

Teitl: Title:	Prevent Policy
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Cydraddoldeb ac Amrywiaeth / Equality & Diversity

Dolen at Gam 1 Aseu Effaith (ar Gydraddoldeb a'r Gymraeg): / Impact Assessment Stage 1 (Equality & Welsh) link:	Prevent Policy EIA
<i>Effaith ar yr Iaith Gymraeg</i> <i>Mae asesiad effaith wedi'i gynnal ar y polisi hwn i ystyried ei effaith ar yr Iaith Gymraeg yn unol â Safonau'r Gymraeg (94-104) a Mesur yr Iaith Gymraeg (Cymru) 2011.</i>	<i>Welsh Language Impact</i> An impact assessment has been carried out on this policy to consider its effect on the Welsh Language in accordance with the Welsh Language Standards (94-104) and the Welsh Language (Wales) Measure 2011.

Adolygu a Chymeradwyo / Review and Approval

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Ymgynghoriad / Consultation:	Safeguarding Group		
Dyddiad cymeradwyo / Date Approved	Cymeradwyaeth y Pwyllgor Mewnol e.e. Grŵp Diogelu / Internal Committee Approval e.g. Safeguarding Group	<i>Safeguarding Group March 2023</i>	
	Pwyllgor Cyfathrebu a Diwylliant / Communications & Culture Committee:	<i>26th April 2023</i>	
	Pwyllgorau'r Bwrdd / Board Committees:	Pwyllgor Archwilio a Risg / Audit & Risk Committee:	<i>N/A</i>
		Pwyllgor Cwricwlwm a Safonau / Curriculum & Standards Committee	<i>N/A</i>
	Pwyllgor Cyllid, Pobl a Diwylliant / Finance, People & Culture Committee:	<i>25th May 2023</i>	
Corff Llywodraethu / Governing Body:	<i>21st June 2023</i>		
Dyddiad Adolygu: Review Date:	June 2024		

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Rhifwch bob adran a pharagraff
Please number each section and paragraph

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Prevent Policy

1. Introduction

- 1.1 Coleg Cambria aims to provide an environment which respects and values the positive contribution of all its learners to enable them to achieve their full potential and to gain benefit and enjoyment from their involvement in the life of the College. These values are also enshrined in the College's Strategic Plan.
- 1.2 To achieve this the college acknowledges the following basic rights for all its learners:
 - To be treated with dignity and respect
 - To be fairly treated
 - To receive encouragement to reach their full potential
- 1.3 The Government's Prevent Agenda is 1 of the 4 elements of CONTEST, the government's counter-terrorism strategy. It aims to stop people becoming terrorists or supporting terrorism.

The Government's Prevent strategy:

- responds to the ideological challenge we face from terrorism and aspects of extremism, and the threat we face from those who promote these views
 - provides practical help to prevent people from being drawn into terrorism and ensure they are given appropriate advice and support
 - works with a wide range of sectors (including education, criminal justice, faith, charities, online and health) where there are risks of radicalisation that we need to deal with.
 - covers all forms of terrorism, including far right extremism and some aspects of non-violent extremism.
- 1.4 The Counter-Terrorism and Security Act 2015 (Prevent Duty 2015) places a duty on specified authorities including schools, colleges and universities to 'have due regard, in the exercise of its functions, to the need to prevent people from being drawn into terrorism'. This is supported further by the Prevent Duty guidance (September 2015) for FE institutions in England and Wales and HE institutions in England and Wales (September 2015) respectively.
 - 1.5 This Policy outlines Coleg Cambria's approach to ensuring compliance with the requirements of the Act and the Prevent Duty, it's approach to dealing with concerns raised within its community, and its contribution to any multi-agency response to concerns raised.

There are four main elements to the policy:

- prevention through teaching and pastoral support systems
- procedures for identifying and reporting cases or suspected cases
- support for learners who may have extremist ideas that are part of terrorist ideology.
- to provide a safe and secure environment for all learners in the college.

- 1.6 The College has developed a culture of safety and respect for its students, colleagues , governors and visitors. As part of this ethos the College has considered the Prevent Duty and the importance of collaborative working between college staff, local authorities, police, other educational institutions, policy makers and health providers to identify, detect and safeguard vulnerable people throughout the organisation.

2. Prevent Duty

The Prevent Duty requires the College to:

- 2.1 Work in partnership with others (colleagues, governors, the local authority, the local safeguarding board, the police, health professionals, Prevent professionals etc.) to ensure student safety.
- 2.2 Risk assess all events and activities, off and on site, and to be aware of any where the possibility to have contact with or become involved in terrorism exists.
- 2.3 Provide sufficient pastoral care and welfare support for all students and use of a faith facility.
- 2.4 Have effective IT security (including the use of Wifi) and a responsible user policy in place.

3. Scope

- 3.1 This Policy applies to all individuals who come into contact with Coleg Cambria, including but not limited to:
- All Learners (including FE, WBL HE, Adult community, School Link learners and learner voice clubs and societies)
 - Colleagues
 - Volunteers
 - Governors
 - All external visiting speakers
- 3.2 It applies to all sites of the College including:
- Outreach centres (including those on employer premises)
 - Sub-contractors (including traineeship programmes, delivery partners)
 - Nurseries and Holiday clubs (both onsite and offsite),

4. Approach

- 4.1 To ensure that the College manages the risks in this area a Prevent Duty Action Plan is in place to allow the College to monitor and manage risks on an ongoing basis and deal appropriately with issues which arise.
- 4.2 The Prevent Duty Action Plan will be monitored on a monthly basis by the College's Designated Safeguarding Person with a termly update provided to the College's

Safeguarding Group. The action plan ensures that appropriate policies and procedures are in place to help identify and support individuals who may be vulnerable and/or at risk and also provide clear management oversight of the requirements.

