

PREVENT STRATEGY

The School's PREVENT work depends on effective partnership within its own structures, between the School and its educational partners, national partners (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 CEO has management oversight of the implementation of the PREVENT action plan and risk assessment and 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
- **The CEO:** acts as PREVENT Single Point of Contact (SPOC) by:
 - implementing and discharging the PREVENT duty;
 - being responsible for Channel referrals / liaison;
 - preparing reports for and on behalf of the Board of Governors
 - determines arrangements for cover in the event of the non-availability of the normal SPOC.

NCCA's PREVENT Strategy has 4 Strategic Aims:

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

No.	Strategic Aim	Strategic Objectives	How the objectives will be met	Responsibility for ensuring objectives are met	Related Information / Policies / Guidance / Documentation
1.	Institutional Awareness and Resilience Sufficient and satisfactory institutional awareness to ensure that the School can appropriately implement the PREVENT Duty. This encompasses:	1.1 Staff Training	1.1.1. School staff who have key roles relating to vulnerable students and staff are appropriately trained with reference to PREVENT	PREVENT SPOC	The awareness of staff and students regarding the rationale for PREVENT and the approach being adopted is being raised through the provision of guidance and briefings. Staff will be advised about how to obtain support for people who may be being exploited by radicalising influences. - Prevent Policy - School Safeguarding Policy - Student Handbooks
			1.1.2. Guest teachers will be furnished with information about who to contact if they have concerns in relation to PREVENT	PREVENT SPOC	
			1.1.3. The School will establish appropriate arrangements for cover for the SPOC in the event they are unavailable	PREVENT SPOC & Chief Executive	
			1.1.4. School Board of Trustees will receive training related to the PREVENT Duty and the School's PREVENT Strategy, and regular updates are provided to the Board	PREVENT SPOC	
			1.1.5. The School will have a PREVENT Single Point of Contact (SPOC) with designated responsibility for Channel referrals / liaison	Chief Executive	
			1.1.5 The School recognises that the PREVENT duty extends also to staff and will ensure that policies and procedures relating to vulnerable staff take appropriate account of the PREVENT duty	PREVENT SPOC & Chief Executive	

		1.2 External Engagement	1.2.5 Wherever possible, the School will work with or through external PREVENT partners to provide training for its staff	PREVENT SPOC	
			1.2.6 The School will ensure that information to contact appropriate external bodies (eg Channel) is accessible to designated staff	PREVENT SPOC	
2.	Institutional Compliance Appropriate mechanisms and protocols to ensure the School can appropriately implement the PREVENT Duty. This encompasses:	2.1 Preventing and addressing radicalisation	2.1.1 The School will aim to ensure that our arrangements for the Equality Duty balance our responsibilities towards equality with our responsibilities to protect staff and student welfare under the PREVENT Duty	PREVENT SPOC	The School fully recognises its role in helping PREVENT people being drawn into terrorism, including both violent/non-violent extremism. Non-violent extremism can create an atmosphere conducive to terrorism and can popularise views that terrorists exploit. The School understands that radicalisation is usually a process, not an event. During that process, behaviours as well as opinions are likely to change. Such changes may be apparent to people who live or work with the person concerned. Key documents: School PREVENT Policy, which
			2.1.2 The School's PREVENT work undertaken will be closely aligned with our existing Safeguarding and/or equivalent policies and procedures	PREVENT SPOC, Safeguarding Committee	
			2.1.3 The School will ensure that it abides by any locally agreed inter-agency procedures relating to Safeguarding	PREVENT SPOC & Safeguarding Committee	
			2.1.4 With regard to partnership activities, the School shall determine the applicability of this Strategy and the aligned School PREVENT Policy to the activity concerned. The School may apply the PREVENT policy in whole or in part to partnership activities in order to ensure that the PREVENT duty of the School is discharged	PREVENT SPOC, Strand Managers, Head of Higher Education Delivery & Chief Executive	
			2.1.5 The School will encourage students to respect others with particular regard to the protected characteristics set out in the Equality Act 2010, along with an annual talk on PREVENT Duty and radicalisation/extremism	All School staff; PREVENT SPOC	
		2.2 Governance	2.2.1 The School Board of Trustees will ensure that appropriate policies, procedures and external networks are in place to enable the PREVENT duty of the School to	Board of Trustees	

