

## **PREVENT Policy**

### **1. Background**

Section 21 of the Counter-Terrorism and Security Act 2015 (the Act) places a duty on certain bodies, listed in Schedule 3 of the Act, to have “due regard to the need to PREVENT people from being drawn into terrorism”. The Act states that the authorities subject to the provisions must have regard to this guidance when carrying out the duty.

‘PREVENT’ is part of the Government’s multi-strand antiterrorism strategy ‘Contest’. PREVENT is directed towards stopping people becoming terrorists or supporting terrorism. It introduces a related statutory duty which states that a range of public and other bodies, including ‘relevant higher education bodies’ (RHEBs) should, in the exercise of their functions, have ‘due regard to the need to prevent people from being drawn into terrorism’. An updated national Contest Strategy (of which PREVENT is one strand) was published in June 2018<sup>1</sup>. The statutory duty came into force for HE in September 2015. HEFCE was charged with developing and implementing a monitoring framework. Statutory guidance has been published by HM Government for HE providers on the implementation and monitoring of the PREVENT Duty.

In April 2018, the Office for Students became the monitor for PREVENT in Higher Education and published a revised approach to monitoring in September 2018.

The current threat from Terrorism and Extremism in the United Kingdom is real and severe and can involve the exploitation of vulnerable people, including children and young people. This policy is designed to provide a clear framework to structure and inform our response to safeguarding concerns for those young people who may be vulnerable to the messages of extremism. In addition, it provides details of the local inter agency process and expectations in identifying appropriate interventions based on the threshold of need and intervention model and the Channel process.

National Centre for Circus Arts is a higher education provider and a Recognised Higher Education Body on which the PREVENT duty falls. The School’s governing body has established and agreed a Risk Assessment and Action Plan relating to PREVENT. The School manages its PREVENT Duty via policies and procedures that are implemented at School-level, as set out in its Action Plan.

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[https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment\\_data/file/716907/140\\_618\\_CCS207\\_CCS0218929798-1\\_CONTEST\\_3.0\\_WEB.pdf](https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/716907/140_618_CCS207_CCS0218929798-1_CONTEST_3.0_WEB.pdf)

## PREVENT

The School's PREVENT work is intended to deal with all kinds of terrorist threats to the UK. Threats to safety and security originate from a range of extremist groups. The School recognises that the PREVENT duty extends to persons who may be either students or staff.

The School's PREVENT work depends on effective partnership within its own structures, between the School and its educational partners, national partners (BIS, OfS) and appropriate local PREVENT partners.

Key roles in relation to PREVENT within the internal structure of the School are:

### **Governance**

- School Board of Trustees (governing body): has overall responsibility for ensuring that the School discharges its PREVENT duty; presents an annual monitoring report to OfS
- School Senior Management Team has management oversight of the implementation of the NCCA PREVENT action plan and risk assessment; reviews and reports to the Board of Trustees on the discharging of the PREVENT duty.

