

HART LEARNING GROUP

PREVENT POLICY



GOVERNANCE AND CONTROL

Date approved by Group CEO	April 2020
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AUDIENCE

Applicable to students?	Yes
Accessible to students?	Yes
Accessible to public?	Yes

PURPOSE

The policy helps us ensure that:

- The Group's commitment to safeguarding staff and learners from radicalism and extremism is reinforced.
- We recognise and implement current practice which contributes to the Prevent agenda including regular and robust training of staff, leaders and Governors.
- We develop and maintain a coordinated action plan.
- We create a place where people are treated with dignity and respect and where we anticipate and respond positively to different needs and circumstances so that everyone can achieve their potential in a safe and welcoming environment.

The Government's counter terrorism strategy CONTEST is composed of four elements, Pursue, Protect, Prepare and Prevent. Prevent aims to stop people supporting terrorism or becoming terrorists. Education, like other key sectors, has a responsibility to promote values of openness, tolerance and facilitating free debate, the attributes central to being a British citizen.

The Prevent Duty is not about preventing students from having political and religious views and concerns, but about supporting them to use those concerns or act on them in non-extremist ways.

DEFINITIONS

- **Prevent:** Section 26 of the Counter-Terrorism and Security Act 2015 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".
- **Extremism:** The Government has defined extremism in the Prevent Duty as: "vocal or active opposition to fundamental British values, including democracy, the rule of law, individual liberty and mutual respect and tolerance of different faiths and beliefs." This also includes calls for the death of members of the British armed forces.
- **British Values:** British values are defined as "democracy, the rule of law, individual liberty and mutual respect and tolerance for those with different faiths and beliefs"; institutions are expected to encourage students to respect other people with particular regard to the protected characteristics set out in the Equality Act 2010.
- **The Group:** refers to the Hart Learning Group (HLG) and for the purposes of this policy, includes North Hertfordshire College, Hart Learning & Development and subsidiary companies employing staff for HLG and the Hart Schools Trust.
- **Staff:** for the purposes of this document, the term staff is used to refer to employees, volunteers, agency workers and contractors.
- **Channel:** the multi-agency panel and process which supports people at risk of being drawn towards terrorism.

RESPONSIBILITIES

The Corporation Board

The Corporation Board, as the Group's governing body, is ultimately responsible for ensuring that the Group is meeting its statutory requirements in relation to the Prevent agenda. Responsibilities include

- Ensuring an effective Prevent Strategy and action plan are in place.
- A member of staff is appointed as lead for Prevent issues with suitably trained staff to deputise in their absence.
- Ensuring a training programme is provided, included for the Governors themselves, which is then tracked and monitored effectively.

Leaders and managers

Leaders and managers have defined responsibilities under the Prevent Duty. They must ensure that:

Partnership

- their institution actively engages, within the organisation and with other partners, as appropriate, including police and local authority Prevent co-ordinators.
- where the size of an institution warrants this, 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

- their institution should have regular contact with their regional further education Prevent co-ordinators.

Policies

- their institution must have clear and visible policies and procedures for managing whistle blowing and complaints
- policies are in place for students using IT equipment to research terrorism and counter terrorism in the course of their studies. JISC can provide support in this area
- the Prevent Duty complements the institution's responsibility under the Equality Act 2010 and covers student welfare, including equality and diversity, the safety of students and staff

Risk assessment and action planning

- a risk assessment is carried out to address the physical management of the institution'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, and/or work in partnership with the institution
- where an institution has sub-contracted the delivery of courses, they should have robust procedures in place to ensure that the sub-contractor is aware of the Prevent duty and the sub-contractor is not inadvertently funding extremist organisations
- that if a risk is identified by or to a leader or manager, they notify their co-ordinator and others as necessary and develop a Prevent action plan. This will enable the institution to comply with the duty and take action to address whatever risks have been identified in consultation with the FE Prevent coordinator.

Internal processes

- at a corporate level, institutions should have robust procedures both internally and externally for sharing information about vulnerable individuals. This should include information sharing agreements where possible
- their institution must have a clear Prevent referral process with a single point of contact which is known to all staff and students. This will usually be the same as the safeguarding process.

