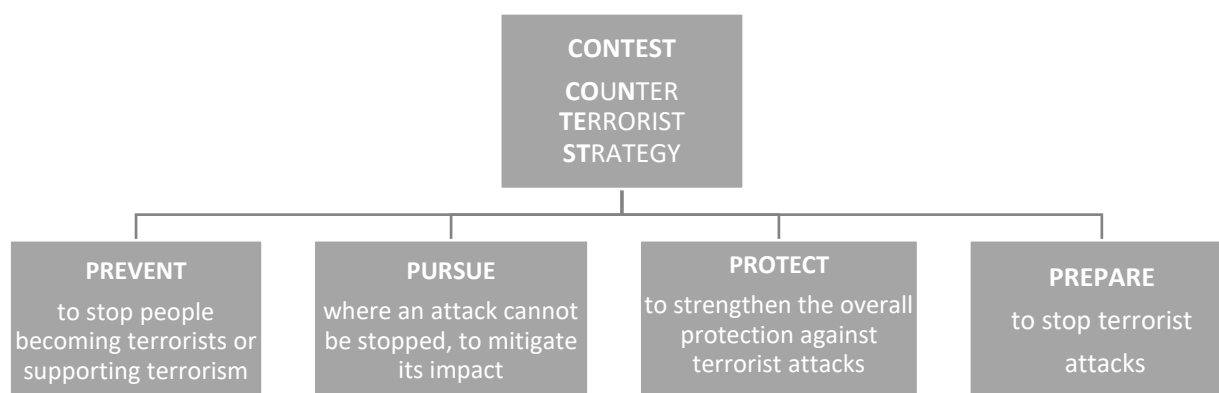
- School Board of Trustees (governing body): has overall responsibility for ensuring that the School discharges its PREVENT duty; presents an annual monitoring report to OfS
- School HR Committee, supported by the School Senior Management Team, has management oversight of the implementation of the School PREVENT action plan and risk assessment; reviews and reports to the Board of Trustees on the discharging of the PREVENT duty.

Management

- **Board of Trustees:**
 - inputs to the Action Plan and owns the School's actions in relation to PREVENT, supported by the Board's sub-Committee 'HR Committee';
 - ensures that appropriate policies, procedures and networks are in place within the School to enable the PREVENT duty to be discharged
- **Academic Registrar and Head of Compliance** acts as PREVENT Single Point of Contact (SPOC):
 - supports the School Chief Executive, Principal and Artistic Director to discharge the PREVENT duty;
 - has designated responsibility for Channel referrals / liaison;
 - prepares reports for and on behalf of the Board of Trustees
- **School Chief Executive, Principal and Artistic Director:**
 - has management oversight for the implementation of PREVENT duty within the school
 - determines arrangements for cover in the event of the non-availability of the normal SPOC.

2. National Policy and Strategies

- 2.1 In response to this considerable challenge, the Government has developed a counterterrorism strategy, known as **CONTEST**.
- 2.2 The aim of **CONTEST** (an abbreviation of **COUNTER TERRORIST STRATEGY**) is to reduce the risk to the UK and its interests overseas from international terrorism to that people can go about their lives freely and with confidence.
- 2.3 The PREVENT agenda is regarded as a challenging strand of the CONTEST strategy as all the work undertaken within this area of work sits within the non-criminal space, i.e. before any criminal activity has taken place.
- 2.4 The **CONTEST** strategy has 4 key strands of work that have a different role to play in tackling the threat from extremism:



Further information about the CONTEST strategy can be found here:

<https://www.gov.uk/government/publications/counter-terrorism-strategy-contest-2018>

3. PREVENT and Rambert School

- 3.1 While the School acknowledges the current level of national threat at any point in time, the small size of the School means that the senior management has good general oversight of activities within the School. This, combined with the nature of the vocational educational training delivered by the School in the performing arts, means that the judgement of the School is that the general risk of radicalisation is **manageable**.
- 3.2 As a Higher Education Provider, the School strongly supports the principles of freedom of speech and academic freedom within the Law. While freedom of speech and academic freedom are key principles, the School recognises that they also have a legal and moral duty of care for staff and students.