### **Management**

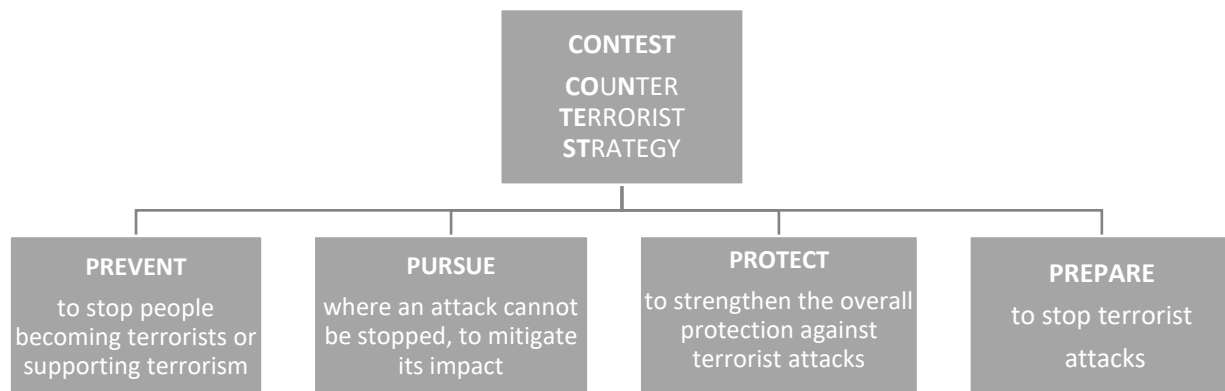
- **Board of Trustees, via the Audit Committee:**
  - inputs to the Action Plan and owns the School's actions in relation to PREVENT;
  - ensures that appropriate policies, procedures and networks are in place within the school to enable the PREVENT duty to be discharged
- **Head of Academic Administration and Student Support:** acts as PREVENT Single Point of Contact (SPOC):
  - supports the School Chief Executive to discharge the PREVENT duty;
  - has designated responsibility for Channel referrals / liaison;
  - prepares reports for and on behalf of the Board of Governors
- **School Chief Executive**
  - has management oversight for the implementation of PREVENT duty within the school
  - determines arrangements for cover in the event of the non-availability of the normal SPOC.

## 2. National Policy and Strategies

In response to this considerable challenge, the Government has developed a counterterrorism strategy, known as **CONTEST**.

The aim of **CONTEST** (an abbreviation of **COUNTER TERRORIST STRATEGY**) is to reduce the risk to the UK and its interests overseas from international terrorism to that people can go about their lives freely and with confidence.

The **CONTEST** strategy has 4 key strands of work that have a different role to play in tackling the threat from extremism:



Further information about the CONTEST strategy can be found here:

<https://www.gov.uk/government/publications/counter-terrorism-strategy-contest-2018>

The PREVENT agenda is regarded as a challenging strand of the CONTEST strategy as all the work undertaken within this area of work sits within the non-criminal space, i.e. before any criminal activity has taken place.

## 3. PREVENT and National Centre for Circus Arts

While the School acknowledges the current level of national threat at any point in time, the small size of the School means that the senior management team has good general oversight of activities within the School. This, combined with the nature of the vocational educational training delivered by the School in the performing arts, means that the judgement of the School is that the general risk of radicalisation is **manageable**.

As a Higher Education Provider, the School strongly supports the principles of freedom of speech and academic freedom within the law. While freedom of speech and academic freedom are key

principles, the School recognises that they also have a legal and moral duty of care for staff and students.

Nevertheless, the School recognises its duty of due regard under PREVENT. Through this policy and the associated actions in its action plan, including the provision of effective campaigns of awareness, training and formalising of appropriate mechanisms, the School intends to further reduce the likelihood of occurrence and also reduce the likely impact on the individuals concerned and on the organisation of any incident which might occur.

It also recognises that, on occasion, the performing arts may deal with extremist subject matter. It is committed to ensuring that, where appropriate, extremist subject matter which may be encountered by students in the course of their training, is contextualised by staff.

In particular, it considers that work to protect vulnerable individuals from violent extremism and the threat of radicalisation falls within the safeguarding arena and is no different to safeguarding individuals from a range of other forms of harm and abuse.

In this regard:

- radicalisation is usually a process and not an event, and it is possible to intervene in this to prevent vulnerable people being radicalised;
- there is a need to ensure that activities are proportionate, and focused upon people at risk;
- activity needs to address all forms of extremism. The Channel programme aims to support people who are at risk of being drawn into extremist activity. This involves several agencies working together to give individuals access to services such as health and education, specialist mentoring and diversionary activities;
- people with mental health issues or learning disabilities may be vulnerable to radicalisation, and it is important that all staff working in health and social care are aware of possible signs of radicalisation and how to refer people for further support;
- PREVENT work for the School's educational work and activities is key, but needs to be proportionate. Priorities are:
  - To ensure that all School staff and guest/visiting teaching staff know what to do if they see signs of radicalisation or have any concerns;
  - To ensure that all School staff and guest/visiting teaching staff understand how the School's manages its obligations in regard to the PREVENT Duty, which is using a Safeguarding first approach;
  - To reduce risks of exposure to extremist views in our provision and activities;
  - To collaborate with agencies to identify children and vulnerable individuals at risk of radicalisation and to protect them from harm.

