



HEART OF

**WORCESTERSHIRE
COLLEGE**

Prevent Strategy 2022 - 2023

Approved at Corporation 13 December 2022

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Prevent Strategy 2022/2023

1. Aim of the Strategy

The aim of this strategy is to outline Heart of Worcestershire College's approach to supporting the national 'Prevent' agenda, linked to the safeguarding of our students and staff. This strategy is written with reference to the Prevent Duty contained within Section 26 of the Counter Terrorism and Security Act 2015. The Duty states that specified authorities including Further Education Colleges, in the exercise of their functions, must have 'due regard to the need to prevent people from being drawn into terrorism'.

2. National Context

The National Prevent Strategy, published by the government in 2011, is part of the UK's overall counter-terrorism strategy known as CONTEST. The aim of the Prevent Strategy is to stop people becoming terrorists or supporting terrorism by focusing on the following 3 objectives;

- challenging **ideology** that supports terrorism and those who promote it;
- protecting vulnerable **individuals** from being drawn into terrorism through appropriate advice and support;
- supporting sectors and **institutions** where there is a risk of radicalisation.

The Prevent strategy recognises that people who are engaged in terrorist activities are often initially drawn into extremist narratives and beliefs and that these narratives (violent and non-violent) should be challenged to stop people moving from extremist groups or from extremism into terrorist related activity.

[The Counter Extremism Strategy 2015](#) defines **extremism** as; "the vocal or active opposition to our fundamental values, including democracy, the rule of law, individual liberty and the mutual respect of different faiths and beliefs. We also regard calls for the death of our armed forces as extremist."

Radicalisation is as defined in the Prevent Strategy as "the process by which a person comes to support terrorism and forms of extremism leading to terrorism"

The threat level for the UK is set by the Joint Terrorism Analysis Centre (JTAC). Threat levels are designed to give a broad indication of the likelihood of a terrorist attack.

- **LOW** means an attack is unlikely
- **MODERATE** means an attack is possible, but not likely
- **SUBSTANTIAL** means an attack is a strong possibility
- **SEVERE** means an attack is highly likely

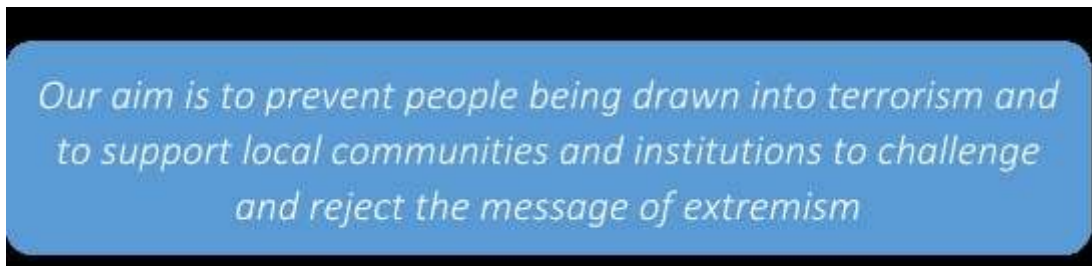
- **CRITICAL** means an attack is expected imminently

The current (Nov 22) threat level from terrorism in the UK is substantial which means that an attack is likely. The Prevent strategy identifies four types of terrorism that the UK faces, these being:

- **International**, terrorist organisations operating in Syria and Iraq (Da'esh and Al Qa'ida and like-minded organisations).
- **Left wing, anarchist, single issue terrorism i.e. militant animal rights (LAIST)**
- **Right wing terrorism (RWT)**
- **Other**, these are often small movements in reaction to a single issue, specific incident, or ideology i.e. Involuntary Celibate (INCEL) movement

3. Worcestershire's Context

Prevent Aim and Objectives



Worcestershire is judged to be at **lower risk**, but it is important not to be complacent, the West Midlands which borders us is second in risk to London and our communities live and work across our political and geographic boundaries.

The close proximity of Worcestershire's border to the more urban areas of the West Midlands, including Birmingham and Coventry, continues to allow a realistic possibility of interaction between neighbouring communities. Particularly areas within the West Midlands region where extremist Islamic ideologies may be more prevalent. Islamist extremism has been classified as a medium threat for Worcestershire. The online threat continues to remain a key enabler of radicalisation for global and regional Islamist extremist groups.