- 3.3 Nevertheless, the School recognises its duty of due regard under the PREVENT Act. Through this policy and the associated actions in its action plan, including the provision of effective campaigns of awareness, training and formalising of appropriate mechanisms, the School intends to further reduce the likelihood of occurrence and also reduce the likely impact on the individuals concerned and on the organisation of any incident which might occur.
- 3.4 It also recognises that, on occasion, the performing arts may deal with extremist subject matter. It is committed to ensuring that, where appropriate, extremist subject matter which may be encountered by students in the course of their training, is contextualised by staff.
- 3.5 In particular, it considers that work to protect vulnerable individuals from violent extremism and the threat of radicalisation falls within the safeguarding arena and is no different to safeguarding individuals from a range of other forms of harm and abuse.
- 3.6 In this regard:
- radicalisation is usually a process and not an event, and it is possible to intervene in this to PREVENT vulnerable people being radicalised;
 - there is a need to ensure that activities are proportionate, and focused upon people at risk;
 - activity needs to address all forms of extremism. The Channel programme aims to support people who are at risk of being drawn into extremist activity. This involves several agencies working together to give individuals access to services such as health and education, specialist mentoring and diversionary activities;
 - people with mental health issues or learning disabilities may be vulnerable to radicalisation, and it is important that all staff working in health and social care are aware of possible signs of radicalisation and how to refer people for further support;
 - PREVENT work for the School's educational work and activities is key, but needs to be proportionate. Priorities are:
 - To ensure that all School staff and guest/visiting teaching staff know what to do if they see signs of radicalisation or have any concerns;
 - To ensure that all School staff and guest/visiting teaching staff understand how the School's manages its obligations in regard to the PREVENT Duty, which is using a Safeguarding first approach;
 - To reduce risks of exposure to extremist views in our provision and activities;
 - To collaborate with agencies to identify children and vulnerable individuals at risk of radicalisation and to protect them from harm

Further information on the UK Government's PREVENT strategy can be found here:

<https://www.gov.uk/government/publications/PREVENT-duty-guidance>

4. Definitions and vulnerability factors

- 4.1 The UK Government PREVENT Strategy defines extremism as follows:

“Extremism is 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. We also include in our definition of extremism calls for the death of members of our armed forces, whether in this country or overseas.”

- 4.2 The PREVENT Strategy defines radicalisation as follows:

“Radicalisation refers to the process by which a person comes to support terrorism and forms of extremism leading to terrorism.”

- 4.3 Radicalisation is usually a process, not an event. During this process, there may be opportunities to intervene in order to reduce the risk of the individual being attracted to extremist ideology and causes and safeguard him/her from the risk of radicalisation. It is important to be able to recognise the factors that might contribute towards the radicalisation of an individual. Indeed, some of the factors that lead an individual to becoming radicalised are no different to those that might lead individuals towards involvement with other activity such as gangs, drugs, sexual exploitation, etc.
- 4.4 Those involved in extremist activity come from a range of backgrounds and experiences. There is no single profile of what an extremist looks like or a 10-point plan of what might drive an individual towards becoming radicalised.

Vulnerability factors

- 4.5 A variety of factors might contribute towards an individual becoming radicalised. A table setting out some of the factors which might contribute is set out in Appendix 1 to this policy.

5. Sensitive Materials

What is sensitive material?

- 5.1 From time to time staff or students may, in the course of studies or research (including artistic research) conducted in association with Rambert School, identify a need to consult materials that are security sensitive. This includes information of a kind likely to be useful to a person committing or preparing an act of terrorism.
- 5.2 Section 58 of the Terrorism Act 2000 makes it an offence if a person 'collects or makes a record of information of a kind likely to be useful to a person committing or preparing an act of terrorism.' A modification by the Counter-Terrorism and Border Security Act 2019 also introduced the offence of viewing or otherwise accessing via the internet documents or records containing information likely to be useful to a person committing or preparing an act of terrorism. There is a defence if the information is used for academic research purposes.

- 5.3 Sections 2 and 3 of the Terrorism Act 2006 outlaw the dissemination of terrorist publications, including by electronic means, and give a very wide definition of 'terrorist publication' and 'statements' that could be construed as encouraging or inducing the commission, preparation or instigation of acts of terrorism. Section 2 of the Terrorism Act 2006 has been amended by sections 5(6) and 5(7) of the Counter-Terrorism and Border Security Act 2019. Academic research is not a defence under the Terrorism Act 2006.