Further information on the UK Government's PREVENT strategy can be found here:

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

#### **4. Definitions and vulnerability factors**

The UK Government PREVENT Strategy defines extremism as follows:

***“Extremism is 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.”***

The PREVENT Strategy defines radicalisation as follows:

***“Radicalisation refers to the process by which a person comes to support terrorism and forms of extremism leading to terrorism.”***

Radicalisation is usually a process, not an event. During this process, there may be opportunities to intervene in order to reduce the risk of the individual being attracted to extremist ideology and causes and safeguard him/her from the risk of radicalisation. It is important to be able to recognise the factors that might contribute towards the radicalisation of an individual. Indeed, some of the factors that lead an individual to becoming radicalised are no different to those that might lead individuals towards involvement with other activity such as gangs, drugs, sexual exploitation, etc.

Those involved in extremist activity come from a range of backgrounds and experiences. There is no single profile of what an extremist looks like or a 10-point plan of what might drive an individual towards becoming radicalised.

#### **5. Vulnerability factors**

A variety of factors might contribute towards an individual becoming radicalised. A table setting out some of the factors which might contribute is set out in Appendix 1 to this policy.

#### **6. Support and protocols in National Centre for Circus Arts**

As with other safeguarding issues, where a member of staff has any concerns that a person or their family may be at risk of radicalisation or involvement in terrorism, they should speak with the School's Safeguarding Lead (or a member of senior staff) and/or the PREVENT SPOC. If the

concerns about an individual are not serious enough to be escalated or where there is no evidence that the individual is vulnerable to radicalisation, the Safeguarding Lead / PREVENT SPOC may decide that they can be addressed by action within the organisation. In this case, the organisation should take the appropriate action to address any concerns, and review whether the concerns remain after this.

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

## 7. Channel Programme

Channel<sup>2</sup> is a key element of the PREVENT strategy. It is a multi-agency approach to protect people at risk from radicalisation. It is run in every local authority in England and Wales, and addresses all types of extremism. It is about early intervention to protect vulnerable children and adults who might be susceptible to being radicalised, which, if left unsupported, could lead to radicalisation. 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:

- **identify** individuals at risk of being drawn into terrorism;
- **assess** the nature and extent of that risk; and
- **develop** the most appropriate support plan for the individuals concerned.

Channel is about safeguarding persons from being drawn into extremist activity leading to violence against others. It is about early intervention to protect and divert people away from the risk they face before they are involved in any type of illegal activity.

The Channel process identifies those most at risk of radicalisation, and refers them via the local authority or police for assessment by a multi-agency panel. The panel, chaired by the local authority and made up of representatives from different safeguarding areas including health, education and the police, considers how best to safeguard them and support their vulnerability through a support package tailored to individual needs. In the event of a referral, the Channel Panel will meet to discuss the nature and extent of the potential vulnerability of the individual. This is similar to the way in which individuals at risk from involvement in crime, drugs and other social issues are supported.

Partnership involvement ensures that those at risk have access to a wide range of support ranging from mainstream services, such as health and education, through to specialist mentoring or faith

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<sup>2</sup> <https://www.gov.uk/government/case-studies/the-channel-programme>

guidance and wider diversionary activities. Each support package is monitored closely and reviewed regularly by the multi-agency panel.

Further information about the Channel programme can be found here:

[https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment\\_data/file/964567/6.6271\\_HO\\_HMG\\_Channel\\_Duty\\_Guidance\\_v14\\_Web.pdf](https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/964567/6.6271_HO_HMG_Channel_Duty_Guidance_v14_Web.pdf)

Case studies can be found at the footnote on the previous page.