Maintaining a level of trust between public sector organisations and ethnic minority communities is a significant factor in understanding the issues facing those communities. Together we need to promote strong and positive relationships between people from different backgrounds in the workplace, in schools and within neighbourhoods.

Extreme Right Wing (ERT) activity is a high priority threat for Worcestershire due to a number of reports concerning ERW groups looking to radicalise others and individuals exhibiting this ideology. Online vulnerability amongst young people and the prominence of certain right-wing groups in the area continues to remain a significant factor across the region and within Worcestershire. Stickers and graffiti continue to be seen across the county. LASIT (Left Wing, Anarchist, Single Issue Terrorism) remains a low priority for the area. Legal activism continues to occur with regard to animal rights and climate change.

There is a risk from 'lone actors', who are particularly difficult to both detect and identify. In such cases, the internet and social media have proven to be powerful tools for extremists to radicalise individuals. The impact of COVID 19 has increased the levels of concern in this area and the online platforms used for social media have been identified as sources of propaganda, conspiracy theories generating anger towards particular communities or groups and active radicalisation of individuals. There is a particular concern that young people may be vulnerable to a range of risks as they pass through adolescence and may be influenced by others with extremist views and via the internet, including ideas and issues around their own identity.

The objectives for Worcestershire are:

- Embedding Prevent into the mainstream by supporting key services and institutions; and
- Building long term resilience within communities.

The 2022/23 Action plan has been reviewed and agreed and is focussed on key actions as agreed by the Worcestershire Prevent Strategy Group :

- Information sharing on current threats - to inform the risk assessment.
- Proactive encouragement of training across partner agencies.
- Increased focus on Worcestershire based issues including the far right.
- Address gaps in the Prevent priorities and benchmark.
- Updates to partners including education on current extremist activity.

The Counter Terrorism and Security Act 2015

On 1 July 2015, the Counter Terrorism and Security Act (CTSA) 2015 became statutory.

Section 26 of the Counter Terrorism and Security Act 2015 places a statutory Prevent duty on specified authorities in the exercise of their functions, to have 'due regards to the need to prevent people from being drawn into terrorism'.

4. Prevent Duty Responsibilities

All staff including sub-contracted and agency staff, governors and volunteers within an organisation must understand their Prevent related responsibilities, especially in the context of Safeguarding. This will ensure the welfare of learners, staff, volunteers and visitors.

All staff, volunteers and board members should:

- undertake appropriate Prevent duty training identified by leaders and managers
- understand the risk of radicalisation
- implement the Duty effectively
- know how to refer an individual who is vulnerable within our organisation

5. Partnerships, Employer Relationships and Sub-Contracting

The Prevent duty is integrated into agreements with sub-contractors and partner organisations. The Prevent duty guidance states that where an institution has sub-contracted the delivery of courses to other providers, there is an expectation that robust procedures to be in place to ensure that the sub-contractor is aware of the Prevent duty and the sub-contractor is not inadvertently funding extremist organisations.

Policies and procedures relating to this strategy include:

- Safeguarding Policy
- EDI Policy
- Partnership agreements
- IT and Cyber security Policy

- Lockdown Procedure
- Campus Security Policies
- External Speaker's Policy
- Letting Policy
- External Events Policy
- Professional Code of Standards for Staff
- Information Sharing Policies
- Charity and Fundraising Policy

6. Awareness of the Prevent Agenda

- Prevent is 1 of the 4 elements of 'CONTEST', the government's counter-terrorism strategy. The 4 elements are: Pursue, Protect, Prepare and Prevent. It aims to stop people from becoming terrorists or supporting terrorism.
- The Prevent strategy responds to the ideological challenge we face from terrorism and aspects of extremism and the threat we face from those who promote these views.
- It provides practical help to prevent people from being drawn into terrorism and ensures that they are given appropriate advice and support.
- It works with a wide range of sectors (including education, criminal justice, faith, charities, online and health) where there are risks of radicalisation.
- It covers all forms of terrorism, including far right extremism and some aspects of non-violent extremism.

