

Introduction and scope

Section 26(1) of the Counter Terrorism and Security Act 2015 (the ACT) imposes a duty on specified bodies to have “due regard to the need to prevent people from being drawn into terrorism”. Further education institutions, specified under schedule 6 to the Act fall into categories, of which GTG is an eligible (ESFA) funded independent training provider. The policy applies to all GTG employees, learners, and stakeholders. As part of the government’s commitment to support providers, and their staff across the FE sector, Prevent duty guidance was published. The guidance makes clear the important role of FE providers in stopping extremists from radicalising learners and in supporting vulnerable learners at greater risk of extremist influences. It is also a condition of funding that all FE providers comply with relevant legislation and statutory responsibilities relative to the delivery of education and safeguarding of learners. GTG’s policy enacts our duty, under 4 key themes;

1. Risk assessment and responsibilities - the measurement of vulnerabilities and controls
2. Working in partnership - utilising external, expert agencies to support our aim
3. Staff training
4. Policies relative to the enabling of this duty.

GTG must take steps to promote and safeguard the welfare of all individuals engaged in any activity, Prevent is aligned with our safeguarding practice. There are robust safeguarding arrangements in place, which are routinely reviewed, to ensure that employees, learners, and stakeholders are in a safe learning and working environment. GTG are also committed to the promotion of an inclusive learning environment, which does not allow any individual or group of individuals to be marginalised, stigmatised, or excluded. GTG has a responsibility to promote values of openness and respect and to facilitate free debate which is characteristic of being a British citizen. In accordance with our standard practice, this policy will be updated annually, or with emerging government guidance, or when the necessity arises.

Aim

The aim of the GTG Prevent Policy is to ensure that we are able to monitor, manage and deal effectively with the threat posed by any individual or group of individuals engaging in violent, or non-violent extremism in the name of ideology or belief.

- To develop employees, learners and other stakeholder knowledge of PREVENT
- To ensure that employees and learners are aware of their roles and responsibilities in preventing violent and non-violent extremism and radicalisation
- To provide scrutiny of safeguarding practice, including the arrangements to enact this policy
- To promote and reinforce shared values, to create space for free and open debate, to manage and support freedom of speech and learner voice
- To routinely assess current practice and apply all measures necessary so that the risk of exposure to extremism, and of becoming radicalized is controlled.

Purpose

The government’s Prevent Strategy was published in 2011 and forms part of an overall Counter Terrorism Strategy known as CONTEST. Prevent is the key part of the Contest strategy which aims to stop people from becoming terrorists, or supporting terrorism.

The 2011 Prevent Strategy has three objectives in CONTEST:

- Respond to the ideological challenge of terrorism and the threat we face from those that promote it
- Prevent people from being drawn into terrorism and ensure that they are given appropriate support
- Work with sectors and institutions where there are risks of radicalisation that we need to address

The government’s Prevent Strategy was explicitly changed in 2011 to deal with all forms of terrorism and target not only violent extremism but non-violent extremism, which can create an atmosphere conducive to terrorism and can popularise the views that terrorists exploit. 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 and it is about recognising, supporting, and protecting individuals who might be susceptible to radicalisation.

The United Kingdom currently faces a range of terrorist threats. All terrorist groups who pose a threat to the UK seek to radicalise and recruit people to their cause. A system of threat levels has been created which represents the likelihood of an attack in the near future, the 5 levels of threat are set by the Joint Terrorism Analysis Centre and the Security Service (MI5):

- Low - an attack is highly unlikely
- Moderate - an attack is possible but not likely
- Substantial - an attack is likely
- Severe - an attack is highly likely
- Critical - an attack is highly likely in the near future

Risk assessment and responsibilities

The Operations Director, Billy Hammond, holds overall responsibility for ensuring that this policy, the PREVENT risk assessment, and other related policies are implemented, and routinely evaluated. The Operations Director is supported by multiple designated safeguarding leads, safeguarding officers, governors, leaders, and managers. This network of support allows GTG to disburse its duty, from the highest level, ensuring that the policy, and our overarching duty in action, is effective.