## 8. PREVENT -related serious incident reporting

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 Office for Students (OfS) expects a provider to report any incidents or developments which:**

- **have led to the review and substantive revision of PREVENT -related policies**
- **have caused harm to staff and students or reputational harm**
- **could be reasonably perceived as being related to PREVENT .**

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**.

Providers are expected to report an actual or suspected PREVENT -related incident promptly. OfS guidance states that:

- providers should contact the OfS at the time when a potential serious incident is identified, and no later than five days after the incident occurring or being identified;
- In case of 'near misses', this should be reported as soon as it is deemed that a potential incident would have impacted on PREVENT duty implementation, had it progressed to its conclusion.
- The OfS does not require personal data to carry out its function, and personal information is not shared as part of this reporting.

The School has a process in place for serious incident reporting as part of its implementation of PREVENT Strategy.<sup>3</sup> Further information about PREVENT -related serious incident reporting can

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<sup>3</sup> See Implementation of the PREVENT Strategy, Section 4 'Risk Management' further on in this document (pp11-14).

be found here: <https://www.officeforstudents.org.uk/media/29154421-d3e7-4989-9e53-94413fd013f9/ofs-PREVENT-related-serious-incident-guidance.pdf>

## 9. Monitoring by the OfS

Up until 2018, RHEBs' compliance with the duty was assessed through two distinct phases of work:

- an initial assessment of detailed evidence to demonstrate that properly thought through policies and processes are in place, and
- by an ongoing annual reporting exercise consisting of a retrospective annual report covering the previous year's activity to demonstrate that those policies and procedures are being implemented and that they are being properly followed and applied. This was supplemented by risk-based Prevent Review Meeting's where significant concerns were raised.

Information about PREVENT framework for monitoring in HE can be found here:

<https://www.officeforstudents.org.uk/publications/PREVENT-duty-framework-for-monitoring-in-higher-education-in-england-2018-19-onwards/>

In para 35 of the above guidance document, the OfS states:

*Ongoing monitoring under the OfS will continue to be focused not only on whether providers have the right policies and processes in place, but primarily on evidence of active and effective implementation. The new approach will be more targeted and responsive than HEFCE's approach, with face to face PREVENT review meetings being used more systematically to supplement the desk-based exercise, and heightened engagement for those providers assessed to be at higher risk of non-compliance with the duty.*

Further information about the OfS' involvement with PREVENT duty can be found at the following link:

<https://www.officeforstudents.org.uk/advice-and-guidance/student-wellbeing-and-protection/counter-terrorism-the-PREVENT-duty/>

## 10. Referrals

Referrals to the Channel process are coordinated by the police but come from a wide range of sources, including members of the public, social services, youth offending teams and health and



education practitioners. If anyone wants to know more about Channel or have a concern about an individual and want to raise a concern, they should contact the School's PREVENT SPOC, who is the Head of Academic Administration and Student Support. Alternatively, if the PREVENT SPOC is not available, the School Chief Executive, or the Student Support Manager, may be contacted.

When a referral is received, a risk assessment of the individual being referred will be undertaken. If there is evidence of potential vulnerability to radicalisation then a multi-agency panel will meet to consider the risks identified and develop a programme of support and intervention to mitigate those risks. Consent is required from the individual being referred to share their personal information with the panel.

### **National Centre for Circus Arts' PREVENT Strategy**

The School's PREVENT Strategy is published on the School website. The School's PREVENT Strategy has 4 Strategic Aims:

- 1. Institutional Awareness and Resilience**
- 2. Institutional Compliance**
- 3. Case Management**
- 4. Risk Management**

The Strategic Aims are supported by Strategic Objectives, and the Strategy sets out the specific actions that will enable the Strategic Objectives (and thus Aims) to be met. Below is a broad summary of how the Strategy is implemented.

## **Implementation of the School's PREVENT Strategy**

### **Strategic Aim 1: Institutional Awareness and Resilience**

#### **Strategic Objective: 1.1 Staff training**

- a) National Centre for Circus Arts recognises the need to provide appropriate training for staff involved in the implementation of this duty.
- b) The awareness of staff and students regarding the rationale for PREVENT and the approach being adopted is raised through the provision of information, guidance and briefings. Staff will be advised about how to obtain support for people who may be being exploited by radicalising influences.
- c) Staff in the school who have key roles relating to vulnerable students and staff have been appropriately trained with reference to PREVENT.