			be discharged and that the discharge of its duty is set out in the School PREVENT Policy		has links to statutory guidance and is reviewed annually - NCCA Student Code of Conduct - NCCA Inclusivity Policy and Protocols
			2.2.2 The School Board of Trustees will ensure that School safeguarding arrangements take into account the procedures and practice of the Local Authority as part of the inter-agency Safeguarding procedures set up by the Local Safeguarding Children Board (LSCB)	Board of Trustees	
			2.2.3 The School will have clear internal reporting mechanisms for monitoring compliance with the PREVENT Duty	Board of Trustees	
			2.2.4 The School Board of Trustees shall submit an annual monitoring report to OfS.	Board of Trustees	
			2.2.5 The School Board of Trustees has a Safeguarding Link Governor aware of this Strategy and allied Policy	Board of Trustees	
3.	Case Management	3.1 Managing concerns	3.1.1 Any concerns about a student or staff member at potential risk of radicalisation should be made as a Safeguarding referral, in accordance with the School's Safeguarding policies and procedures. This means that the School's Safeguarding Lead should be notified of the concerns. The School PREVENT SPOC should also be notified about such concerns as a matter of urgency.	All School staff	Key documents: - PREVENT Policy - Safeguarding Policy
		3.2 Disclosures and Referrals relating to staff and students	3.2.1 Where a member of staff has received a disclosure about a student or member of staff relating to PREVENT, as a matter of urgency they should refer the matter to the School's PREVENT SPOC, or in their absence, a member of the Safeguarding Committee who will determine whether referral to an external agency is appropriate.	All School staff	

	3.3 Referring cases	3.3.1	Information sharing must be assessed on a case-by case basis and is governed by legislation. To ensure the rights of individuals are fully protected, the School will ensure that appropriate information-sharing protocols are used at a local level.	School Safeguarding Committee	
		3.3.2	The School PREVENT SPOC will decide upon whether a referral to an external agency is appropriate. Where appropriate and legal to do so, the school PREVENT SPOC will share information with other institutions and key partners, such as the local PREVENT group.	PREVENT SPOC	The PREVENT programme must not involve any covert activity against people or communities. However, specified authorities may need to share personal information to ensure, for example, that a person at risk of radicalisation is given appropriate support (for example on the Channel programme).
	3.4 Information sharing	When considering sharing personal information, the School will take account of the following:		All School staff; Board of Trustees	Acting in accordance with these principles regarding personal information, the School PREVENT SPOC may seek advice regarding a PREVENT-related concern from within the school, or from sources external to the School before determining whether further action should be taken in relation to a
		3.4.1	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		
		3.4.2	Consent: wherever possible, the consent of the person concerned should be obtained before sharing any information about them		
		3.4.3	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)		
		3.4.4	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		concern about an individual or individuals.
			3.4.5 There may be some circumstances where the School, 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 School PREVENT SPOC / the delegated alternative	PREVENT SPOC	
			3.4.6 Where appropriate and legal to do so, NCCA will always share information with other institutions and key partners, such as the local PREVENT group	PREVENT SPOC & Chief Executive	
		3.5 Reporting of Serious Incidents	3.5.1 Any potential PREVENT-related serious incident should be reported to the School PREVENT SPOC as soon as they occur or are identified, to allow for gathering any additional information if necessary. The PREVENT SPOC, in consultation with the School Chief Executive, (as Accountable Officer to the Office for Students), will determine whether there is a need to: • Report the matter to Channel or other external agencies • formally report a matter to the OfS as a serious incident	All School staff; PREVENT SPOC & Chief Executive	Key documents: • Safeguarding Policy: Disclosure form • Support Through Studies Cause for Concern Form
			3.5.2 Where a referral to Channel is made, the Chief Executive, will be notified and kept informed	PREVENT SPOC	
			3.5.3 If there are serious concerns about a person under 18 years of age, referrals should be made to the Local Authority via the Hackney Council Website on 0208 356 5550	PREVENT SPOC in consultation with Chief Executive and one or more members of the	

				School Safeguarding Committee		
4.	Risk Management	4.1 Risk assessment and outside / visiting speakers	4.1.1	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.	PREVENT SPOC	The School takes its responsibility seriously, where necessary and in line with its Code of Practice on Freedom of Speech, to exclude those promoting extremist views that support or are conducive to terrorism. Key documents: Code of Practice on Freedom of Speech (which covers the School's policy on External Groups and Speakers)
			4.1.2	The School will have a policy on the use of its premises by external groups and speakers	PREVENT SPOC & Chief Operating Officer	
			4.1.3	All events and speakers are assessed and approved by the School's Chief Executive	Chief Executive	
			4.1.4	The School may ask to see the content of a guest speaker/artist's materials prior to the event, including an outline of the topics to be covered and sight of any presentations / footage to be broadcast / leaflets or other print media etc	School Senior Management Team	
			4.1.5	All visiting speakers/artists who come to the School will be supervised by a member of the School staff, who is expected to interject or stop an event if they feel that the speaker is promoting extremist views or inequality in any form. Guest artists engaged by the School will be appropriately supervised in line with the School's principles.	All School staff, as applicable	

			4.1.6 Staff are required to book events with sufficient notice and following the appropriate School protocols to allow the CEO to undertake checks	All School staff	
		4.2 Online safety and access to terrorism/extremist related materials	4.2.1 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	PREVENT SPOC, Facilities Manager / IT support company	
			4.2.2 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	PREVENT SPOC	
		4.3 Environment	4.3.1 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.	PREVENT SPOC	

LIST OF CONTACTS:

PREVENT Specific Point of Contact (SPOC) – Dan Cowdrill – dan@nationalcircus.org.uk

Student Support Manager – Antigone Exton-White – antigone@nationalcircus.org.uk

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