GTG commits to strong leadership by:

- Undertaking governance relevant to this policy
- Utilising guidance to undertake a robust risk assessment of our duty
- Continually improving practice to safeguard, and recognising progress through the quality improvement plan
- Provide an ethos that upholds the organisational values and promotes respect, equality, diversity, and inclusion
- Providing clear guidance and support to report concerns around extremism or radicalisation, via referrals
- Removing any literature displayed around the organisation that could cause offense or promote extremist views
- Supporting the development and understanding of issues around extremism and radicalisation, by providing access to training
- Ensuring that staff identified via job/person spec will be subject to a PVG, or enhanced DBS check, confirming their current status at employment, and tri-annually thereafter
- To build relationships with external specialists, supporting the disbursement of our duty.

GTG commits to managing concerns of radicalisation and extremism:

- Understand the nature of the threat from extremism and how this may impact directly, or indirectly the organisation
- Understand and manage potential risks within the organisation, from all influences including the display of extremist materials, the hiring of external premises, and the hire of GTG premises to others out-side the organisation
- Respond appropriately to events in local, national, or international news, that may impact the organisation
- Ensure measures are in place to minimise the potential for acts of terrorism, or extremism within the organisation
- Ensure plans are in place to respond appropriately to a threat, or incident within the organisation
- Adopt effective IT security and communicate this to all staff and learners.

GTG commits to building resilience of learners, undermining extremist ideology and supporting learner voice, through:

- Embedding organisational values, British values, equality, diversity and inclusion within curricula
- Promoting community cohesion, and respect for others
- Promoting wider skill development, such as social emotional wellbeing
- Developing curricula which recognises local/national needs and challenges extremism
- Teaching and learning strategies that explore controversial issues in a way that promotes freedom of speech
- Use of external organisations to support learners' understanding of the Prevent duty, and what they think of it
- Effective support services which provide clear information, advice, and guidance on preventing learners from being drawn into extremism and radicalisation
- Literature written in clear and simple language which promotes equality, diversity, and inclusion and undermines extremist ideology

- Dedicated support for at-risk learners, through the safeguarding and welfare practice

Working Partnerships

GTG leaders, managers and employees will build and maintain key partnerships to enable the disbursement of our duty. These partnerships should include; Police, and specific Counter-Terrorism Units, local safeguarding board(s) and the local PREVENT coordinator. This enables a network of support to be cultivated and for appropriate information exchange to take place. GTG must also maintain a register of safeguarding boards across our delivery regions.

Staff Training

- Training and briefings will be delivered to ensure that the organisation has up to date information. This will be delivered by the Safeguarding lead, or a variety of specialist partners e.g. the local PREVENT coordinator
- Staff inducted to the organisation will receive specific PREVENT and safeguarding training
- Practitioners and other relevant staff will undertake the level 2 Award in understanding Prevent and Safeguarding Strategies, understanding the factors that make people vulnerable to being drawn into terrorism, how to effectively challenge extremist ideas that could legitimise terrorist activity and how to make referrals via the Safeguarding team, and subsequently through the Channel programme.
- Leaders, managers and other relevant staff will undertake the NSPCC Safer Staff Recruitment training, as a rolling programme
- Governors, leaders and managers will undertake appropriate training relevant to the enactment of our duty, and to exemplify British values through leadership and management. This training will also reflect how at corporate level there are procedures for information sharing, by way of agreement as is necessary.

Access & monitoring of IT systems

In order to safeguard individuals from accessing extremist materials while using company equipment, GTG will ensure:

- There is the ability to log and retain records of all electronic communication (web browsing, email exchanges etc.) by users on the organisation network
- Appropriate staff are able to monitor any aspects of its telephone, mobile phones and computing facilities that are made available to staff, learners and visitors
- Only approved software will be provided by the organisation for use
- All unauthorised software will be removed and appropriate action taken
- All unusual or suspicious events, and any breaches of security, are reported via the safeguarding reporting channels for further investigation.