- d) The School will have a PREVENT Single Point of Contact (SPOC) with designated responsibility for Channel referrals / liaison. Appropriate arrangements will be in place to ensure cover for this role.

**Strategic Objective: 1.2 External Engagement**

- e) Wherever possible, the School will work with or through external PREVENT partners to provide training for its staff.
- f) The School will ensure that relevant information is accessible to key staff.

**Strategic Aim 2: Institutional Awareness and Resilience**

**Strategic Objective: 2.1 preventing and addressing radicalisation**

- a) The School will work to balance its responsibilities under the Public Sector Equality Duty and Equality Act (2010) alongside its responsibilities under the PREVENT Duty, and will take a proportionate approach to this.
- b) The School will adopt a Safeguarding approach to its PREVENT work, which will be closely aligned with existing Safeguarding and related policies and procedures.
- c) The School will abide by any locally agreed inter-agency procedures relating to Safeguarding.
- d) The School may apply this PREVENT Policy in whole or in part to partnership activities in the course of ensuring it discharges its statutory duties.
- e) The School will encourage students to show kindness and respect to all with particular regard to the protected characteristics set out in the Equality Act (2010).
- f) Student induction will cover the PREVENT Duty and radicalisation/extremism.

## Strategic Objective: 2.2 Governance

- g) The School Board of Trustees will play an active part in ensuring the School meets its obligations with regard to the PREVENT Duty. This will include:
  - i. Ensuring appropriate policies, procedures and external networks are in place;
  - ii. The scrutiny, review and approval of this PREVENT Policy;
  - iii. Ensuring the School's Safeguarding arrangements take into account the procedures and practice of the Local Authority as part of the inter-agency Safeguarding procedures;
  - iv. Ensuring the School has clear internal reporting mechanisms for monitoring compliance with the PREVENT Duty;
  - v. Submission of an annual monitoring report to the OfS;

## Strategic Aim 3: Case Management

### Strategic Objective: 3.1 Managing concerns

- a) Any concerns about a student or staff member at potential risk of radicalisation should be raised with the School Safeguarding Lead or a member of the Senior Management Team as a Safeguarding concern in the first instance. The PREVENT SPOC should also be notified as a matter of urgency.
- b) The School will ensure that appropriate information-sharing protocols are used at a local level, and information will only be shared as necessary and on a case-by-case basis.
- c) The School PREVENT SPOC will determine whether referral to an external agency is appropriate; information will be shared with other institutions and key partners where appropriate and legal.
- d) When considering sharing personal information, the School will take account of the following:
  - i. **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*
  - ii. **Consent** - *wherever possible, the consent of the person concerned should be obtained before sharing any information about them*
  - iii. **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), the General Data Protection Regulations (2018) and the Human Rights Act (1998)*

- iv. **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*

**Strategic Aim 4: Risk Management**

**Strategic Objective: 4.1 Risk assessment and outside/visiting speakers**

- a) The School will have a robust risk assessment system in place for assessing and rating risks associated with any planned events and visiting speakers, providing evidence to suggest whether an event should proceed, be cancelled, or whether mitigating action is required. This will be supported by appropriate policies and procedures.
- b) The School will manage potential associated risks of planned events and visiting speakers by:
  - i. Having risk assessment systems and approval processes in place;
  - ii. Where relevant and appropriate, vetting materials and content prior to an event;
  - iii. Having supervision in place during events;
  - iv. Empowering supervisory staff to intervene if necessary;

**Strategic Objective: 4.2 Online safety and access to terrorism/extremist related materials**

- c) The School will implement appropriate steps with regard to online and e-Safety in order to discharge the PREVENT Duty. This may include filtering or other restrictions of access to online content on School IT systems and/or appropriate monitoring of the IT use of staff and/or students
- d) The School will implement policies consistent with the PREVENT Duty to manage instances where online or other extremist or terrorist-related materials may be accessed by staff or students for teaching, learning, research or other purposes which are relevant to the work of the School

**Strategic Objective: 4.3 Environment**

- e) Prayer and Faith Facilities: The School will ensure that a suitable space for prayer or quiet reflection can be made available to students as required. The School will ensure that there are clear signposts to widely available policies and procedures.