Protocols for security-sensitive research

- 5.4 Where a member of staff or a student wishes to undertake research involving or potentially involving security-sensitive materials, the following protocols must be followed:

- 5.4.1 All proposed security-sensitive research must receive ethics approval from the Research & Ethics Committee.
- 5.4.2 Security-sensitive research material should be kept off personal computers and on specially designated Rambert School servers authorised by the Head of Studies or the Chief Executive, Principal & Artistic Director. This material could be accessed easily and securely by researchers and would not be transmitted or exchanged either internally or externally.
- 5.4.3 As the institutional PREVENT Single Point of Contact, the Academic Registrar & Head of Compliance is the first point of contact for internal School and police enquiries about suspect security-sensitive material associated with the School or a member of the School.
- 5.4.4 Staff and students should be aware of the legal risks of accessing and downloading from sites subject to the provisions of counter-terrorism legislation: reading the IT Acceptable Use Policy is a condition of School email account ownership.
- 5.4.5 The Senior Management Team of the School should ensure that they are aware of where the secure storage of sensitive material is located, and should liaise with the School's IT service providers to ensure appropriate arrangements are in place.
- 5.4.6 Where study or research might necessitate access to such materials, the Head of Studies and/or the Chief Executive, Principal & Artistic Director may as appropriate set conditions for the handling and safe-keeping of the materials; matters may be referred to the Research & Ethics Committee where necessary for consideration and consensus. Conditions may include a requirement to use an approved secure storage facility and oversight of the use of an approved secure storage facility by school management.
- 5.4.7 The School may require handling and storage of security-sensitive material, or plans to use such materials, to be discontinued where conditions set out in this policy are not set, or where it is determined that there is no good reason for the materials to be handled or stored.

Rules for the safe keeping of security-sensitive materials

5.5 All staff and students involved in handling or accessing security-sensitive materials must follow the following rules:

- 5.5.1 All conditions set by the School for the safe-keeping of security-sensitive materials, including general conditions and those set specifically for an individual project, must be complied with at all times;
- 5.5.2 Security-sensitive research material must not be stored on a personal computer, USB device or external hard drive;
- 5.5.3 Security-sensitive research material must not be transmitted to a third party or exchanged either internally or externally.

Discovery of, or concerns about, security-sensitive materials

5.6 Staff or students who discover security-sensitive materials on School property or School IT systems, or who are concerned about unauthorised viewing or handling of such materials, should raise their concerns in confidence with the Chief Executive, Principal & Artistic Director and/or the Academic Registrar & Head of Compliance in the first instance. Students can also contact the Head of Admissions, Registry & Student Support for support and guidance.

6. Support and protocols in Rambert School

- 6.1 As with other safeguarding issues, where a member of staff has any concerns that a person or their family may be at risk of radicalisation or involvement in terrorism, they should speak with the School's Safeguarding Lead (or a member of senior staff) and/or the PREVENT SPOC.
- 6.2 If the concerns about an individual are not serious enough to be escalated or where there is no evidence that the individual is vulnerable to radicalisation, the Safeguarding Lead / PREVENT SPOC may decide that they can be addressed by action within the School. In this case, the School will review the circumstances and take appropriate action to address any concerns; the School will then review whether the concerns remain after this. The School may use the Emergency Powers of Exclusion and Suspension (which are without prejudice) where the assessed risk indicates this may be necessary.
- 6.3 Where it is deemed that there is a risk to an individual in the context of radicalisation to extremist ideology and causes, the individual should be referred to the Channel programme.

7. Channel Programme

- 7.1 Channel² is a key element of the PREVENT strategy. It is a multi-agency approach to protect people at risk from radicalisation. It is run in every local authority in England and Wales, and addresses all types of extremism. It is about early intervention to protect vulnerable children and adults who might be susceptible to being radicalised, which, if left unsupported, could lead to radicalisation. Channel uses existing collaboration between local authorities, statutory partners (such as the education and health sectors, social services, children's and youth services and offender management services), the police and the local community to:
- **identify** individuals at risk of being drawn into terrorism;
 - **assess** the nature and extent of that risk; and
 - **develop** the most appropriate support plan for the individuals concerned.
- 7.2 Channel is about safeguarding persons from being drawn into extremist activity leading to violence against others. It is about early intervention to protect and divert people away from the risk they face before they are involved in any type of illegal activity.
- 7.3 The Channel process identifies those most at risk of radicalisation, and refers them via the local authority or police for assessment by a multi-agency panel. The panel, chaired by the local authority and made up of representatives from different safeguarding areas including health, education and the police, considers how best to safeguard them and support their vulnerability through a support package tailored to individual needs. In the event of a referral, the Channel Panel will meet to discuss the nature and extent of the potential vulnerability of the individual. This is similar to the way in which individuals at risk from involvement in crime, drugs and other social issues are supported.
- 7.4 Partnership involvement ensures that those at risk have access to a wide range of support ranging from mainstream services, such as health and education, through to specialist mentoring or faith guidance and wider diversionary activities. Each support package is monitored closely and reviewed regularly by the multi-agency panel.
- 7.5 Further information about the Channel programme can be found here: https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/964567/6.6271_HO_HMG_Channel_Duty_Guidance_v14_Web.pdf
- 7.6 Case studies can be found at the footnote on the previous page.