Key Policies and documents relative to the enactment of our duty

This policy should be read in conjunction with the following documents:

- PREVENT risk assessment
- Safeguarding and Safer recruitment Policies
- Health & Safety Policy
- Behaviour and Conduct Policy
- Data protection and IT acceptable Use Policies
- Whistleblowing Policy
- Freedom of speech and Code of Practice
- Guest speaker Policy
- Complaints, Appeals and Compliments Policy
- Equality and Diversity Policy
- Prevent Duty Guidance for Further Education– updated April 2021
- Keeping Children Safe in Education – updated September 2021
- HM Government Prevent Strategy (2015)

Referrals

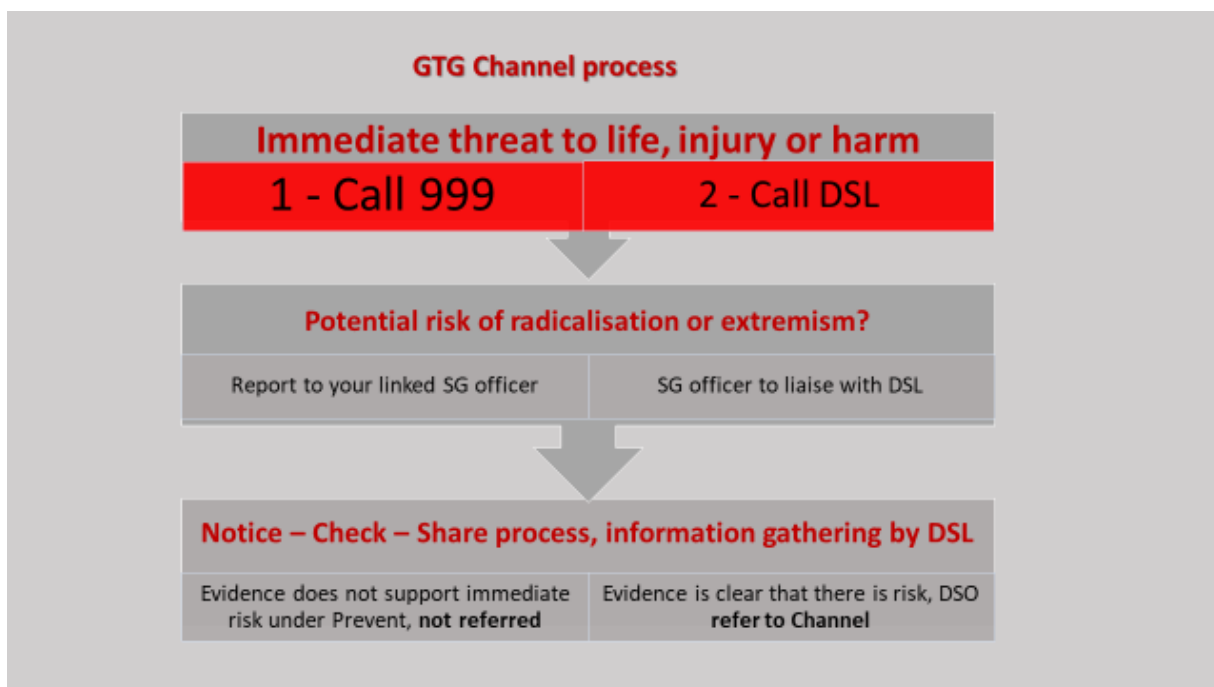
Potential risk of an employee, learner or stakeholder becoming involved in a terrorist act, supporting or following extremism, or attempting radicalise others will be notified immediately to the Safeguarding team. However, where immediate danger to life is clear and present, or where weapons or other harmful materials are evident an immediate 999 call must be made. Information must then be passed directly to the GTG DSL and GTG leaders.

Staff identifying a, non-immediate threat to life, Prevent concern will inform their linked safeguarding officer. The safeguarding officer will carry out the; **Notice - Check - Share** process. This process involved the DSL, leaders and managers and they will review the concerns and all evidence, prior to referring to Channel.