## Appendix 1: Factors which might contribute to an individual becoming radicalised

Below are some of the factors that might contribute towards an individual becoming radicalised; on the following page there is a link to Channel.

The list below is not an exhaustive list and the presence of any of these factors does not necessarily mean that an individual will be involved in extremist activity. However, a combination of many of these factors may increase the vulnerability to extremist activity.

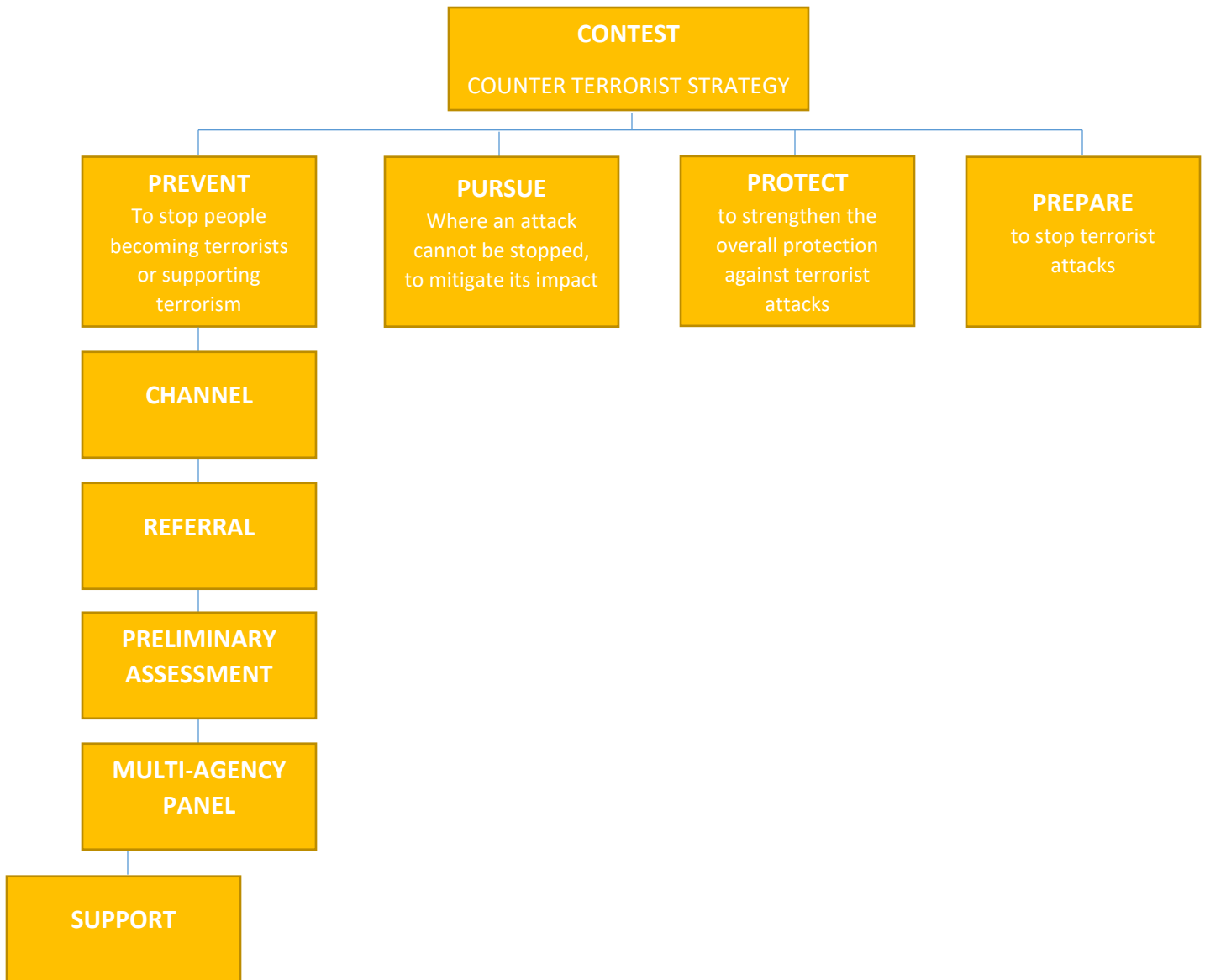
<b>Identity crisis</b>	Distance from cultural/religious heritage and uncomfortable with their place in the society around them.
<b>Personal crisis</b>	Family tensions; sense of isolation; adolescence; low self-esteem; disassociating from existing friendship group and becoming involved with a new and different group of friends; searching for answers to questions about identity, faith and belonging.
<b>Personal circumstances</b>	Migration; local community tensions; events affecting country or region of origin; alienation from UK values; having a sense of grievance that is triggered by personal experience of racism or discrimination or aspects of Government policy.
<b>Unmet aspirations</b>	Perceptions of injustice; feeling of failure; rejection of civic life
<b>Criminality</b>	Experiences of imprisonment; poor resettlement/reintegration, previous involvement with criminal groups.