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

7. 2022 - 2023 Prevent Strategy

The 2022 –23 Prevent Strategy will build on our previous Prevent work. As the threat from extremists in this country and abroad evolves we must also evolve and ensure our approach moves into the digital age. We will work in partnership with statutory, non – statutory, private and voluntary sector organisations to support, educate and divert individuals and groups that may be at risk of radicalisation.

The College was inspected in 2018 by Ofsted and the following comments were made in relation to the prevent duty.

The college has appropriate safeguarding procedures that are routinely updated to reflect current practice and expectations, and this includes the 'Prevent' duty action plan. Managers ensure that all staff and governors are suitably trained, and that teachers and support staff ensure that learners and apprentices are supported well in developing a good understanding of how to protect themselves from the risks associated with radicalisation and extremism.

The HoW College Prevent Strategy recognises that there is no single factor to radicalisation and those vulnerabilities in individuals such as age, deprivation, low self-esteem, frustration and anger, along with a lack of protective factors (employment, education, family and social networks) can make an individual vulnerable to radicalisation.

The Police and Office for Security & Counter Terrorism (OSCT) provide support to Local Authorities nationally to assist them in focusing on the key strategic threats, risks and vulnerabilities locally. This is to ensure that a proportionate and effective response is delivered where required in order to safeguard individuals and ensure the safety of the public.

The HoW College Prevent Strategy will continue to tackle all forms of extremism and will continue to prevent radicalisation by identifying risk at the earliest possible stage by safeguarding individuals through appropriate support mechanisms (Channel) before risk establishes itself at a more severe and or harmful level.

The **Protect Duty**, previously known previously as 'Martyn's Law', will be a new piece of anti-terrorism legislation, designed to ensure the public is better protected from a "multifaceted, diverse and continually evolving" terror threat. Its purpose has been outlined as to "keep people safe by introducing new security requirements for certain public locations and venues to ensure preparedness for and protection from terrorist attacks". It follows a campaign from Figen Murray, the mother of Martyn Hett who sadly lost his life in the Manchester Arena terrorist attack in May 2017, who has highlighted the need to improve security standards in crowded public spaces and venues.

The Protect Duty will extend and apply across the UK and will now go through the various stages of the legislative process, including readings in the House of Commons and House of Lords before it becomes law. In recognitions and preparation for this new duty, the College has begun to target activity and develop more understanding to enable the development of future strategies (eg SCaN).

The HoW College Prevent Strategy objectives form the basis of the HoW College Prevent Action Plan:

8. The Objectives

- To continue to reinforce awareness of the 'Prevent' agenda across the College
- To recognise current practice that supports the 'Prevent' agenda
- To support and protect vulnerable **individuals** from being drawn into terrorism through appropriate advice and support
- To ensure effective **partnerships** are in place to support the delivery of the Prevent strategy and action plan, actively engages, within the organisation and with other partners, as appropriate, including police and local authority Prevent coordinators and use data sharing protocols as appropriate
- To ensure the correct level of pastoral care is in place and that pastoral care is at the heart of all provision with the exemplification of British Values integrated into the pastoral care process
- To ensure appropriate training and development for governors and leaders and wider staff and that training is current and reviewed
- For staff to exemplify British Values in their management, teaching and through general behaviours
- Opportunities in the curriculum are used to promote the British Values to learners and build resilience
- To ensure key policies and procedure reflect the Prevent agenda when sub- contracting the delivery of courses, having 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
- To ensure the Prevent duty is integrated with sub-contractors and partner organisations
- To ensure the College is preparing for the new Protect Duty

9. Current College Practice Which Contributes to Prevent

- The College Safeguarding Policy features reference to the Prevent agenda to ensure it is recognised alongside all protective and preventative work we do to safeguard our students, visitors and members of staff.
- The College has strong links with the West Mercia Police Prevent Lead, Regional Prevent Lead Further and Higher Education (West Midlands).
- Awareness is raised across all forms of media. Posters have been provided for College staff workrooms to inform and remind staff of the Prevent agenda.
- The Designated Safeguarding Lead / Single point of contact for Prevent attends the Counter Terrorism Local Profile briefing and sensitive information is shared with the College Senior Leadership Team.

