Prevent Policy

Policy Owner: Zubair Ahmad

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1. Introduction

This policy has been developed in response to the HM Government Prevent Duty Guidance for Higher Education Providers in England and Wales, and aligns with the College's safeguarding and equality commitments. The guidance is subject to periodic review and updates, reflecting evolving national security, legal requirements, and best practice.

AA London College recognises the UK threat level as Substantial, meaning a strong probability of terrorist activity, and is committed to reducing risks to learners and staff through effective Prevent policies and procedures. The College acknowledges the legal duty under Section 26 of the Counter-Terrorism and Security Act 2015, requiring higher education providers to have "due regard" to the risk of students being drawn into terrorism.

The Prevent Duty underlines the responsibility of higher education leaders to:

- Safeguard learners from radicalisation
- Identify and manage risks of extremist influence
- Ensure appropriate oversight of external speakers and events
- Provide staff training and pastoral support to mitigate risks

2. Leadership, Direction, and Process

AA London College commits to leadership in Prevent governance, integrating it within safeguarding, equality, and welfare responsibilities.

2.1 Leadership and Governance

2.1.1 The College balances Prevent requirements with a commitment to celebrating cultural, religious, and ethnic diversity among staff and learners.

2.1.2 Academic freedom and free speech are maintained, with staff and learners encouraged to explore and debate diverse ideas responsibly.

2.1.3 The College conducts annual risk assessments to evaluate its ability to prevent radicalisation or extremist activity, considering curriculum, partnerships, student demographics, and digital platforms.

2.1.4 The Academic Board oversees Prevent policy implementation, including:

- Approving the policy, risk assessments, and action plans
- Monitoring staff training and learner awareness
- Ensuring effective liaison with external agencies, including Police, local Prevent coordinators, and other relevant authorities
- Ensuring compliance with OfS requirements upon registration

2.2 Prevent Lead

2.2.1 A senior staff member, the **Prevent Lead**, is appointed as the single point of contact, responsible for:

- Coordinating Prevent activities across the College
- Acting as liaison with external agencies
- Ensuring timely reporting of concerns and compliance with statutory requirements
- Maintaining confidential records of Prevent-related incidents
- Advising staff on identifying risks and referrals
- Reporting directly to the Principal/CEO

Note: The Prevent Lead is independent of academic line management to ensure impartiality and avoid conflicts of interest.

2.3 Safeguarding Integration

2.3.1 Prevent is integrated into the College's safeguarding framework and is treated as a safeguarding issue. All Prevent-related concerns will be handled in line with the College's safeguarding policy and procedures.

2.4 Scope

2.4.1 This policy applies to all staff, including full-time, part-time, temporary, agency, and contract staff, as well as all learners, including online and distance learners.

2.5 Communication

2.5.1 Communication of Prevent obligations is ensured through:

- Student and staff handbooks
- College website and learner portal
- Induction sessions and training workshops
- Internal newsletters and staff briefings

2.5.2 Prevent Duty discussions are embedded in staff and student induction and orientation programmes.

2.6 Online Monitoring

2.6.1 The College monitors online and social media content, including the learner portal, to prevent dissemination of extremist material. This is conducted in accordance with the College's IT, data protection and acceptable use policies.

3. Teaching and Learning

3.1 Prevent in Teaching, Learning, and Assessment

3.1.1 The College ensures that teaching, learning, and assessment activities are delivered in accordance with Prevent obligations.

3.2 Promoting British Values

3.2.1 Democracy, rule of law, individual liberty, and mutual respect are integral to teaching and learning. Students develop awareness of their role as responsible citizens, and learning activities emphasise tolerance, equality, and inclusion.

Actions include:

- Incorporating discussions on democracy and rule of law in curricula
- Encouraging debate and critical thinking in classroom and online discussions
- Facilitating student representation in College decision-making
- Group projects and presentations promoting mutual respect and teamwork

3.3 Curriculum Safeguards

- All teaching materials undergo content review to remove extremist or radicalising elements.
- Lesson plans are submitted to the Prevent Lead for review prior to delivery.
- Peer and lesson observations are conducted to monitor teaching approaches.
- Students are encouraged to report concerns regarding teaching content.

3.4 Digital Learning

- Online learning platforms are monitored for extremist material.
- IT policies enforce safe use of College systems and restrict access to radicalising content.

4. Staff Responsibilities

4.1 All staff must:

- Understand the Prevent Duty and their role in implementation
- Recognise vulnerability to radicalisation and indicators of extremism
- Report concerns to the Prevent Lead or Prevent Coordinator
- Remove or report extremist material in College premises or systems
- Participate in annual Prevent training

4.2 Line managers are responsible for ensuring their teams:

- Complete training on Prevent awareness
- Understand internal procedures for reporting concerns
- Support learner awareness activities

4.3 Prevent Lead responsibilities:

- Maintain central record of concerns and referrals
- Provide guidance to staff on Prevent compliance
- Liaise with external agencies for risk assessment and referrals
- Monitor effectiveness of Prevent-related actions

5. Training

5.1 Staff Training

- Induction training for all new staff includes Prevent awareness.
- Annual refresher training ensures staff are up to date with guidance.
- Online e-learning modules and face-to-face sessions are provided.