Pastoral care

- pastoral care is at the heart of all provision for all providers. The exemplification of British Values and the preventing extremism strategy should be integrated into the pastoral care process
- that there is sufficient pastoral care and support for all students, according to the needs of the particular institution.

Staff Training

- their institution demonstrates that they undertake appropriate training and development for governors or board members, leaders and staff
- staff exemplify British values in their management, teaching and through general behaviours in institutions

- that opportunities in the further education curriculum are used to promote the British values to learners.

The Designated Person

The Designated Person is responsible for:

- Managing referrals and cases
- Referring all cases of suspected radicalisation to the Channel team.
- Liaising with senior staff as appropriate to inform them of issues
- Acting as a source of support, advice and expertise to staff on matters relating to Prevent and when deciding whether to make a referral by liaising with relevant agencies
- Supporting staff who make referrals
- Ensuring accurate records are kept and reported to senior managers and Governors.

Staff

All staff, whether permanent or temporary, are responsible for:

- Complying with the Prevent policy and arrangements.
- Ensuring they have undertaken training in the Prevent Duty as identified by their leaders and managers, including the Principal
- Referring concerns about students, learners or colleagues to the designated staff member for Prevent. For HLG this is the DSP, Emma Masters, or one of the listed Deputy DSPs in the DSP's absence. A full list is provided on the Safeguarding and Prevent area of SharePoint.
- Exemplifying British values of "democracy, the rule of law, individual liberty and mutual respect and tolerance for those with different faiths and beliefs" into their practice.
- Ensuring all guest speakers, including those giving technical demonstrations, are approved on the central register. If they are not yet approved, they should apply for screening using the External Speaker e-Form found on SharePoint.
- Statutory guidance "Keeping Children Safe in Education" updated in September 2019 includes guidance and information in relation to the Prevent agenda. All staff within the Group read and sign to say they have read the document. New staff are required to read this along with other key documents as part of their induction.
- It is every member of staff's responsibility to respond appropriately to students whose behaviours are challenging and inappropriate

REPORTING AND MONITORING

Prevent sits under safeguarding in the Group, led by the Strategic Lead and with operational input from across the various teams, led by Student Services. This policy and accompanying action plan are held in a central online location for quick access and reference. The action plan can be accessed through the Safeguarding and Prevent area of SharePoint under Policies and Procedures.

- Weekly reports that contain concerns raised under Prevent are presented to the Senior Management Team as part of a regular safeguarding update.
- Prevent is included as part of monthly Performance Board papers to senior managers
- Prevent is also included as part of the annual safeguarding report to Governors

TRAINING AND SUPPORT

All staff members and Governors receive training and development appropriate to their role utilising Home Office online learning materials or through delivery by the accredited Prevent trainer.

- Initial training is provided for new staff as part of the induction programme and Introductory Safeguarding training package.
- Refresher training for existing staff is provided as part of the Group mandatory training plan and is undertaken every three years.
- Remote staff living and working a significant distance from Group sites, undertake the Home Office Online Prevent training. However, where possible, this is also complemented by face-to-face training or workshop updates to allow for checking of learning and contextualising to our business need.
- Whilst the Government are revising the current face-to-face training the WRAP materials continue to be used alongside local and national updates provided by the regional coordinators.
- Curriculum staff will undertake planning sessions to explore and develop opportunities to embed Prevent and British Values into teaching and learning.
- It is recognised that some staff require support and encouragement to develop and use the skills required to challenge appropriately. Work will continue to develop Learning Coaches and delivery staff who have the knowledge, skills and confidence to lead debates about controversial issues.
- Student Services Support Coaches are attached to each curriculum area to deal with emerging concerns of students at risk. This supports early intervention and heightened accessibility by curriculum teams. The Support Coaches are line managed directly by the Head of Student Experience and work closely with the DSP at operational level. Their training includes additional safeguarding related training designed to assist and support students in reducing their vulnerabilities to radicalisation and other forms of abuse.