- The Designated Safeguarding Lead attends the Worcestershire Prevent Strategy Group representing further education in the region. The Prevent Strategy Group is made up of Specified Authorities.
 - These are:
 - WCC Public Health and Adult Social Care
 - The District, City and Borough Councils (may nominate joint representatives)
 - West Mercia Police
 - National Probation Service
 - West Mercia Community Rehabilitation Company
 - Youth Justice Service
 - Worcestershire Children's First (Including Education Safeguarding)
 - Community Safety
 - Worcestershire Acute Hospitals NHS Trust
 - Worcestershire Health and Care NHS Trust
 - University of Worcester
 - West Midlands Police
- The Designated Safeguarding Lead attends the newly formed 'Worcestershire Prevent Problem Solving Group' which has been set up as a small working group of partners discussing and sharing current issues to mitigate the influence of terrorist or extremist groups.
- Prevent is an aspect of the mandatory Safeguarding training sessions that staff have to undertake during probation and every 3 years to maximize the opportunities for expert input to develop staff awareness. In addition, a Prevent update is included in the annual safeguarding update for all staff. The Designated Safeguarding Lead has attended full Prevent training through Worcestershire Safeguarding Children's Board and West Mercia Police. The Deputy Designated Safeguarding Lead is qualified as a WRAP (Workshop Raising Awareness of Prevent) trainer.
- In addition, due to raised levels of concern resulting from the pandemic and specifically young people spending more time online or alone without the wider social opportunities, the Regional Prevent Lead for the West Midlands delivered additional training to staff in 20/21 to provide awareness of key areas and a local context.
- Our work to promote Equality Diversity and Inclusion within College incorporates British Values contributes to good community relations and reduces the risk of radicalisation.
- CPD sessions on incorporating British Values into teaching, learning and assessment are available on the staff file.
- Mainstream political parties can be invited into College to support democracy related events. The College will not allow representation at such events from parties with extreme views which promote violence or intolerance.
- Policies and procedures are updated to consider the Prevent agenda.
- Robust internet monitoring procedure is in place through Smoothwall.
- Robust visitor and visiting speaker process in place.
- Prevent action plan and risk assessment is in place.
- Teaching and learning sessions show appropriate integration of the Prevent agenda including fundamental British Values. This is monitored throughout quality processes inc learning walks and peer observation process.
- Student awareness of the Prevent agenda and their role in preventing radicalisation is developed each year. Students receive tutorial sessions through the THRIVE programme to raise awareness of the risks of radicalisation and how to keep themselves safe online. This includes awareness of fake news and how to develop credible research skills. In addition, the Colleges Elements programme seeks to address skills within our learners to be curious and question using critical thinking skills.
- Our work to promote Equality and Diversity within the College incorporates British values¹, contributes to good community relations and reduces the risk of radicalisation.
- A centralised approach has been taken communication with parents. Awareness has been raised with parents regarding internet safety, safeguarding etc.
- Lockdown policy in place

- The College invests in cybersecurity and has achieved Cyber essentials plus and Endeavour Cyber Essential Accreditation
- Mandatory Cyber essentials training course for staff.
- Robust firewall (PaloAlto networks) and Anti-Virus software is in place. Site tested using testfiltering.com site test for compliance.

Appendix 1 - The Worcestershire Channel Panel

The Channel Duty

Channel is an early intervention multi-agency process designed to safeguard vulnerable people from violent extremism and/or terrorism. Channel works in a similar way to other safeguarding partnerships, such as case conferences for children in need.

Channel is a pre-criminal process designed to support vulnerable people at the earliest possible opportunity, before they become involved in illegal activity. It is a voluntary process allowing the individual to withdraw from the programme at any time.

Channel is aimed at individuals of any age at risk of exploitation by extremist or terrorist ideologues. Early intervention can prevent individuals being drawn into terrorist-related activity in a similar way to preventing them from getting involved in criminal activity such as drugs, knives or gangs. Involvement in the Channel programme is both voluntary and confidential. Individuals may opt out of the intervention process should they wish to. If the individual receives support through Channel, it will not give them a criminal record.

Referrals to Channel come from a wide range of partners including education, health, youth offending teams and social services through the usual adult or children's safeguarding process. They can also come from partner agencies and members of the public.

