PREVENT POLICY

Approved by: Samantha Coxon-Smith – Director
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Introduction
NLTE acknowledges and accepts its legal duty to have due regard to the risk of people being drawn into terrorism and radicalisation. It also believes that individuals being drawn into terrorism is a form of harm and accepts the obligations arising from the Prevent legislation as an important element of its general duty to protect its staff and students from all forms of harm.

NLTE must balance the requirements of Prevent with its core belief that the cultural, religious, and ethnic diversity of its staff and students should be celebrated. It must also meet its legal and moral obligation to allow and promote academic freedom and free speech which are vital elements of a successful community of students and the staff who support them.

Purpose
This policy provides the management direction to ensure that the requirements of the Counter Terrorism and Security Act 2015 (hereafter referred to as "Prevent"), specifically the duty of NLTE is to have due regard to the need to prevent people from being drawn into terrorism, is incorporated into all its relevant policies, procedures, systems, working practices and partnership arrangements.

The policy's key purpose is to assign the high-level responsibilities for ensuring the companies compliance with Prevent but will not include the detailed operational rules, processes or systems which may be necessary to meet these requirements. These are covered by other, more detailed policies arising in relevant functional areas.

As the requirements of Prevent risk a conflict with NLTE core obligations to facilitate and promote free speech as well as to protect individual privacy and academic freedom, the policy is presented as a series of "Prevent Principles" which aim to articulate how such conflicts should be dealt with and the scope for Prevent related changes to all other operational policies and procedures. The policy is therefore a combination of Prevent requirements coupled with core NLTE principles.

The policy will also assign the high-level responsibilities to the Managing Director and Safeguarding officers for ensuring that the requirements of Prevent are met, in ways which are consistent with this policy's principles, in the policies and documented procedures arising in their areas of responsibility.

Scope
This policy will apply to all NLTE staff, students, contractors, and visitors.
The activities of NLTE staff and students taking place away from permanent premises will also fall within the policy's scope if they are undertaking activities that are, or could reasonably be perceived to be, associated with NLTE, this includes students on a work placement or experience.

Definitions
Prevent - the anti-radicalisation agenda embedded in the Counter Terrorism Act and called Prevent in this policy.

Vulnerable individual – an individual shown to be, on some significant level, a risk to themselves or others, if assistance is not provided.

Academic freedom – the expectation that staff and students shall, have freedom within the law to question and test received wisdom and to put forward new ideas and controversial or unpopular opinions, without placing themselves in jeopardy of losing their jobs or privileges.

Radicalisation – Process by which an individual comes to adopt extreme political, social, or religious views, giving rise to a concern that they will act illegally.

Extremism – a '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'. The definition of extremism also includes calls for death of members of our armed forces, whether in this country or overseas.

Non-violent extremism – is defined as extremism, but without violence. Non-violent extremism can create an atmosphere in a community which can popularise the view of terrorism which terrorists can then exploit.

Terrorism – the use of threat of action, designed to influence any international government organisation or to intimidate the public. It must also for be for the advancing of political, religious, racial, or ideological cause. Planning, assisting and even collecting information on how to commit terrorist acts are all crimes under British terrorism legislation.

Channel – is part of the prevent strategy. It is a multi-agency approach to identifying and providing support to individuals at risk of being radicalised and is run in every local authority in England and Wales. Participation in Channel is voluntary at all stages.

Policy Principles
NLTE accepts its legal responsibility to have due regard to the need to prevent students and staff from being drawn into terrorism. In accepting this responsibility, it must also balance detailed Prevent requirements against its core mission to ensure that certain fundamental standards, vital to a thriving academic community, are preserved. This balance is achieved by ensuring that any changes to operational polices, guidelines, processes, systems or working practices, implemented to ensure Prevent compliance, align with the one or more of the following cores Prevent principles:

Education. Critical to supporting our students and staff so that they are less susceptible to radicalisation is to educate and support them about equality, diversity, inclusion and resilience. We do this through training, communication, positive monitoring, curriculum, having effective IT and targeted safeguarding. It is important that our approach is one of care and support.

Safeguarding. Preventing vulnerable individuals from being drawn into terrorism is a safeguarding issue and company policies and procedures in place to help safeguard staff and students should consider the Prevent requirements. By joining up the support services under the Department of Wellbeing and Welfare, awareness and escalation is more transparent, has a smaller number of leads and there is less ability for a case to fall through the gaps, in conjunction with increased opportunity to support and care for vulnerable students.

Staff awareness. All staff are expected to complete either annual online Prevent training or through an external visiting presenter. Relevant staff as determined by the Prevent Lead, should receive more detailed face-to-face Prevent training, including in ways that ensure they remain sensitive to the diversity of NLTE.

Senior accountability. The Managing Director and Safeguarding leads will maintain a risk register and will monitor the institutional risk of students and staff members being drawn into terrorism. A designated senior member of staff will be assigned lead responsibility in this policy for all Preventrelated policies and measures.

