Extremism, Anti Radicalisation and Prevent Duty Policy

Table of Contents

1.0 Introduction

In this policy the abbreviation of EDA will be used to cover all full-time courses, and anyone involved with them at Emil Dale Academy.

*** Please note that the term "staff" in this policy covers all individuals undertaking work or services for the company regardless of their employment status.*

1.1 Purpose

EDA is under a duty to have due regard to the need to prevent people from being drawn into terrorism; schools and colleges have a duty to safeguard students and young people from radicalisation.

EDA is committed to ensuring that it remains a safe, nurturing and inclusive environment for teaching and learning. It is in this context that EDA will seek to meet its obligations under the Prevent Duty; to ensure that vulnerable individuals within the EDA community are safeguarded from being drawn into terrorism. EDA has taken a risk-based approach to put appropriate measures in place at an institutional level to ensure that the risks of its staff and students being radicalised are minimised, whilst at the same time balancing its other legal duties, including those of ensuring freedom of speech and academic freedom within the law and promoting equality and diversity across EDA. This policy forms part of that approach.

EDA is fully committed to supporting parents and legal guardians of students enrolled on the Sixth Form course in preventing students being exposed to radicalisation. All staff members are encouraged to evaluate the distinction between moderate and extremist behaviour.

1.2 Location of Policy

This policy is available to access on EDA's website.

1.3 To whom and where this policy applies

This policy applies to all students enrolled on an EDA full-time course and all staff at EDA.

1.4 Statutory & Legal Framework

EDA will act in accordance with the following legislation and guidance:

Extremism, Anti Radicalisation and Prevent Duty Policy
V06 240807

a. Counter-Terrorism and Security Act 2015
b. Prevent Duty Guidance: for England and Wales (Updated in 2024)
   https://www.gov.uk/government/publications/prevent-duty-guidance/prevent-duty-guidance-for-higher-education-institutions-in-england-and-wales
c. The Data Protection Act

2.0 Definitions

2.1 Radicalisation

Is a process by which an individual or group comes to adopt increasingly extreme political, social, or religious ideals and/or aspirations and forms of extremism leading to terrorism.

2.2 Extremism

Is the holding of extreme political or religious views, including *"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. Included in the definition of extremism are calls for the death of members of the armed forces, whether in this country or overseas."*

2.3 Propaganda

Information, especially of a biased or misleading nature, used to promote a political cause or point of view.

2.4 Terrorism

The unofficial or unauthorised use of violence and intimidation in the pursuit of political aims.

3.0 Policy

3.1 Key Principles

It is vital for EDA staff to:

a. Understand the importance of promoting British Values as part of the ethos of EDA and listen to the student about fears or concerns that they may have in light of any terrorist event;
b. Study this policy and understand the signs related to radicalisation, extremism and terrorism. In addition, they know the procedures in any disclosures or concerns about a student or member of the EDA community.

3.2 Prevent Strategy

3.2.1 Approach

EDA is committed to fostering an inclusive environment in which the principles of academic freedom and of freedom of speech underpin our educational institution. EDA is clear that in seeking to comply with the Prevent Duty:

a. No processes or mechanisms will be created for the express purpose of monitoring or reporting students.
b. Existing policies and practices will be used to ensure the safety and wellbeing of the EDA community.
c. No referral of any student or information sharing will be made to the authorities and/or Prevent without the express permission of the Principal after seeking advice. EDA will also ensure that, in these circumstances, information sharing will be consistent with the provisions of the Data Protection Act.

Prevent is one of the four elements of CONTEST, the government's counter-terrorism strategy. It aims to stop people becoming terrorists or supporting terrorism. The Home Office works with local authorities and a wide range of government departments, and community organisations to deliver the Prevent Strategy.

There are four strands to the strategy:

d. **Pursue** – to stop terrorist attacks
e. **Prevent** – to stop people becoming terrorists or supporting terrorism
f. **Protect** – to strengthen our protection against a terrorist attack
g. **Prepare** – to mitigate the impact of terrorist attacks

The Prevent Strategy:

h. Responds to the ideological challenge we face from terrorism and aspects of extremism, and the threat we face from those who promote these views.
i. Provides practical help to prevent individuals from being drawn into terrorism and ensure they are given appropriate advice and support.
j. Works with a wide range of institutions (including education, criminal justice, faith, charities, online and health) where there are risks of radicalisation that we need to deal with.
k. The strategy covers all forms of terrorism, including far right extremism and some aspects of non-violent extremism.