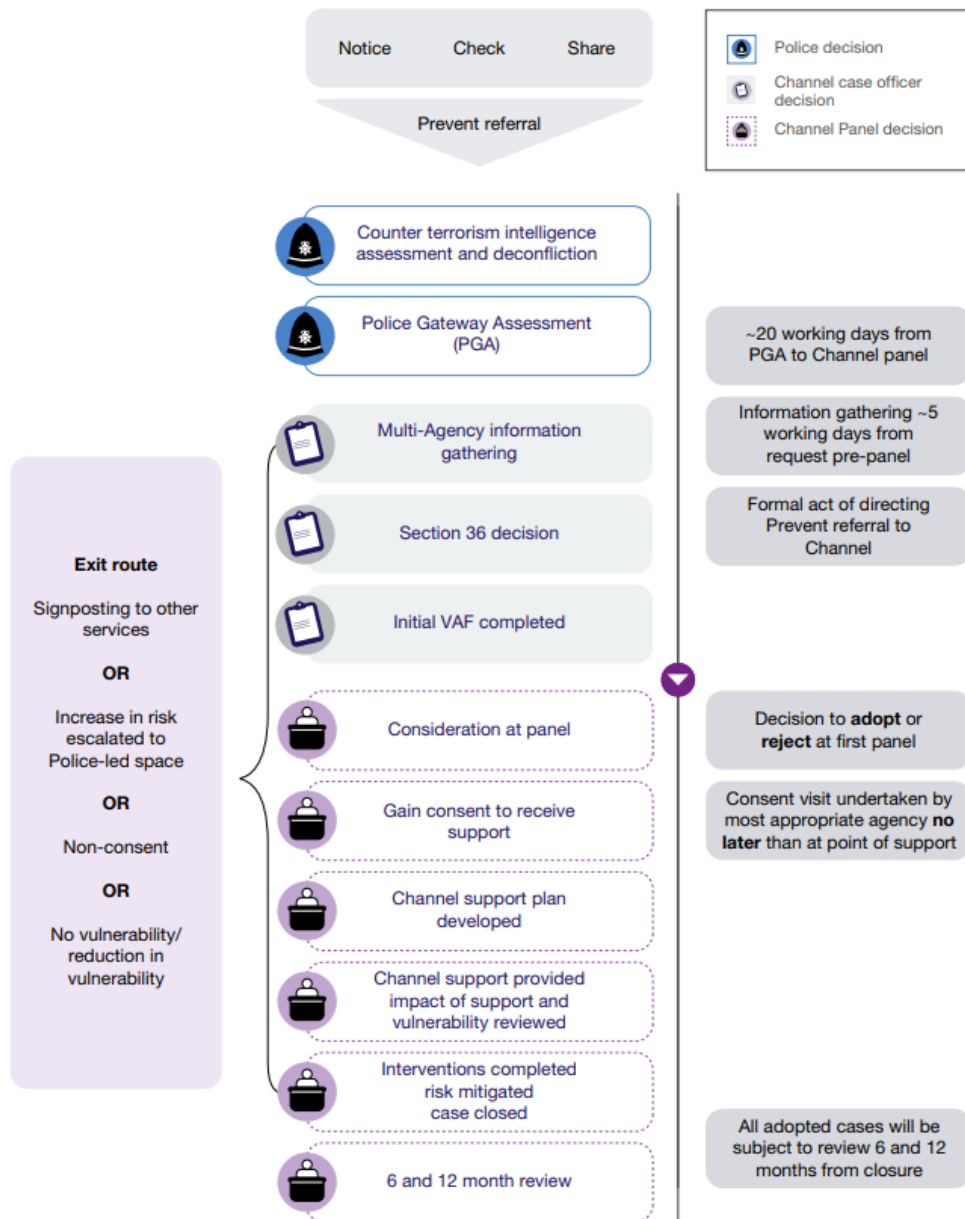
The referral process should be kept simple and easy to follow. Prevent concerns could be left to escalate if the process for referral is in any way complicated. There is a flow chart attached, to support the referral process within this policy.

Policy Review

This policy will be reviewed biennially, or sooner if required.



Channel Panel referral process



Policy review

This policy is reviewed in a cycle appropriate to its use, which is deemed to be on an annual basis, to ensure consistent application and in-keeping with Statutory duties. Any amendments or corrections are mediated by the DSLs and approved by the Managing Director. Policies are version controlled and documented.

Document revision				
Amendment	Date	Modifier	Version	Sign off
Version control	01/06/2019	Rosie Heron	1	Billy Hammond
Version control	14/07/2020	Rosie Heron	2	Billy Hammond
Version control	02/12/2020	Tom Madden	3	Billy Hammond
Version control	22/01/2022	Rosie Heron	4	Billy Hammond
Update Channel referral info	22/01/2022	Rosie Heron	5	Billy Hammond
Version control	18/01/2023	Rosie Heron	6	Billy Hammond
Version control	18/04/2024	Rosie Heron	7	Billy Hammond
Updated to new branding	23/06/2025	Nicole Hughes	8	Rosie Hawkins
Version control and review	03/04/2026	Rosie Hawkins	9	Billy Hammond