Celebrating diversity. The culturally diverse nature of the company must be actively celebrated and promoted to counter the threat of radicalisation from internal and external influences.

Multi-faith. The provision of adequate facilities to allow groups to observe their faith, coupled with effective chaplaincy arrangements, are essential to harmonious community relations and interfaith dialogue so are an important element of NLTE's Prevent approach.

Information sharing. Some internal and external information sharing will be necessary but only under appropriately controlled conditions. This does not amount to an agreement to share personal data on anything other than a need based and case by case basis. Sharing information on Prevent will be treated the same as wider safeguarding concerns. Where appropriate, any Prevent concerns will be securely transferred when a child moves school or college.

Academic freedom. The ability of students and staff to research, teach and debate any topic will not normally be fettered unless, on a case-by-case basis, a specific threat is identified or a clear Prevent requirement exists.

Free speech. Policies and procedures relating to the management of events, speakers and the display of posters and other promotional material must balance the obligation to enable free speech with the requirements of Prevent.

Social media. Social media, whilst just another medium for communication, social interaction, and debate, requires specific guidance and monitoring consistent. Social media is a vehicle by which vulnerable individuals are particularly susceptible to radicalisation.

IT Usage. NLTE will take steps to deny access to specific websites, network resources and IP addresses that provide or facilitate access to extremism materials in relation to the company's Prevent duty, this is through externally governed firewalls provided at the core of the network. Staff and students wishing to view material on external websites whose access has been disabled by targeted filtering should refer to the ICT Policy which outlines how access can be requested for authorisation. Students are supervised at all times whilst using ICT equipment.

Partnerships. NLTE will work in partnership with statutory agencies, including the Department for Education Prevent Coordinators, other Education providers, local authorities, the Police, and other bodies to assess and respond to the risk of people being drawn into terrorism.

Purpose

As the purpose of this policy is to outline NLTE's agreed principles underpinning its approach to implementing the Prevent requirements, detailed procedures will not be included.

Policies governing the behaviour of students, staff, visitors (including external speakers) and contractors, the rules relating to safeguarding, the use of IT, the approach to planning and managing events and the maintenance of free speech are in place and contain detailed procedures which all staff are expected to comply with. As these policies will be reviewed and updated to advance the principles of this policy, staff and students should consult them for instruction and guidance on specific procedures.

To help staff and students understand which departmental and functional policies should be consulted for instructions on specific procedures relating to Prevent, a summary of the full framework of policies with Prevent related requirements is appended to this policy.

Responsibility

Responsibility for NLTE's compliance with the Prevent duty rests with the company Managing Director.

Responsibility for this over-arching policy rests with the Managing Director, who is the nominated lead for NLTE's Prevent agenda. They will ensure that any changes to policies, processes and working practices will be consistent with this policy's principles. They will also ensure that all communications and training advance the principles of this policy.

Most of the operational measures necessary to ensure compliance with Prevent will be covered by specific policies.

The designated safeguarding lead has the status and authority with an education provider to commit resources to safeguarding actions and issues. They're also required to support and direct staff on safeguarding matters. The DSL will take lead responsibility for safeguarding and child protection (including Prevent).

All NLTE staff and students are responsible for conducting their day-to-day activities consistent with the principles outlined in this policy and in compliance with all other company and student policies.

Governance Requirements

Implementation / Communication Plan

A detailed communication plan reviewed along with this Policy update which aligns with the principles of this policy has been prepared and implemented.

Specific policies arising in various functional areas will be communicated and implemented according to their own approved plans.

Exceptions to this Policy

This is an over-arching policy setting out high level principles rather than detailed procedures so scope for exemptions does exist but will be expected to be applied on a case-by-case basis with appropriate justification.

Any member of staff or student seeking an exception to a requirement of a policy in the Action Plan should secure the authorisation of the Managing Director.

Any activity or process that might conflict with the principles of this policy should be authorised by the Managing Director.

Review and Update

This Policy shall be reviewed every three years.
Any interim minor changes will be made by the Managing Director.
Any interim substantial changes or full reviews will be approved by the Executive Board.

Legislative context

The Prevent requirements are included in section 26 of the Counterterrorism and SecurityAct 2015

202(2)(a) of the Education Reform Act 1988 sets out the obligation to have regard to the needto ensure academic freedom.

The Data Protection Act and Human Rights Act include relevant obligations relating toindividual privacy and the security and fair processing of personal information.
Public Interest Governance Principles section 14(7) HERA. The list (as originally determined and as revised) must include the principle that academic staff at an English higher education provider have freedom within the law, (a) to question and test received wisdom, and (b) to put forward new ideas and controversial or unpopular opinions, without placing themselves in jeopardy of losing their jobs or privileges they may have at the provider.
https://www.legislation.gov.uk/ukpga/2017/29/section/14/enacted

Stakeholder Statements

Equality This policy recognises the importance of providing for and celebrating the cultural, religious, and ethnic diversity of its staff and students. It complies with the company values, be sensitive to the diversity of the company community and to show respect to all sections of that community.