3.2.2 Channel

Channel is a key element of the Prevent strategy. It is a multi-agency approach which focuses on providing support at an early stage to people who are identified as being vulnerable to being drawn into terrorism. People can receive support before they begin on, or once they are on a trajectory towards participating in terrorist related activity.

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:

a. **Identify** individuals at risk of being drawn into terrorism;
b. **Assess** the nature and extent of that risk; and
c. **Develop** the most appropriate support plan for the individuals concerned.

Once a person has been identified, positive action is taken by representatives from the police, social care and education to engage the person in alternative activities. They are also given a mentor to help them discuss their views and ideas which is especially useful if they have distorted views on religion or politics. It is important to highlight that this process is there for genuine concerns about an individual and not someone who has radical ideas about a subject. Many people who begin to show signs that they are being radicalised show other characteristics such as mental health problems, drug or alcohol abuse and other symptoms which make them vulnerable. We must remember that many young people develop opinions and ideas as they become more independent, and this does not necessarily mean that they are being radicalised.

3.3 Communications

We will not permit material supporting terrorism to be displayed within EDA premises and will remove any such material if it is found. Likewise, we will seek to ensure that EDA's printed and electronic communications (including its website) do not contain or support terrorist material or material likely to encourage terrorism and will investigate immediately if any such instances are raised. It is acknowledged that there will be legitimate reasons to display materials relating to terrorism as part of legitimate teaching and learning activities and this should be declared to students and their legal parent/guardian (if the student enrolled on the Sixth Form course). Students are encouraged to contact the EDA office if they have any concerns over class content.

3.4 Referral of concerns regarding radicalisation

Any member of EDA (student or staff) may identify concerns about a student or staff member potentially being drawn into violent extremism based on information received or behaviour(s) observed. It is important that such concerns can be shared in a safe and supportive fashion to enable concerns to be investigated and an appropriate intervention to be developed, if required. It is equally important that assumptions are not made on the basis of information received and that referrals are investigated thoroughly and fairly. EDA will seek to approach such concerns. It is not your responsibility to determine whether there is a genuine risk or to challenge the individual about your concerns. What is important is to refer any concerns under this process; students are advised to arrange a meeting with their Course Leader, whereas staff members are advised to arrange a meeting with their Line Manager or relevant Head of Department.

Guidance is clear that there is no single way to identify who is likely to be vulnerable to being drawn into terrorism. To assist you in understanding the factors that may have a bearing on someone becoming vulnerable and how to identify such concerns, a non-exhaustive list of potential indicators of risk is set out at Appendix 1 of this policy. Following receipt of a referral, the next stage would be for appropriate members of senior management staff to carry out a review of the concerns raised; the purpose of such a review would be to clarify the concerns and any relevant circumstances surrounding the same. If a concern is raised about a student, the review will be led by the Principal or delegated senior manager. If a concern is raised about a member of staff, the review will be led by the Principal.

A decision will be made about the next stage based on the outcome of the review. There are three likely outcomes:

a.   No further action is required under this policy. In this case a confidential record of the case will be kept by the Principal.
b.   Internal action is required. The appropriate intervention will be determined by agreement between relevant staff members, which should be supportive in nature. As above, a confidential record will be kept.
c.   An external referral is required. Depending on the nature of the concern, there are two routes available:

       i.   Referral to the Police if there is evidence to suggest that a criminal act may be committed or has been committed: or

      ii.   Referral to Prevent.

A confidential record of all external referrals made under this policy will be kept. In reaching any decision about external referral, EDA will have regard to its obligations under its Data Protection Policy and the Data Protection Principles contained in it. Concerns will only be shared externally where there is a clear and compelling evidence of a requirement to do so.

3.5 Tackling Extremism

EDA is a tolerant and safe environment for pupils to learn and achieve. In tackling extremism, we will be vigilant in looking for signs of extremist behaviour and all staff will be aware of the procedures in place for reporting concerning behaviour.