² <https://www.gov.uk/government/case-studies/the-channel-programme>

8. PREVENT-related serious incident reporting

- 8.1 The OfS PREVENT-related [serious incident guidance](#) places formal responsibility on all relevant higher education bodies (RHEBs) to determine what constitutes a PREVENT-related serious incident that needs to be reported, and to report it following the principles set out in the note and the associated reporting requirements.

The Office for Students (OfS) expects a provider to report any incidents or developments which:

- **have led to the review and substantive revision of PREVENT-related policies**
- **have caused harm to staff and students or reputational harm**
- **could be reasonably perceived as being related to PREVENT.**

- 8.2 Examples of serious incident reporting include (but are not limited to) **hate crime, arrests and charges, harm** (either reputational harm or harm to staff and students), **failure of PREVENT-related policies and processes**, and **near misses**.
- 8.3 Providers are expected to report an actual or suspected PREVENT-related incident promptly. OfS guidance states that:
- providers should contact the OfS at the time when a potential serious incident is identified, and no later than five days after the incident occurring or being identified;
 - In case of 'near misses', this should be reported as soon as it is deemed that a potential incident would have impacted on PREVENT duty implementation, had it progressed to its conclusion.
 - The OfS does not require personal data to carry out its function, and personal information is not shared as part of this reporting.
- 8.4 The School has a process in place for serious incident reporting as part of its implementation of PREVENT Strategy.³ Further information about PREVENT-related serious incident reporting can be found here: <https://www.officeforstudents.org.uk/media/29154421-d3e7-4989-9e53-94413fd013f9/ofs-PREVENT-related-serious-incident-guidance.pdf>

³ See Implementation of the PREVENT Strategy, Section 4 'Risk Management' further on in this document (pp11-14).

9. Monitoring by the OfS

9.1 Up until 2018, RHEBs' compliance with the duty was assessed through two distinct phases of work:

- an initial assessment of detailed evidence to demonstrate that properly thought through policies and processes are in place, and
- by an ongoing annual reporting exercise consisting of a retrospective annual report covering the previous year's activity to demonstrate that those policies and procedures are being implemented and that they are being properly followed and applied. This was supplemented by risk-based PRMs where significant concerns were raised.

9.2 Information about PREVENT framework for monitoring in HE can be found here:

<https://www.officeforstudents.org.uk/publications/PREVENT-duty-framework-for-monitoring-in-higher-education-in-england-2018-19-onwards/>

In para 35 of the above guidance document, the OfS states:

Ongoing monitoring under the OfS will continue to be focused not only on whether providers have the right policies and processes in place, but primarily on evidence of active and effective implementation. The new approach will be more targeted and responsive than HEFCE's approach, with face to face Prevent review meetings being used more systematically to supplement the desk-based exercise, and heightened engagement for those providers assessed to be at higher risk of non-compliance with the duty.

9.3 Further information about the OfS' involvement with PREVENT duty can be found at the following link: <https://www.officeforstudents.org.uk/advice-and-guidance/student-wellbeing-and-protection/counter-terrorism-the-prevent-duty/>

10. Referrals

10.1 Referrals to the Channel process are coordinated by the police but come from a wide range of sources, including members of the public, social services, youth offending teams and health and education practitioners. If anyone wants to know more about Channel or have a concern about an individual and want to raise a concern, they should contact the School's PREVENT SPOC, who is the Academic Registrar & Head of Compliance. Alternatively, if the PREVENT SPOC is not available, the School Chief Executive, Principal & Artistic Director, or the Head of Admissions, Registry and Student Support, may be contacted.

