



# CSR Prevent Policy

Board sign off:

Date: 28/03/24

Next review due - December 24 by TJ

## PREVENT POLICY

The government Counter-terrorism and Security Act 2015, places a duty upon all education providers to have regard to the need to prevent people from being drawn into terrorism. This Prevent Duty forms part of the wider government's CONTEST counter terrorism strategy:

- Prevent terrorism – stop people becoming terrorists
- Pursue terrorism – disrupt and stop terror attacks
- Protect against terrorism – strengthen UK protection
- Prepare to deal with terrorism – mitigate impact of attacks that can't be stopped.

The current threat from Terrorism and Extremism in the United Kingdom is SUBSTANTIAL and can involve the exploitation of vulnerable people, including children and young people.

Radicalisation is defined as the process by which people come to support terrorism and extremism and, in some cases, to then participate in terrorist groups.

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. All staff have an awareness of the PREVENT duty and the various forms radicalisation takes as well as being able to recognise signs and indicators of concern and respond appropriately.

### Equality, Diversity and Community Cohesion

CSR aim to guide our learners to understand others, to promote common values and to value diversity, promote awareness of human rights, uphold and defend them.

### National Guidance and Strategies

Early intervention is at the heart of PREVENT in diverting people away from being drawn into terrorist activity. PREVENT happens before any criminal activity takes place. It is about recognising, supporting and protecting people who might be susceptible to radicalisation.

CSR Scientific Training acknowledges and accepts its legal duty to have due regard to the risk of people being drawn into terrorism. 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 learners from all forms of harm.

CSR Scientific Training must balance the requirements of Prevent with its core belief that the cultural religious and ethnic diversity of its staff and learners 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 learners, scholars 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”) and the Prevent duty guidance: England and Wales (2023), specifically the duty of CSR Scientific Training 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.

As the requirements of Prevent risk a conflict with CSR Scientific Training’s 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 CSR Scientific Training standards.

## Scope

This policy will apply to all CSR Scientific Training community: staff, learners and visitors.

The activities of CSR Scientific Training staff and learners taking place away from CSR Scientific Training sites will also fall within the policy’s scope if they are undertaking activities that are, or perceived to be, associated with CSR Scientific Training.

## Equality Analysis

This policy recognises the importance of providing for and celebrating the cultural, religious and ethnic diversity of its staff and learners. It requires all staff, learners and visitors to respect CSR Scientific Training’s values, be sensitive to the diversity of CSR Scientific Training community and to show respect to all sections of that community.

## 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 learners 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

## Legislative context

The Prevent requirements are included in section 26 of the Counter-Terrorism and Security Act 2015 and The Counter-Terrorism and Security Act 2015 (Monitoring of Further Education Bodies) (England) Regulations 2016, Prevent duty guidance: England and Wales (2023). Education Act 2011 includes obligations relating to free speech. The Data Protection Act 2018, General Data Protection Regulation (GDPR) and Human Rights Act 1998 include relevant obligations relating to individual privacy and the security and fair processing of personal information.

## Online Safety

The use of technology has become a significant component of many safeguarding issues. Child sexual exploitation; radicalisation; sexual predation: technology often provides the platform that facilitates harm. The breadth of issues classified within online safety is considerable, but can be categorised into three areas of risk:

- content: being exposed to illegal, inappropriate or harmful material; for example, pornography, fake news, racist or radical and extremist views;
- contact: being subjected to harmful online interaction with other users; for example, commercial advertising as well as adults posing as children or young adults; and
- conduct: personal online behaviour that increases the likelihood of, or causes, harm; for example, making, sending and receiving explicit images, or online grooming

## Policy

### Principles

CSR Scientific Training accepts its legal responsibility to have due regard to the need to prevent people 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 apprenticeship community, are preserved. This balance is achieved by ensuring that any changes to operational policies, guidelines, processes, systems or working practices, implemented to ensure Prevent compliance, align with the one or more of the following principles:

1. Safeguarding. Preventing vulnerable individuals from being drawn into terrorism is a safeguarding issue and CSR Scientific Training policies and procedures in place to help safeguard staff and learners should take into account the Prevent requirements.
2. Staff awareness. Staff should be made aware of the general requirements of Prevent but in ways that ensure they remain sensitive to the cultural, religious and ethnic diversity of CSR Scientific Training community. Specific attention will be made to the additional vulnerability of learners aged 16 to 18, those with additional learning needs and those with ALS requirements.
3. Senior accountability. The senior Leaders will maintain a risk assessment and will monitor the institutional risk of CSR Scientific Training learners and staff being drawn into terrorism. A designated senior member of staff will be assigned lead responsibility in this policy for all Prevent related policies and measures.
4. Multi-faith. The provision of adequate time to allow groups to observe their faith, is essential to harmonious community relations and inter-faith dialogue so is an important element of CSR Scientific Training's Prevent approach.
5. 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 needs-based and case by case basis.
6. Academic freedom. The ability of learners 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
7. 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
8. Website Filtering. CSR Scientific Training sites will block access to specific websites, network resources and IP addresses that provide or facilitate access to extremism materials.
9. Partnerships. CSR Scientific Training should work in partnership with statutory agencies, other FEIs, local authorities and other bodies to assess and respond to the risk of people being drawn into terrorism. Any requirements to refer a learner to Prevent will also be notified to the ESFA by calling them on 08000150600 or emailing [helpdesk@manage-apprenticeships.service.gov.uk](mailto:helpdesk@manage-apprenticeships.service.gov.uk)
10. Speakers. A nominated representative of CSR's Safeguarding Team will be responsible for vetting all external speakers in accordance with the above.

11. Safer recruitment. Senior leaders and the HR team will follow all guidance as set out in KCSIE regarding Safer Recruitment to include any searches for evidence of potential associations or terrorist ideologies during pre-employment checks.

## Procedures

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

## Governance Requirements

### Responsibility

Responsibility for CSR Scientific Training's compliance with the Prevent duty rests with the Board, senior managers and directors. Responsibility for this over-arching policy rests with the nominated lead for CSR Scientific Training's Prevent agenda, Trudy Jukes.

The Designated Safeguarding Lead is assigned responsibility for managing the first line response to any terrorism or radicalisation threat and for any decision to escalate via police forces. All CSR Scientific Training staff and learners are responsible for conducting their day to day CSR Scientific Training activities consistent with the principles outlined in this policy and in compliance with all other CSR Scientific Training policies.

Any identified concerns, as the result of observed behaviour or reports of conversations to suggest that a person supports terrorism and/or extremism, must be reported to the nominated lead immediately.

It should be recognised that concerns of this nature, in relation to violent extremism, are most likely to require a police investigation (as part of the Channel process).

## Channel referral process

Channel is a programme which focuses on providing support at an early stage to people who are identified as being vulnerable to being drawn into terrorism. The programme uses a multi-agency approach to protect vulnerable people by:

- identifying individuals at risk
- assessing the nature and extent of that risk
- developing the most appropriate support plan for the individuals concerned

Sections 36 to 41 of the Counter-Terrorism and Security Act 2015 set out the duty on local authorities and partners of local panels to provide support for people vulnerable to being drawn into any form of terrorism.

This guidance has been issued under sections 36(7) and 38(6) of the act to support panel members and partners of local panels.

The document:

- provides guidance for Channel panels

- provides guidance for panel partners on Channel delivery (that is, those authorities listed in Schedule 7 to the Counter-Terrorism and Security Act 2015 who are required to co-operate with Channel panels and the police in carrying out their functions in Chapter 2 of Part 5 of the Counter-Terrorism and Security Act 2015)
- explains why people may be vulnerable to being drawn into terrorism and describes signs to look for
- provides guidance on the support that can be provided to safeguard those at risk of being drawn into terrorism

Channel may be appropriate for anyone who is vulnerable to being drawn into any form of terrorism. Channel is about ensuring that vulnerable children and adults of any faith, ethnicity or background receive support before their vulnerabilities are exploited by those that would want them to embrace terrorism, and before they become involved in criminal terrorist activity.

#### Channel Panel

The Local Authority Chair and the police will be present at each panel alongside other members, as determined by the panel (section 37(4)). The other members might include children and adults social care services and the NHS. Each local authority panel can determine other members as appropriate which will be dependent on the referrals to be discussed. If the panel chooses one of the Schedule 7 partners to be a member, there is an expectation that the partner will agree to sit on the panel if requested to do so.

Depending on the nature of the referral, the panel may also include, but not limited to, representatives from the following groups:

- NHS;
- Social workers;
- Schools, further education colleges and universities;
- Youth offending services;
- Directors of children's and adult's services;
- Chairs of Local Safeguarding Children Boards and Safeguarding Adult Boards;
- Local authority safeguarding managers (adult and/or children);
- Local authority Troubled Families Teams;
- Home Office Immigration (Immigration Enforcement, UK Visas & Immigration);
- Border Force;
- Housing;
- Prisons; and
- Probation.

## Related Documents

Also see:

- CSR's Safeguarding Policy
- CSR's e-Safety Policy
- CSR's Prevent Risk Assessment
- CSR's Safeguarding and Prevent Action Plan
- Prevent Duty Self Assessment tool for FE providers