Evidence of extremist behaviour may take the following form:

a. Disclosure by pupils or students about extremist or radicalised behaviour. This could be in the form of exposure to materials outside of EDA;
b. Use of specific terms that are associated with specific ideological views e.g. use of 'hate' language;
c. Intelligence reports from local and national agencies regarding the radicalisation of groups of people in a locality;
d. Focus on specific narratives that highlight particular extremist views;
e. Evidence of accessing online materials (including social media sites) that include extremist materials;
f. Refusal to accept views expressed by others which are counter to EDA's equality policy, unwillingness or inability to discuss their views;
g. Concerns raised by parents or legal guardians or carers or others about the changing behaviour of their child student;
h. References to an extremist narrative in a learner's work;
i. Isolating themselves from family and friends;
j. Talking as if from a scripted speech;
k. A sudden disrespectful attitude towards others or increased levels of anger;
l. Increased secretiveness, especially around internet use.

Children or young people who are at risk of radicalisation may show signs of low self-esteem or be victims of bullying or discrimination. Extremists might target them and tell them they can be part of something special, which may lead to signs of young people disengaging with family, friends, and peers. These signs don't necessarily mean a young person is being radicalised – it may be normal teenage behaviour, or a sign that something else is wrong.

3.6 Making a Judgement

When making a judgment, staff and students should ask themselves the following questions:

a. Does the person have access to extremist influences through the internet e.g. via closed network groups or through liaison with organisations or members of the community?
b. Does the person possess or actively seek extremist literature/other media likely to incite racial or religious hatred?

c. Does the person sympathize or support extremist groups or behaviour in their vocal support for terrorist attacks or in their written work?
d. Does the person's outward appearance suggest a new social, religious or political influence e.g. jewellery, tattoo, clothing?
e. Has the person been a victim of a race hate or religious crime?
f. Has the person had major disagreements with peers, family or faith groups which has led to rejection, isolation or exclusion?
g. Does the person display an irregular and distorted view of religion or politics?
h. Does the person show a strong objection to specific cultures, races or religions?
i. Is the person a foreign national awaiting a decision about deportation or immigration?
j. Is there an irregular pattern of travel by the person's family?
k. Has the person witnessed or suffered from trauma or violence in a war zone or through sectarian conflict?
l. Is there evidence of a relative or family friend having extremist views?

3.7 Referrals and Reporting

In line with EDA's safeguarding procedures, staff members are fully aware of reporting extremist behaviour. The following system for referrals is as follows:

a. Where a member of staff has any concerns about a fellow staff member or student relating to Prevent, as a matter of urgency they should refer to their Line Manager or relevant Head of Department. This, in turn, will be presented to Senior Management.
b. Where a student has any concerns about a fellow student or a staff member, as a matter of urgency they should refer to their Course Leader. This, in turn, will be presented to Senior Management.
c. All incidents will be investigated in line with current policies and evidence will be recorded and retained for EDA records.
d. Where age or course appropriate, parents/legal guardians will be contacted, and the issue will be discussed with them to investigate whether there are any mitigating home circumstances. A decision will be made at this meeting to look at any further external agency support and whether a referral should be made.
e. The DSL (Victoria Hammond) will follow up any referrals and the student or young person will be monitored for a period of time to look at whether there has been any change in attitude or behaviour. Where age or course appropriate, parents/legal guardians will be consulted during this period of time.
f. If concerns are still expressed, the DSL will contact the local Prevent Co-Ordination.

Where it is deemed that there is a risk to an individual in the context of radicalisation to extremist ideology and causes, the individual may be referred to Prevent.

EDA has a designated Prevent Single Point of Contact (SPOC) with designated responsibility for Prevent referrals / liaison and establish appropriate arrangements to ensure cover for this role. Victoria Hammond (Principal) is EDA's SPOC.

Where a member of staff has any concerns about a student relating to Prevent, as a matter of urgency they should refer to their Line Manager or relevant Head of Department. There may be some circumstances where EDA, in the course of Prevent related work, identifies someone who may already be engaged in illegal terrorist related activity. People suspected of being involved in such activity should be referred to the police by the Prevent SPOC or their delegated alternative.

3.8 Prevent-related serious incident reporting – Degree and Cert-HE ONLY

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 OfS expect a provider to report any incidents or developments which:

a. Have led to the review and substantive revision of Prevent-related policies;
b. Have caused harm to staff and students or reputational harm; and/or
c. Could be reasonably perceived as being related to Prevent.