10.2 When a referral is received, a risk assessment of the individual being referred will be undertaken. If there is evidence of potential vulnerability to radicalisation then a multi-agency panel will meet to consider the risks identified and develop a programme of support and intervention to mitigate those risks. Consent is required from the individual being referred to share their personal information with the panel.

11. Rambert School's PREVENT Strategy

11.1 The School's [PREVENT Strategy](#) is published on the School website. The School's PREVENT Strategy has 4 Strategic Aims:

- 1. Institutional Awareness and Resilience**
- 2. Institutional Compliance**
- 3. Case Management**
- 4. Risk Management**

11.2 The Strategic Aims are supported by Strategic Objectives, and the Strategy sets out the specific actions that will enable the Strategic Objectives (and thus Aims) to be met.

11.3 Below is a broad summary of how the Strategy is implemented, however for monitoring and review purposes, the full Strategy (rather than the summary below) should be used.

Implementation of the School's PREVENT Strategy

Strategic Aim 1: Institutional Awareness and Resilience

Strategic Objective: 1.1 Staff training

- a) Rambert School recognises the need to provide appropriate training for staff involved in the implementation of this duty.
- b) The awareness of staff and students regarding the rationale for PREVENT and the approach being adopted is raised through the provision of information, guidance and briefings. Staff will be advised about how to obtain support for people who may be being exploited by radicalising influences.
- c) Staff in the school who have key roles relating to vulnerable students and staff have been appropriately trained with reference to PREVENT.
- d) The School will have a PREVENT Single Point of Contact (SPOC) with designated responsibility for Channel referrals / liaison. Appropriate arrangements will be in place to ensure cover for this role.

Strategic Objective: 1.2 External Engagement

- e) Wherever possible, the School will work with or through external PREVENT partners to provide training for its staff.
- f) The School will ensure that relevant information is accessible to key staff.

Strategic Aim 2: Institutional Awareness and Resilience

Strategic Objective: 2.1 Preventing and addressing radicalisation

- a) The School will work to balance its responsibilities under the Public Sector Equality Duty and Equality Act (2010) alongside its responsibilities under the Prevent Duty, and will take a proportionate approach to this.
- b) The School will adopt a Safeguarding approach to its PREVENT work, which will be closely aligned with existing Safeguarding and related policies and procedures.
- c) The School will abide by any locally agreed inter-agency procedures relating to Safeguarding.
- d) The School may apply this PREVENT Policy in whole or in part to partnership activities in the course of ensuring it discharges its statutory duties.
- e) The School will encourage students to show kindness and respect to all with particular regard to the protected characteristics set out in the Equality Act (2010). Student induction will cover the PREVENT Duty and radicalisation/extremism.

Strategic Objective: 2.2 Governance

- f) The School Board of Trustees will play an active part in ensuring the School meets its obligations with regard to the PREVENT Duty. This will include:
 - i. Ensuring appropriate policies, procedures and external networks are in place
 - ii. The scrutiny, review and approval of this PREVENT Policy;
 - iii. Ensuring the School's Safeguarding arrangements take into account the procedures and practice of the Local Authority as part of the inter-agency Safeguarding procedures
 - iv. Ensuring the School has clear internal reporting mechanisms for monitoring compliance with the PREVENT Duty
 - v. Submission of an annual monitoring report to the OfS
 - vi. Having a Safeguarding Link Governor aware of the School's PREVENT Strategy and this Policy

Strategic Aim 3: Case Management

Strategic Objective: 3.1 Managing concerns

- a) Any concerns about a student or staff member at potential risk of radicalisation should be raised with the School Safeguarding Lead or a member of the Senior Leadership Team as a Safeguarding concern in the first instance. The PREVENT SPOC should also be notified as a matter of urgency.
- b) The School will ensure that appropriate information-sharing protocols are used at a local level (that are in accordance with Safeguarding information-sharing protocols), and information will only be shared as necessary and on a case-by-case basis.
- c) The School PREVENT SPOC will determine whether referral to an external agency is appropriate; information will be shared with other institutions and key partners where appropriate and legal, in accordance with Safeguarding protocols.
- d) When considering sharing personal information, the School will take account of the following:
 - i. **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*
 - ii. **Consent** - *wherever possible, the consent of the person concerned should be obtained before sharing any information about them*
 - iii. **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), the General Data Protection Regulations (2018) and the Human Rights Act (1998)*
 - iv. **Data Protection Act** and the Common Law Duty of Confidentiality - *in engaging with non-public bodies, a body on which the PREVENT duty falls should ensure that they are aware of their own responsibilities under the Data Protection Act*
- e) The School will manage serious concerns about a person who is under 18 years of age in accordance with the Local Authority's established procedures and arrangements.