When referrals are received, they are screened for suitability through a preliminary assessment by the triage team in WCC (Public Health, Children's Services and Adult Services Prevent Leads). If a referral is considered suitable, it will be passed to and discussed at the Channel Panel meeting. Prevention of Extremism and Radicalisation.

The Channel Panel is chaired by the Senior Public Health Practitioner and brings together a range of multi-agency partners to collectively assess the risks in relation to an individual and decide whether a support package is needed. The panel may include statutory and non- statutory partners, as well as lead safeguarding professionals.

If the panel feels that an individual who has been referred would benefit from support, a bespoke package of support will be tailored for that individual based on their particular needs and circumstances.

Participation in Channel is entirely voluntary, and a person will always be informed first if it is felt that they would benefit from Channel support. For children, parental consent is required before Channel support can be put in place. The process of obtaining consent is managed carefully by the Channel Panel.

Once a referral is made, it is shared with the partner agencies and with the Prevent Team at West Mercia Police. These all search their records for further triangulation to determine whether the individual has raised any concerns in their own organisations.

The individual is then discussed at the next Channel Panel for consideration whether they are appropriate for intervention.

Channel interventions are delivered through local partners and specialist agencies. The support packages are designed to reduce a person's vulnerabilities.

For example, support packages can focus on health, education, employment or housing, as well as putting in place specialist mentoring or faith guidance and broader diversionary activities such as sport. The referrer will be updated as to the outcome of any process.

Appendix 2 - Glossary of terms from the Prevent Duty Guidance

‘Having due regard’ means that the authorities should place an appropriate amount of weight on the need to prevent people being drawn into terrorism when they consider all the other factors relevant to how they carry out their usual functions.

‘Extremism’ is defined in the 2011 *Prevent* strategy as vocal or active opposition to fundamental British values, including democracy, the rule of law, individual liberty and mutual respect and tolerance of different faiths and beliefs. We also include in our definition of extremism calls for the death of members of our armed forces, whether in this country or overseas.

‘Interventions’ are projects intended to divert people who are being drawn into terrorist activity. Interventions can include mentoring, counselling, theological support, encouraging civic engagement, developing support networks (family and peer structures) or providing mainstream services (education, employment, health, finance or housing).

‘Non-violent extremism’ is extremism, as defined above, which is not accompanied by violence.

‘Prevention’ in the context of this document means reducing or eliminating the risk of individuals becoming involved in terrorism. *Prevent* includes but is not confined to the identification and referral of those at risk of being drawn into terrorism into appropriate interventions. These interventions aim to divert vulnerable people from radicalisation.

‘Radicalisation’ refers to the process by which a person comes to support terrorism and extremist ideologies associated with terrorist groups.

‘Safeguarding’ is the process of protecting vulnerable people, whether from crime, other forms of abuse or (in the context of this document) from being drawn into terrorist-related activity. The current UK definition of **‘terrorism’** is given in the Terrorism Act 2000 (TACT 2000). In summary this defines terrorism as an action that endangers or causes serious violence to a person/people; causes serious damage to property; or seriously interferes or disrupts an electronic system. The use or threat must be designed to influence the government or to intimidate the public and is made for the purpose of advancing a political, religious or ideological cause.

‘Terrorist-related offences’ are those (such as murder) which are not offences in terrorist legislation, but which are judged to be committed in relation to terrorism.

‘Vulnerability’ describes the condition of being capable of being injured; difficult to defend; open to moral or ideological attack. Within *Prevent*, the word describes factors and characteristics associated with being susceptible to radicalisation.

Appendix 3 – Monitoring of The Strategy

- Corporation annual reporting
- SLT
- Safeguarding Board

Safeguarding Board - this group will monitor the Prevent Duty and will involve additional staff in other posts where necessary:

Deputy CEO
Designated Lead for Safeguarding
Deputy Designated Lead for Safeguarding
Head of HR
CRQ Manager Inclusive Learning
Curriculum, Resource & Quality Manager

These will:

- Monitor the Prevent risk assessment and make recommendations
- To monitor the Prevent action plan to ensure it is response and developmental
- Review of staff training and effectiveness
- Review student feedback through surveys, deep dives and action plan for any gaps