It is for providers to determine what constitutes a serious Prevent-related incident. 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**.

The OfS does not require personal data to carry out its function, and personal information is not shared as part of this reporting.

EDA has a process in place for serious incident reporting as part of its implementation of Prevent Strategy (see 3.7).

3.9 Curriculum/British Values

EDA provides a broad and balanced curriculum, and students are encouraged to discuss different issues whilst having respect and tolerance for those with different views.

In subject areas across EDA, students learn about the importance of British Values and why they are important for a fair and equal society. These are also part of the system for electing student reps, and the decisions that students are able to make when they are asked for their opinion.

EDA adheres to the importance of British Values and encourage students to debate controversial issues.

3.10 IT Services

The statutory guidance makes clear the need for schools/colleges to ensure that students are safe from terrorist and extremist material when accessing the internet.

EDA are committed to safeguarding students and staff when using IT in accordance with our Acceptable Use (IT) Policy.

3.11 Use of External Freelancers

Vetting of all external and visiting freelancers is in line with EDA's safeguarding procedures. We would not knowingly allow any such freelancer that undermined the principles and ethos of the British Values endorsed by EDA.

3.12 Staff Training

The statutory guidance refers to the importance of Prevent awareness training to equip staff to identify children/students at risk of being drawn into terrorism and to challenge extremist ideas.

Resident staff members receive safeguarding and child protection training at least every two years in line with the relevant policies. Anti-radicalisation is also incorporated into e-safety training and updated in line with emerging online behaviours.

3.12 Sharing of Personal Information

When considering sharing personal information, EDA will take account of the following:

a. 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.
b. Consent: wherever possible the consent of the person concerned should be obtained before sharing any information about them.
c. 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, General Data Protection Regulation (GDPR) 2018 and the Human Rights Act 1998.
d. 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.

Acting in accordance with these principles regarding personal information, the Prevent SPOC may seek advice regarding a Prevent-related concern from within EDA from external sources before determining whether further action should be taken in relation to a concern about an individual or individuals.

3.13 Prevent Compliance

a. EDA fully recognises its role in helping prevent people being drawn into terrorism, which includes not just violent extremism but also non-violent extremism, which can create an atmosphere conducive to terrorism and can popularise views that terrorists exploit.
b. EDA understand that radicalisation is usually a process, not an event. During that process, behaviours as well as opinions are likely to change. These changes may be apparent to the friends, families and work colleagues of the person concerned.
c. EDA will aim to ensure that their arrangements for the implementation of the Equality Duty balance their responsibilities towards equality with their responsibilities to protect student and staff welfare under the Prevent duty.

d. The Prevent work undertaken will be closely aligned with the existing Safeguarding or equivalent procedures.

e. Any concerns about a student at risk of radicalisation should be made as a Safeguarding referral where it is appropriate to do so under EDA policies. The Prevent SPOC should be notified about such concerns as a matter of urgency.

f. The EDA Prevent SPOC will decide upon whether a referral to an external agency is appropriate. Where appropriate and legal to do so, the EDA Prevent SPOC will share information with other institutions and key partners, such as the local Prevent group.

g. EDA will ensure its Safeguarding policy is aligned with the Prevent duty and will ensure that it abides by any locally agreed inter-agency procedures relating to safeguarding.

h. The Governing Body will ensure that appropriate policies, procedures and networks are in place to enable the Prevent duty of EDA to be discharged.

3.14 Equality and Diversity

This policy is intended to ensure that no-one is treated in any way less favourably on the grounds of race, colour, national or ethnic or social origin, race, disability, gender, sexual orientation, gender reassignment, marriage & civil partnership, pregnancy & maternity, age, religion/ belief or political/ other personal beliefs.