Strategic Aim 4: Risk Management

Strategic Objective: 4.1 Risk assessment and outside/visiting speakers

- a) The School will have a robust risk assessment system in place for assessing and rating risks associated with any planned events and visiting speakers, providing evidence to suggest whether an event should proceed, be cancelled, or whether mitigating action is required. This will be supported by appropriate policies and procedures.
- b) The School will manage potential associated risks of planned events and visiting speakers by:
 - i. Having risk assessment systems and approval processes in place;
 - ii. Where relevant and appropriate, vetting materials and content prior to an event;
 - iii. Having supervision in place during events;
 - iv. Empowering supervisory staff to intervene if necessary;

Strategic Objective: 4.2 Online safety and access to terrorism/extremist related materials

- c) The School will implement appropriate steps with regard to online and e-Safety in order to discharge the PREVENT Duty. This may include filtering or other restrictions of access to online content on School IT systems and/or appropriate monitoring of the IT use of staff and/or students
- d) The School will implement policies consistent with the PREVENT Duty to manage instances where online or other extremist or terrorist-related materials may be accessed by staff or students for teaching, learning, research or other purposes which are relevant to the work of the School

Strategic Objective: 4.3 Environment

- e) Prayer and Faith Facilities: As a small specialist institution with around 140 students, individualised pastoral care is available to all students and attendance and engagement of all students is closely monitored. Prayer and faith facility is in place in the School on a request basis; students must seek permission to use it, therefore use is monitored.

APPENDIX 1: Factors which might contribute to an individual becoming radicalised ('Vulnerability Factors')

Below are some of the factors that might contribute towards an individual becoming radicalised; on the following page there is a link to Channel training and the Richmond Local Authority Multi-Agency Risk Assessment Framework.

The list below is not an exhaustive list and the presence of any of these factors does not necessarily mean that an individual will be involved in extremist activity. However, a combination of many of these factors may increase the vulnerability to extremist activity.