5.2 Student Awareness

- Prevent Duty covered during induction and orientation
- Ongoing sessions integrated into student welfare and support programmes

5.3 Governance Training

- Academic Board and senior management receive annual Prevent and Channel awareness training

6. Signs of Radicalisation

The College recognises that radicalisation is a **process** that can occur gradually over time. Indicators may present across a range of behaviours, from **insignificant** to **alarming**. The College uses a four-tier behavioural model to support staff in identifying potential risk levels and responding appropriately.

6.1 Behavioural Risk Levels

A. Insignificant Behaviour

This category includes behaviours associated with diverse forms of political, religious, or community engagement, which are characterised by **peaceful actions and democratic means of expression**. These behaviours are not, in themselves, concerning but should be monitored as part of normal safeguarding practice.

Examples include:

- Expresses views or beliefs passionately, including in family discussions
- Takes a stand or campaigns peacefully for a cause
- Shows interest in current national or international events
- Converts or adopts new religious, ideological, or political beliefs
- Expresses a desire to correct perceived social injustices

B. Troubling Behaviour

This category includes individual behaviours that indicate personal changes and may represent an increasing shift towards **ideological influence**.

Examples include:

- Expresses polarising or absolutist views
- Shows distrust or paranoia toward others

- Begins to isolate from family or close friends
- Demonstrates a sense of victimisation or rejection
- Expresses an urgent need to dominate or control others
- Exhibits difficulty recognising alternative viewpoints

C. Worrisome Behaviour

This category describes behaviours that may indicate an **increasing risk of radicalisation** or extremist influence.

Examples include:

- Cuts off ties with family and friends to form a new social circle
- Justifies the use of violence to defend a cause
- Shows obsession with extremist ideology or world view
- Displays symbols or support for extremist groups
- Demonstrates sudden disengagement from education or social activities

D. Alarming Behaviour

This category includes behaviours that indicate a **clear and significant risk**, including intent to support or engage in violent extremism.

Examples include:

- Takes part in violent extremist activities or recruitment
- Encourages others to commit extremist acts
- Is in contact with known extremist individuals or networks
- Commits or plans violent or hateful acts
- Seeks to acquire or use weapons or explosives
- Plans travel to conflict zones or known extremist areas

6.2 How Staff Should Use the Model

Staff are encouraged to:

- Observe behaviours over time and not rely on a single indicator
- Consider context, including safeguarding and mental health factors
- Report any concerns to the Prevent Lead immediately
- Treat all information as confidential and safeguarding-related

7. Process

Notice, Check, Share Procedure

- **Notice:** Identify concerning behaviours (see Section 6).
- **Check:** Discuss concerns internally with Prevent Lead, gathering context and supporting evidence.

- **Share:** Refer concerns externally using the Prevent National Referral Form if required.

Internal Process

1. Staff reports concern to Prevent Lead.
2. Prevent Lead gathers information and interviews individual where appropriate.
3. If concern is legitimate, Prevent Lead initiates external referral.
4. If concern is not substantiated, no referral is made, but monitoring continues.
5. Prevent Lead may seek advice from DfE Prevent coordinators.

External Process (Channel Referral)

1. Serious concerns escalated to the Channel Programme.
2. Multi-agency review conducted, including local authorities, police, and welfare agencies.
3. Risk assessment and support plan developed.
4. Progress monitored and reviewed until vulnerability is mitigated.
5. Follow-up at 6 and 12 months; re-referral possible if risks persist.

8. Risk Assessment

The College conducts comprehensive risk assessments to evaluate:

- Student exposure to radicalisation or extremist influences
- Curriculum vulnerabilities
- Partnership arrangements
- External events and speakers
- Online learning platforms

Actions include:

- Assigning risk levels (low, medium, high)
- Mitigation strategies for curriculum, partnerships, and IT platforms
- Monitoring and reporting mechanisms for risk management

9. Action Plan

Action plans detail:

- Identified risks
- Prevent Lead and staff responsibilities
- Timelines and review cycles
- Mitigation measures

10. Freedom of Speech and Academic Freedom

- Freedom of expression and academic freedom are core values.
- Debate encouraged unless it risks public disorder or incites violence.

- External speakers and events must comply with Prevent guidance.
- Academic staff must deliver content without discrimination or harassment.

11. External Speakers and Events

- All proposed external speakers/events require risk assessment.
- College evaluates speaker affiliations, history, and speech content.
- Events cancelled or speakers banned if risk of radicalisation exists.
- Currently, the College does not host external events but procedures are in place for future use.

External Speaker Risk Assessment Checklist includes:

- Speaker identity and affiliations
- Previous public statements or speeches
- Potential for radicalisation or extremist influence
- Suitability for audience and content
- Safeguarding arrangements and supervision
- Venue and security arrangements

12. Reporting Serious Incidents or Material Changes to OfS

The College will ensure compliance with the Office for Students (OfS) requirements upon registration and will report serious incidents or material changes in line with OfS guidance.

Serious incidents:

- Revisions of Prevent policies
- Harm to staff or students
- Events reasonably linked to Prevent

Material changes:

- Significant changes to policies or processes
- Appointment of new Prevent Lead
- Changes in governance structures
- Changes to campus location or teaching provision

13. Monitoring and Review

- Reviewed annually and ad-hoc as required.
- Academic Board oversees compliance.
- KPIs include:
    - Training completion rates
    - Number of concerns reported and resolved
    - External referrals and outcomes
    - Student awareness surveys

14. Record Keeping

All Prevent-related records, including concerns, referrals, risk assessments, and action plans, will be maintained securely.

15. Useful Contacts

Prevent Lead: Asad Sarwat
Email: contact@londoncollege.co.uk