Monitoring should take place over time to ensure that NLTE is aware of any trends or patterns emerging involving groups of people and impact of this policy on those groups. The Equality, Diversity and Inclusion Lead will be an important part of this process.

Health & Safety: There are no specific health and safety concerns that relate to the policy.

The referral process for Channel

In assessing if a young person is at risk of being drawn into terrorism, a Vulnerability Assessment Framework is used by the multi-agency Channel panel. The framework involves three dimensions:
These are:
• Engagement factors, otherwise known as 'psychological hooks.' They include needs, susceptibilities, motivations, and contextual influences and together map the individual pathway into terrorism.
• Intent to cause harm. Not all those who become engaged by a group, cause or ideology go on to develop an intention to cause harm, so this dimension is considered separately.
• Capability to cause harm. Not all those who intend to cause harm are capable of doing so.

What are the signs to look out for?

As young people go through a process of testing and developing their identity, they may be particularly vulnerable to being groomed or radicalised, either face to face or online.

Very few people that have extremist ideologies become involved in violent activity. However, it is important to consider the following points contextualised to what you know about the individual.

Do they:
• Advocate extremist messages
• Access extremist literature and imagery
• Show an interest in and sympathy to extremist causes
• Glorify violence
• Refuse to listen to different points of view
• Feel persecuted
• Own additional mobile phones or devices
• Spend an increasing amount of time on the internet. This may be in secret or they may have more than one online identity.

Have they:
• Changed their friendship group or associate with people who hold extremist beliefs.
• Lost interest in previous activities
• Changed behaviours and beliefs
• Changed their appearance
• Become increasingly argumentative and abusive to others

• Become disengaged from their studies.

If you have a concern:

In the first instance, you should follow the normal safeguarding procedure and speak to your designated safeguarding lead.

https://www.leics.police.uk/advice/advice-and-information/t/prevent/prevent/

Concerns can also be raised by contacting the non-emergency police number on 101.

The Department for Education has a dedicated telephone helpline (020 7340 7264) to enable staff to raise concerns relating to extremism directly, or in non-emergency situations they can be emailed at counter.extremism@education.gov.uk

The government also provides an online reporting tool for concerns about online materials that promote terrorism or extremism. https://www.gov.uk/report-terrorism

If someone is in immediate danger or you see or hear something that may be terrorist related, call 999 or the Anti-Terrorism hotline on 0800 789 321.

Useful links:

https://educateagainsthate.com/?msclkid=2322115db1ba11ecac70062c35214edf 'Educate against hate' is a website developed and launched by the DfE and Home Office to provide schools with support and advice on extremism and radicalisation.

https://www.gov.uk/government/publications/prevent-duty-guidance?msclkid=081ec18ab1ba11ecb869440413ab3d84

https://www.gov.uk/government/collections/counter-terrorism-and-security-bill

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Radicalisation and Extremism (PREVENT) Risk Assessment

Provision: NLTE

	Yes/No	Evidence
Does NLTE have a PREVENT policy?	Yes	
Does NLTE work with outside agencies on radicalisation and extremism e.g. Channel?	Yes	We have made Prevent referrals previously
Have staff received appropriate training?	Yes	All staff have received external Prevent training in August 2024 and new staff will complete online Prevent training when they start. One member of the safeguarding team has done additional training on extreme right-wing ideology (Sept 24
Has NLTE got a trained Prevent lead?	Yes	This falls under the DSL role.
Do staff know who to discuss concerns with? (Single point of contact - SPOC)	Yes	All concerns would be raised as safeguarding concerns and Safeguarding Leads would discuss with child's provider if a Prevent referral is required
Is suitable filtering of the internet in place?	Yes	Managed by external provider.
Do children know who to talk to about their concerns?	Yes	During student inductions, they are given information about this.
Are there opportunities for children to learn about radicalisation and extremism	Yes	This forms part of our PSHE curriculum.
Have any cases been reported?	Yes	Historical
What factors make the school community potentially vulnerable to being radicalised? (e.g. EDL local base, extreme religious views promoted locally, tensions between local communities, promotion of radical websites by some pupils/parents)		Nottingham City is a multi-ethnic diverse community, made up of many nationalities. During the riots of Summer 2024, there was no local rioting.

Comment on the school's community, locality and relevant history
NLTE is made up of students from all around Nottinghamshire. Most of our students are white, working-class males and females. There is a small percentage of Asian and dual heritage students. Previous Prevent referrals have been around concerns around conspiracy theories (anti-government, covid) and mass school shootings.

Risk evaluation	**Low** **Medium** **High**	**Way Forward:** To continue to monitor safeguarding concerns and to continue raise staff awareness of local and national issues with regards to terrorism.

Date completed: 5th September 2026 Signed: S Coxon-Smith
E Gazelle

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