Appendix 4 - HoW College Prevent 22/23 Risk Register (reviewed using NEW FE Prevent toolkit)

| No | Risk Title | Potential Risks | Existing Controls | Further Actions |
|----|---------------|--|---|--|
| 1 | Online Safety | <ul style="list-style-type: none"> Extremist organisations are able to radicalise students online and encourage them to commit acts of violence or incite others to commit acts of violence as 'lone actors'. Learners (and staff) are able to access unlawful radicalising material which promotes proscribed terrorist groups. The impact of COVID 19 has increased the levels of concern in this area and in particular the online platforms used for social media have been identified as sources of propaganda, conspiracy theories generating anger towards particular communities or groups and active radicalisation of individuals | <ul style="list-style-type: none"> Smoothwall system IT Acceptable use policy Student are made aware of online safety in THRIVE tutorial sessions Element's programme developing critical thinking skills Digital induction for students Staff training raising awareness of online safety and the risk of students being radicalised. Promotion of British Values in the curriculum Fake news awareness through THRIVE. Encourages learners to challenge and report unlawful materials. Student portal has direct referral button added. Central student emails. Parent communications – inc Reminders to staff /student and parents regarding local context (i.e. following graffiti) Mandatory Cyber essentials training course for staff. Robust firewall and Anti-Virus software in place. Endeavour Cyber Essential Accreditation Desktop and server patches deployed in a 2-week window. 2FA installed on systems | <ul style="list-style-type: none"> Use of THRIVE tutorial/ material for Apprenticeship induction Additional 'online safety' question added to Arrivals Survey for FE and to the Apprentice Arrivals survey. Cloud Based disaster recovery, will be fully operational March 23 SIEM (Security Information Event Management) solution to be implemented, to provide further insight/early warnings of network infiltration. This project will run over the academic year 22/23 |

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| 2 | Partnership | <p>The College does not establish effective partnerships with organisations such as the Local Authority, Police Prevent Team, DfE Regional Coordinator and others.</p> <p>The result is that the College is not fully appraised of national and local risks and does not have access to developing good practice advice or supportive peer networks.</p> | <ul style="list-style-type: none"> Relationship with Regional Prevent Co-ordinator established. DSL attends Counter terrorism meeting where the Counter-terrorism local profiles (CTLP's) are shared. Established links with Local authority Prevent team Local risk is reviewed. DSL on Worcestershire Safeguarding Children's partnership as FE representative. Deputy DSL on Worcestershire's Get Safe Strategic partnership. DLS and Deputy DSL member of National Association of Managers of Student Services (NAMSS) where good practice is widely shared. Deputy DSL chairs regional NAMSS meeting where good practice is shared. Established link on the local community safety partnership. Ofsted report 2018 - Managers have developed effective partnerships with key local agencies to support and safeguard learners both at college and in the community. DSL attends Worcestershire Prevent Strategy Group representing FE. DSL attended Worcestershire Prevent Problem Solving Group | <ul style="list-style-type: none"> New regional Prevent coordinator in post from Aug 2022 – established connection in place. |
| 3 | Leadership | <p>Leaders within the College do not understand the requirements of the Prevent Statutory Duty or the risks faced by the college and the Duty is not managed or enabled at a sufficiently senior level.</p> <p>The result is that the College does not attach sufficient priority to Prevent Action plans (or does not have one) and therefore action to mitigate risks and meet the requirements of the Duty are not effective.</p> | <ul style="list-style-type: none"> SLT fully aware of Prevent strategy. CTLP updates. ETF online training completed by managers and leaders. SLT approve Prevent Strategy, risk review and action plan Prevent Strategy is approved by Governors Risks reviewed annually Ofsted report 2018 recognised the college has appropriate safeguarding procedures that are routinely updated to reflect current practice and expectations, and this includes the 'Prevent' duty action plan. DSL phase lead representative on Schools /head teacher safeguarding group (post covid group) Prevent strategy reviewed annually by WCC Prevent lead DfE Prevent FE toolkit used for annual update | <ul style="list-style-type: none"> Internal Protect group established in preparation for the new duty Internal audit of the colleges response to Prevent (and Protect) in planned in March 23 |