## **Channel Training**

The link to an e-learning module below provides further information on the Channel process and its purpose and will assist in identifying factors that might make children and young people vulnerable to radicalisation. The module takes 25 minutes to complete and describes your responsibilities and role in relation to the Channel process. A certificate of achievement can be printed once the module has been completed.

[https://www.elearning.PREVENT.homeoffice.gov.uk/channel\\_awareness/01-welcome.html](https://www.elearning.PREVENT.homeoffice.gov.uk/channel_awareness/01-welcome.html)

## Appendix 2: CONTEST Counter-Terrorist Strategy Flow Chart



### Appendix 2: Additional Links, Further Sources and Useful Information

#### UK Government PREVENT Strategy 2011:

[https://www.gov.uk/government/uploads/system/uploads/attachment\\_data/file/97976/PREVENT-strategy-review.pdf](https://www.gov.uk/government/uploads/system/uploads/attachment_data/file/97976/PREVENT-strategy-review.pdf)

#### UK Government PREVENT Duty guidance 2015:

<https://www.gov.uk/government/publications/PREVENT-duty-guidance/revised-PREVENT-duty-guidance-for-england-and-wales>

**UK Government PREVENT Duty Guidance for Higher Education Institutions in England and Wales:**

<https://www.gov.uk/government/publications/PREVENT-duty-guidance/PREVENT-duty-guidance-for-higher-education-institutions-in-england-and-wales>

**Counter-terrorism strategy (CONTEST) 2018**

[https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment\\_data/file/716907/140618\\_CCS207\\_CCS0218929798-1\\_CONTEST\\_3.0\\_WEB.pdf](https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/716907/140618_CCS207_CCS0218929798-1_CONTEST_3.0_WEB.pdf)

**Statutory Guidance relevant to Higher Education and Monitoring of Higher Education**

<https://www.officeforstudents.org.uk/advice-and-guidance/regulation/counter-terrorism-the-PREVENT-duty/>

**Channel: Protecting vulnerable people from being drawn into terrorism**

[https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment\\_data/file/964567/6.6271\\_HO\\_HMG\\_Channel\\_Duty\\_Guidance\\_v14\\_Web.pdf](https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/964567/6.6271_HO_HMG_Channel_Duty_Guidance_v14_Web.pdf)

**UUK Guidance on External Speakers in Higher Education:**

<http://www.universitiesuk.ac.uk/policy-and-analysis/reports/Pages/external-speakers-in-higher-education-institutions.aspx>

**Safer Campus Communities – resources for Higher Education providers:**

<http://www.safecampuscommunities.ac.uk/resources>