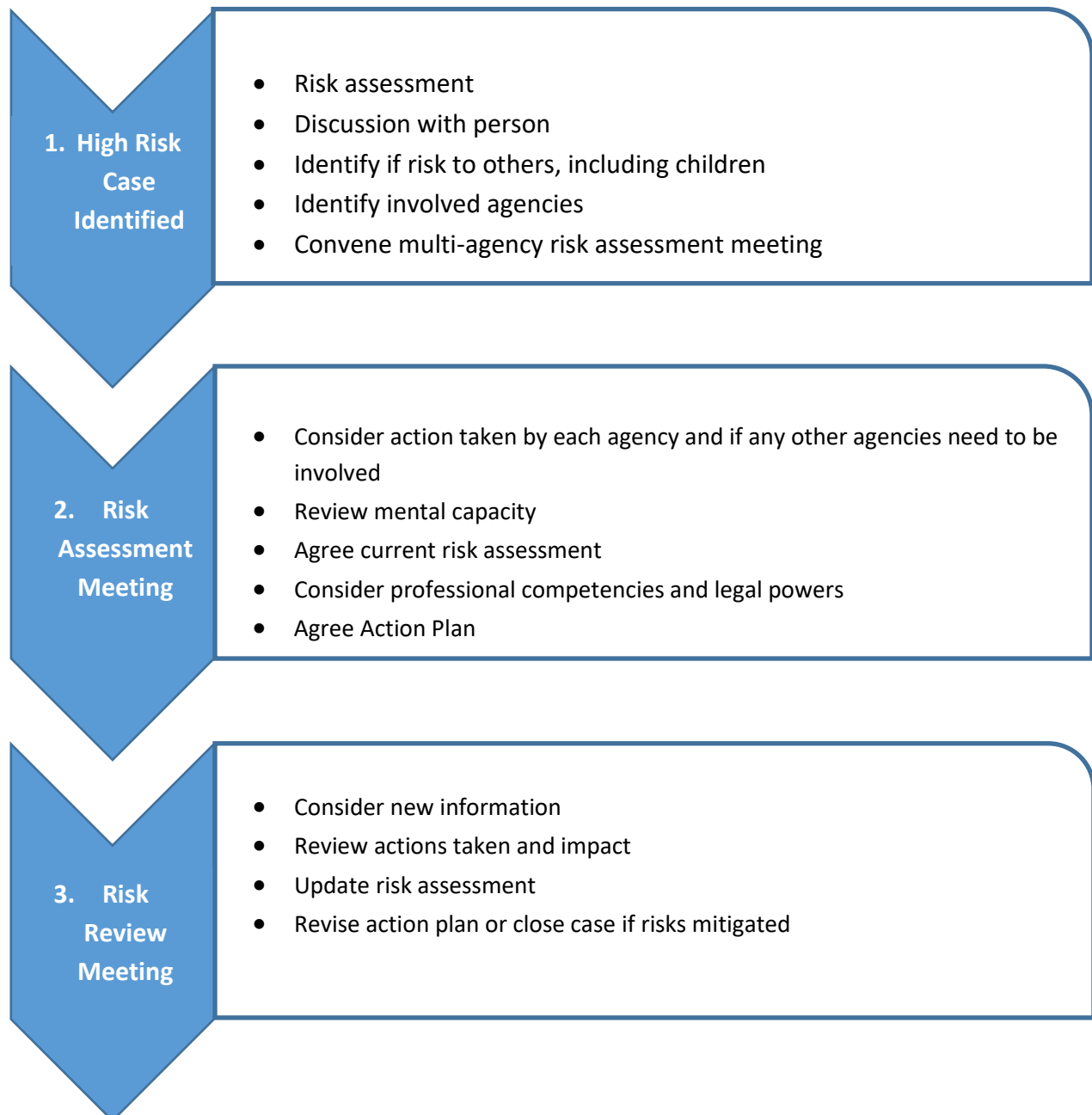
Identity crisis	Distance from cultural/religious heritage and uncomfortable with their place in the society around them.
Personal crisis	Family tensions; sense of isolation; adolescence; low self-esteem; disassociating from existing friendship group and becoming involved with a new and different group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

APPENDIX 2: Channel Training

The link to an e-learning module below provides further information on the Channel process and its purpose and will assist in identifying factors that might make children and young people vulnerable to radicalisation. The module takes 25 minutes to complete and describes your responsibilities and role in relation to the Channel process. A certificate of achievement can be printed once the module has been completed.

https://www.elearning.prevent.homeoffice.gov.uk/channel_awareness/01-welcome.html