Document Review

Version Number	Date of Issue	Review Date	Author	Changes Made/ detail
01	August 2021	August 2022	Charlotte Oliver	First issue
02	January 2022	January 2023	Eden Tinsey	Edits to language used in Section 1, Section 4
03	26th January 2022	January 2023	Eden Tinsey	Linking in Prevent Duty Policy
04	26th July 2022	July 2023	Eden Tinsey	Annual Policy Review
05	7th August 2023	July 2024	Eden Tinsey	Annual Policy Review
				3.1 (b) reads 'Study this policy and understand the signs related to radicalisation, extremism and terrorism. In addition, they know the procedures in any disclosures or concerns about a student or member of the EDA community.' Update to 3.8 to meet current OfS

List of appendices

Appendix 1

List of Potential Indicators of Risk

Extremism, Anti Radicalisation and Prevent Duty Policy
V06 240807

Appendix 2

Making a Referral to Prevent

Appendix 1

It is possible that from time-to-time staff or students at Emil Dale Academy may notice incidents occurring at the institution which cause concern. Indicators of risk and/or identification of concerns might include the following, although this list is not exhaustive:

a. Expression of views which are discriminatory against protected groups or individuals
b. Exclusion of certain groups or individuals from activities which appears to be for extremist or discriminatory reasons
c. Direct disclosure from the individual of vulnerability to being drawn into terrorism or extremism
d. Evidence of friends or family concern about vulnerability to extremism
e. Evidence of discriminatory treatment of other groups or individuals
f. Possessing, accessing or requesting extremist materials
g. Expression of extremist views and sharing of extremist materials including on social media
h. Use of extremist language
i. Threats of violence
j. Enabling non-EDA members to access EDA buildings who are a cause for concern in the context of this policy or to distribute materials promoting extremism.
k. Unattended bags or general items being left in or outside of the EDA buildings
l. Staff or students behaving in a way that raises concern, such as: organising unauthorised meetings or events, threatening other members of EDA, acting in an inappropriate way which could cause harm to themselves or others, or placing pressure on individuals to conform to a particular ideological viewpoint
m. Individuals attempting to access a secure area without the appropriate permission

Individuals may feel confused about the level of importance of what they have observed and unsure as to whether or not they need to pass on information. EDA advises that everyone with any such concern - no matter how apparently insignificant - feels able to pass on this information. Such information may be passed on in person after arranging a meeting with a Course Leader, Line Manager or Head of Department, or via email.

Appendix 2

Preparing a Prevent referral
Should EDA's SPOC make a referral, they will include the following details:

a) how or why your organisation came to be concerned
b) what happened if there was a specific event
c) the indicators that something is wrong
d) any sympathetic interest in hate crimes, extremism or terrorism - including any extremist ideology, group or cause, support for 'school shooters' or public massacres, or murders of public figures
e) any worrying use of mobile phone, internet or social media and how you found this out
f) any contact with groups or individuals that cause you concern, including who and how often, and why you're concerned
g) any expression of wanting to cause physical harm, or threats of violence, including who to, when and what was said or expressed

Extremism, Anti Radicalisation and Prevent Duty Policy
V06 240807

h) any additional need, disability or special educational need, including what they are and if they're known or suspected
i) any other safeguarding concerns about the family, peer group or environment
j) any discussions you've had with the learner, parent or carer (if under 18)
k) the parental or carer support (if known and under 18)
l) why the referral is relevant to Prevent, for example, is there a presence or possible presence, of any terrorist or terrorism-linked ideology
m) what you're worried about, what may happen if the learner's needs are not met and how this will affect them

Informing the child, young person, parents or carers
The designated safeguarding lead (DSL) should tell the child or young person that they're going to speak with their parents or carers (if under 18) and refer this to the local authority.
The reason for a referral is to:

a) make a multi-agency safeguarding assessment
b) support vulnerable people to move away from harmful activity

The DSL should tell the parents or carers that making a referral to the local authority does not mean they're accusing the child or young person of a crime.

Sharing information
Before sharing information, EDA's SPOC will try to get consent from the parents or carers (if under 18). EDA will not do this if it would place the child or young person at more risk of harm.

EDA can share information without consent if there is a good reason and if it will help to safeguard the child or young person sooner.

When seeking to share personal data regarding people susceptible to radicalisation, EDA will consider whether it is appropriate to rely on the person's consent and must ensure that the requirements of the data protection legislation are complied with.

Where it is not possible to rely on consent, it is still possible to share information if there is a lawful basis for doing so, for example, under the Data Protection Act 2018 which contains 'safeguarding of children and individuals at risk' as a processing condition that allows settings to share information, including without consent.

Further information regarding Prevent referrals can be found here - https://www.gov.uk/guidance/making-a-referral-to-prevent#the-channel-panel