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| 4 | Staff training and awareness | <p>Staff are not aware of the factors that make people vulnerable to radicalisation and terrorism and are unable to recognise the signs of vulnerability and therefore are unable or unwilling to refer concerns.</p> <p>Leaders and staff feel unable or unwilling to challenge extremist narratives or exemplify British Values throughout the college.</p> <p>Staff are unclear on how to deal with or refer concerns resulting in individuals not being supported and potentially radicalisation remaining unchecked.</p> | <ul style="list-style-type: none"> British Values are promoted within the curriculum and across college Effective staff training is in place. Staff are able to raise concerns and are clear where to refer. Referrals are tracked and monitored through the welfare team database. Ofsted report 2018 recognised effective arrangements are in place. | <ul style="list-style-type: none"> Considering use of new ACT app Enhanced training delivered for facilities and IT team (signs and symbols, RWT and Security training through ACT). Train the trainer to be delivered By Regional Prevent lead to key staff |
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| No | Risk Title | Potential Risks | Existing Controls | Further Action Needed |
|----|-------------------------|---|---|---|
| 5 | Speakers and events | <p>Extremist organisations are given a platform to radicalise young people because the organisation has ineffective processes in the place for vetting speakers and events.</p> <p>Inappropriate or extremist materials are shared with learners (face to face or via weblinks) because insufficient checks are made of external speakers and materials that they promote or share.</p> | <ul style="list-style-type: none"> There is an effective Visiting Speaker policy in place Visitor management system in place | <ul style="list-style-type: none"> Internal audit of the colleges response to Prevent (and Protect) in planned in March 23 |
| 6 | Welfare & Pastoral Care | <p>The College does not provide effective welfare and pastoral support which results in learners (and staff) being unsupported and the risk of vulnerabilities being exploited.</p> | <ul style="list-style-type: none"> The Safeguarding and wellbeing team provide support for learners effectively across the sites. Vulnerable learners are tracked and monitored and referred where there are concerns. Strong relationships with local prevent specialist allows for 'checking out 'concerns effectively and receiving advice. Use of Student surveys to specifically ask learners about prevent and British vales and feeling safe. Whisper anonymous reporting tool in place Ofsted report 2018. <i>There is strong culture of safeguarding permeates through the college. The leaders and managers responsible for safeguarding carry out their roles well and keep learners and apprentices safe. Clear and appropriate measures</i> | |

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| | | | <i>are in place to ensure that leaders check the suitability of staff including volunteers, subcontractors and governors.</i> | |
| 7 | Prayer & Faith Facilities | <p>Requirements of learners (or staff) requiring faith support or the use of facilities are not met by the college resulting in individuals seeking external support of unknown suitability.</p> <p>Facilities (either prayer rooms or quiet space type facilities) provided are not effectively managed or supervised and become ungoverned spaces where radicalising, inappropriate or dangerous activities can take place.</p> | <ul style="list-style-type: none"> The college does not have dedicated /specified facilities for on site prayer however quiet spaces are made available for learners. Smoothwall monitors any learners accessing inappropriate sites or materials. | <ul style="list-style-type: none"> If no prayer facilities or other chaplaincy support are provided , processes to be put in place for signposting to other organisations |
| 8 | Work based learners | <p>The College does not have robust processes in place to protect work based students from the risks of radicalisation or views and practices contrary to British Values.</p> <p>Employers within work based settings are unaware of issues relating to Prevent the Statutory Duty and how to report concerns.</p> | <ul style="list-style-type: none"> Work based learner paperwork contains reference to Prevent. For subcontracting partners, we record yearly safeguarding lead details, Staff are aware of prevent and who to refer to in college. Student are made aware of who to contact to raise concerns Employers are made aware of the Prevent Duty Audits of partner understanding of Prevent in place Ofsted report 2108 – <i>During workplace reviews assessors develop and extend apprentices’ knowledge and awareness of a wide range of themes. These include equality and diversity, health and safety, the importance of democracy, tolerance, respect and healthy lifestyles.</i> | |
| 9 | Promoting British Values | <p>The College does not have a culture and ethos where British Values are celebrated, which leads to a culture of disrespect and intolerance and where tensions are allowed to flourish.</p> <p>Staff and learners do not understand British Values (or feel confident about) and extremist views and narratives are allowed to flourish unchallenged.</p> | <ul style="list-style-type: none"> The College values of inclusivity are prominent. Staff are aware of British values and promote them across college. Opportunities to promote British Values are taken in curriculum lessons, and tutorial sessions. Posters and promotional materials further promote the culture of respect and tolerance. Student standards are in place The colleges quality processes monitor effectiveness College improvement plan for 21.22 - Quip action 5 is rag rated green at milestone 3. Ofsted report 2018 - <i>Leaders have embedded equality of opportunity extremely well throughout the college. Learners benefit from a wide range of enrichment activities that extend their understanding of differences in the communities in which they study and live.</i> | |