PARTNERSHIP WORKING

The Group has some well-established partnerships in place:

- The Channel team provides a mechanism for assessing and supporting people who may be targeted by violent extremists or drawn into violent extremism.
- Prevent is a standing item for the Hertfordshire Consortium Student Services group which meets twice a year. This includes input from the regional Prevent coordinator for the Eastern region.
- The Group are represented at the East of England Quarterly updates provided by the Eastern Region Counter Terrorism Unit.
- The Group is part of the North Hertfordshire Community Safety Partnership. This is a multi-agency group which includes Prevent as a standing agenda item.
- The Group liaise with and receive regular updates from regional coordinators in all areas in which we deliver across the UK.

Educational partners

- Prevent forms part of the agenda with our educational partner meetings at local consortium level and as part of the National Association of Managers of Student Services (NAMSS).
- The Group are part of the Hertfordshire FE Pastoral Support Network. Part of this work is reducing the vulnerabilities of our students and learners so that they are less likely to become radicalised.
- Child Protection Schools Liaison Officers (CPSLOs) work closely with the Group in aspects around safeguarding children, including supporting those at risk of radicalisation.

REFERRING ON

- Hart Learning Group has a number of confidential methods of raising concerns. An online cause for concern form raises instantaneous concerns records to the DSP and Deputy DSPs for action. Where someone is at immediate risk of danger, a full list of contact numbers is available to staff.
- Where a concern is raised in relation to the Prevent strategy, referrals will be made to the designated senior person (DSP) for safeguarding who will consult with the Hertfordshire Police Prevent Team or relevant county team if the concern is outside of Hertfordshire. Following this consultation, they will refer to Channel if appropriate or another appropriate agency depending on individual need

A CO-ORDINATED STRATEGY

The Group has a range of processes and initiatives that support the Prevent agenda

Curriculum

- The Hart Learning Group systematically reviews its performance to ensure it narrows the attainment gap with vulnerable or disadvantaged groups/communities.
- Learning and Support Coaches provide workshops to enhance expert student skills and further raise awareness of relevant campaigns.
- Guest speakers provide a central part of enrichment and input into employability skills in the Bridge programme. Guest speakers are screened by the DSP, with input from the local police Prevent team where required and placed on an approved speaker list. This list can be found in the central online Safeguarding and Prevent area of SharePoint.
- Where programmes are delivered by third party subcontractors, they are required to provide us with copies of their Prevent strategy as part of due diligence screening.

Student engagement

Student Voice, the Student Governor and the Student Council play a pivotal role in student cohesion across all campuses. Students are engaged at all levels of the organisation to shape and enhance their student experience. A variety of initiatives are utilised to strengthen cohesion of students:

- The Group supports the opportunities for students to interact through structured debates on controversial issues such as moral dilemmas, current affairs and ethics. These take place as part of The Bridge sessions delivered in curriculum areas. This encourages freedom of speech whilst ensuring that students are safe from intimidation or radicalisation.
- Community based work placements
- Training is provided to the Student Governor and Council to ensure they are aware of key factors relating to safeguarding and Prevent.
- The Group runs a series of campaigns throughout the year which provides opportunities to carry out Prevent related awareness work.
- Student led clubs and societies
- Enrichment activities
- Charity fundraising activities
- HLG operates a support email for students to raise concerns to a Support Coach if they do not wish to talk to them directly.

Commercial usage

All commercial bookings to hire our facilities are screened by the Head of Estates in liaison with the DSP and the local police Prevent team where necessary. The Group will not allow bookings from groups with extreme views which promote violence or intolerance.

Ongoing improvements

The Group maintains an ongoing action plan to further improve approaches to Prevent. This was created following an initial review by the Prevent Regional Coordinator and is maintained by staff in the following areas:

- Student Services and Student Experience
- Quality, Teaching and Learning
- Human Resources
- IT
- Curriculum
- Apprenticeships
- Student Governor
- Marketing
- Estates
- Senior Management

The action plan and strategy are led by the DSP and Safeguarding Lead. A central online copy can be found on SharePoint in the Safeguarding and Prevent area.

LINKED POLICIES / PROCESSES

- Safeguarding and Child Protection Policy
- Student Code of Conduct
- Disciplinary Policies
- Attendance & Punctuality
- Health and Safety
- Anti-Bullying Policy
- Single Equality Scheme
- Whistleblowing Policy