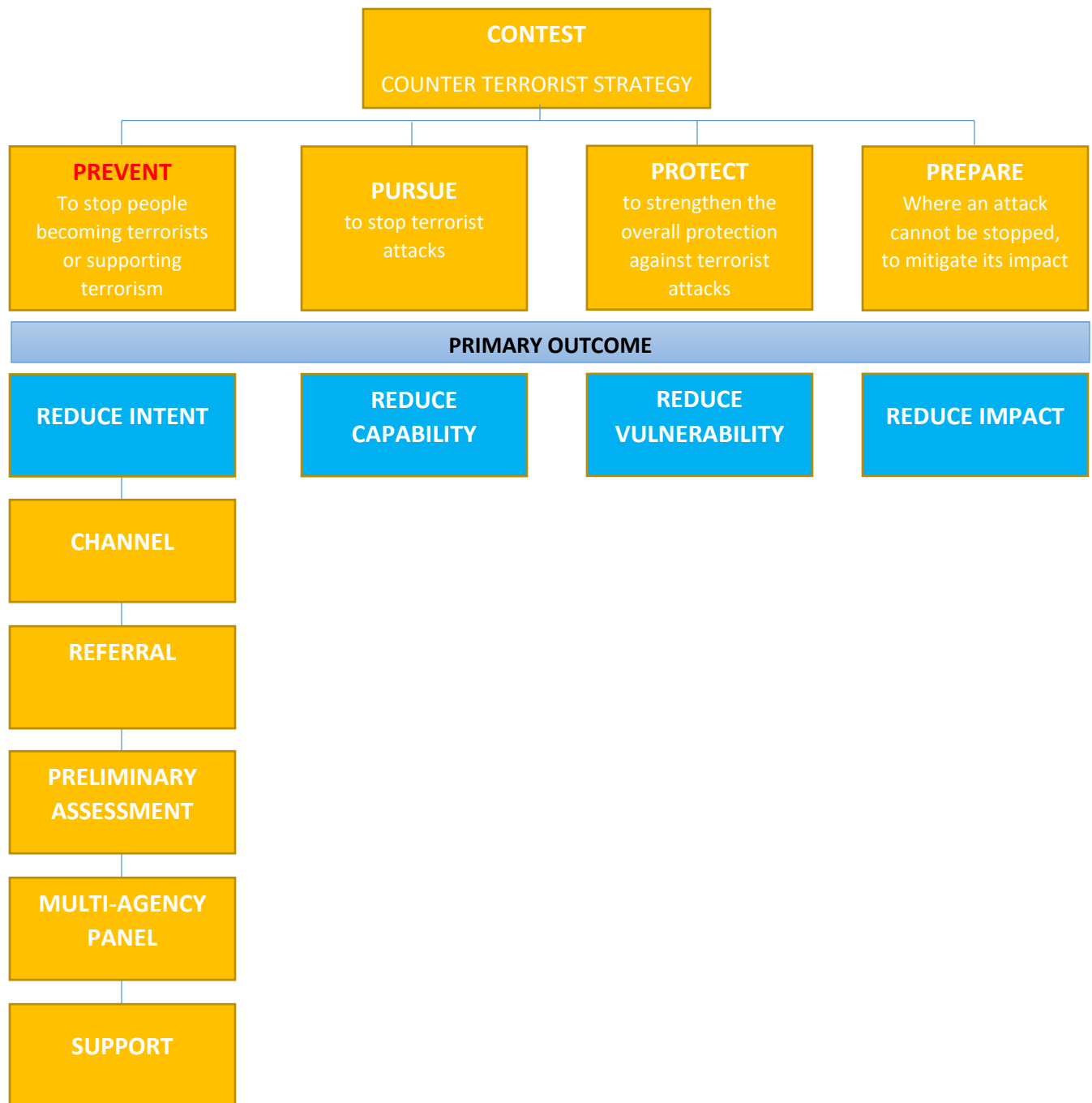
Richmond Local Authority Overview of Multi-Agency Risk Management Process



For full framework see:

https://www.richmond.gov.uk/media/17626/multi_agency_risk_assessment_framework.pdf

Appendix 3: CONTEST Counter-Terrorist Strategy Flow Chart



For full details on the UK Government's Strategy for Countering Terrorism (CONTEST), see: [https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/716907/140618 CCS207 CCS0218929798-1 CONTEST 3.0 WEB.pdf](https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/716907/140618_CCS207_CCS0218929798-1_CONTEST_3.0_WEB.pdf).

APPENDIX 4: Additional Links, Further Sources and Useful Information

UK Government PREVENT Strategy 2011:

(https://www.gov.uk/government/uploads/system/uploads/attachment_data/file/97976/PREVENT-strategy-review.pdf)

UK Government PREVENT Duty guidance 2015:

<https://www.gov.uk/government/publications/prevent-duty-guidance/revised-prevent-duty-guidance-for-england-and-wales>

UK Government PREVENT Duty Guidance for Higher Education Institutions in England and Wales:

<https://www.gov.uk/government/publications/prevent-duty-guidance/prevent-duty-guidance-for-higher-education-institutions-in-england-and-wales>

Counter-terrorism strategy (CONTEST) 2018

(https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/716907/140618_CCS207_CCS0218929798-1_CONTEST_3.0_WEB.pdf)

Statutory Guidance relevant to Higher Education and Monitoring of Higher Education

(<https://www.officeforstudents.org.uk/advice-and-guidance/regulation/counter-terrorism-the-PREVENT-duty/>)

Channel: Protecting vulnerable people from being drawn into terrorism

https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/964567/6.6271_HO_HMG_Channel_Duty_Guidance_v14_Web.pdf

UUK Guidance on External Speakers in Higher Education:

(<http://www.universitiesuk.ac.uk/policy-and-analysis/reports/Pages/external-speakers-in-higher-education-institutions.aspx>)

Safer Campus Communities – resources for Higher Education providers:

(<http://www.safecampuscommunities.ac.uk/resources>)