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| | | | <p><i>Managers ensure that the college provides a harmonious and inclusive environment for the college's diverse community, including for the large number of vulnerable learners and those who are looked after.</i></p> | |
| 10 | Campus Security | <p>The College does not have sufficient security of its premises and learners are targeted by individuals or groups seeking to share their extremist views or endanger their personal safety.</p> <p>Charities are allowed on campus without effective checks or charitable collections are inadvertently diverted to inappropriate or unlawful causes.</p> <p>On site dangerous or hazardous substances are not kept secure and are allowed into the possession of individuals or groups seeking to use them unlawfully.</p> | <ul style="list-style-type: none"> • Health and Safety policy • Hazardous substance policy • Campus security policy • Lockdown policy • Charitable collections policy • Promotion of 'Run hide tell ' • Visitor information sheet • External letting policy • Visitor management system • Visiting speakers guidance • ID cards and access control for staff students and visitors | <ul style="list-style-type: none"> • Internal Protect Duty Strategy group established • Review lockdown/Invacuation process • DSL to attend WCC Protect Duty strategy meeting • where separate group has been created to oversee the implementation of the Protect duty, clarification of the proposed legislation is awaited, current focus is based upon: • Proportionate activity – SCan, Protect app and training of staff • Identification of publicly accessible locations PALS, which Local Authorities – own, have responsibility for or an interest in • Regular Protect meetings to address Protect issues as they become more apparent, to be kept under review in light of the proposed legislation |

Appendix 5 - Prevent Action Plan 2022/23

| Actions | Responsibility |
|---|---|
| 1. Prepare for the Protect Duty Internal Protect group established in preparation for the new duty | Julia Breakwell/Nicki Williams/Dave Guscott |
| 2. Internal audit of the colleges response to Prevent (and Protect) in planned in March 23 | Julia Breakwell |
| 3. Train the trainer model to be delivered by Regional Prevent Lead for Personal tutors and other key staff | Sal Friel |
| 4. Review lockdown/ Invacuation process | Dave Guscott / Nicki Williams/Julia Breakwell |
| 5. If no prayer facilities or other chaplaincy support processes to be put in place for signposting to other organisations | Sal Friel |
| 6. Continue with parent communication around dangers of radicalisation and promote internet safety | Lena Caple/Sal Friel |
| 7. Continue to review and reassure we have sufficient measure in place against a cyber-attack Cloud Based disaster recovery, will be fully operational March 23 SIEM (Security Information Event Management) solution to be implemented, to provide further insight/early warnings of | Dave Guscott |

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| network infiltration. This project will run over the academic year 22/23 | |
| 8. Use of THRIVE tutorial/ material for Apprenticeship induction Additional 'online safety 'question added to Arrivals Survey for FE and to the Apprentice Arrivals survey. | Sal Friel /Steph Locke |
| 9. Ensure that sub-contractors, part-time & other non-regular staff receive adequate Prevent & safeguarding training & records of completion are available if required | Tony Green / Emma Milsom/ Cherie Clements |
| 10. Retain regular links and professional updating with Regional Prevent Co-coordinator | Sal Friel/Julia Breakwell |
| 11. Revised Action Counters Terrorism (ACT) app has been relaunched. Explore the benefits and usage for HoW college staff. Enhanced training delivered for facilities and IT team (signs and symbols, RWT and Security training through ACT). | Julia Breakwell/Nicki Williams |
| 12. Regular checks/drills of processes, security systems, CCTV etc carried out & recorded | Dave Guscott |