4.3 The College seeks to identify individuals who may be vulnerable and/or at risk within its community at an early stage, be they a colleague or a learner, and ensure they are given appropriate support and welfare provisions. The College's responsibilities under the Act will be managed initially through existing safeguarding arrangements set out within this Policy, and also within the College's Safeguarding Policy.

5. Prevent Duty Objectives

5.1 The college seeks to protect its students against the messages of radicalisation and violent extremism including, but not restricted to, those linked to Islamic ideology, far right and extremist animal rights movements.

5.2 Prevent happens before any criminal activity takes place by recognising, supporting and protecting people who might be susceptible to radicalisation.

5.3 This will be achieved through:

- Embedding British Values within the curriculum
- Building staff and student understanding of the issues and confidence to deal with them
through staff development, specialist tutorials, awareness campaigns and engagement activities with local communities and faith groups.
- Ensuring student safety and that the College is free from bullying, harassment and discrimination
- Providing support for students who may be at risk and appropriate sources of advice and guidance
- Ensuring that students and colleagues are aware of their roles and responsibilities in preventing violent extremism.

6. British Values

6.1 The Prevent Duty states the British Values that are expected to be embedded into the curriculum offer and into the ethos of the College, they are:-

- Democracy
- The rule of law
- Individual liberty
- Mutual respect
- Tolerance of those with different faiths and beliefs

6.2 The College's Senior Management Team will lead on the embedding of British Values, together with the governing body. The Senior Management Team will establish guidelines and actions to be taken through the College's operation to ensure that British Values are understood by all and are integral to the College's culture reflecting the College's Values.

- 6.3 This will be achieved through:
- Promoting core values of respect, equality and diversity, democratic society, learner voice and participation throughout the College
 - Building staff and student understanding of the issues surrounding extremism and their confidence to deal with them
 - Actively working with local schools, local authorities, police and other agencies to ensure all staff at the college are aware of their statutory duties under Prevent so young people are not radicalised by external agencies.

7 Responsibilities

The College will:

- 7.1 Ensure that learners feel safe/secure and are listened to, and that they know whom they can approach if they are worried or in difficulty.
- 7.2 Designate a member of staff with overall responsibility for the protection of children and adults at risk, who will also be the Single Point of Contact for Prevent Concerns (SPOC). This is the Head of Learner Services (Designated Safeguarding Person) who will ensure that every colleague and Governor is made aware of the name and role involved.
- 7.3 Designate colleagues with direct responsibility for the day to day management of all issues relating to concerns over learners. These will be the Welfare Officers based on each site.
- 7.4 Refer all concerns or allegations of abuse promptly to the Welsh Extremism and Counter Terrorism Unit (WECTU).
- 7.5 The SPOC will represent the college at multi agency meetings /Channel Panel meetings in relation to the referral. The SPOC will be responsible for ensuring all colleagues are briefed on the regulations and practice outlined in this policy. This process will be monitored by the Safeguarding Group.
- 7.6 Requests for information from the Police/Security Services regarding individual learners at Coleg Cambria will be handled by the SPOC in accordance with current legislation.
- 7.7 Keep confidential and secure records of all such referrals. It is the SPOC's responsibility to ensure that copies of relevant referral forms and related documentation are held securely in accordance with the College's Data Protection Policy. Confidentiality remains a high priority and suspicions and investigations are shared only with those who need to know. Information is shared under the guidance of North Wales Counter Terrorism Police/Welsh Extremism and Counter Terrorism Unit (WECTU).
- 7.8 Carry out a risk assessment (Creating Safe Learning Communities) which will ensure that appropriate policies and procedures are in place to identify and support individuals who may be vulnerable and/or at risk and also to provide clear management oversight of the requirements. This risk assessment will be regularly reviewed and updated.

- 7.9 Ensure adequate training is in place for all colleagues, volunteers and partners and records kept.

Colleagues will:

- 7.10 Report any suspicions to the SPOC the same day by verbal referral or using the College Safeguarding Referral Form. Colleagues must not comment on any statements made or conduct any questioning of the learner. Appropriate training is given to colleagues to ensure this takes place.
- 7.11 Complete the External Visitor Speaker form electronically 14 days prior to a visit or online delivery session.

8. Referral Process

- 8.1 Any colleague, or learner may identify concerns about another member of staff or student who are vulnerable to the risk of being radicalised or drawn into violent extremism, based on information they have received or behaviour they or another individual have observed.
- 8.2 The College believes that it is important for those concerns to be shared in a safe and supportive environment, where appropriate intervention can be offered, if required. Referral should be made via the Safeguarding process which will be monitored by the Welfare Officer on each site and then if appropriate will be passed to the SPOC.
- 8.3 The SPOC will then discuss the concern with the reporting member of staff and if appropriate refer to the Channel Process (facilitated by North Wales Police and the relevant Local Authority) or referred for further support from the College Safeguarding team.
- 8.4 The SPOC will make the referral to the appropriate statutory agency. The SPOC will represent the college at multi-agency meetings / Channel Panel meetings, in whatever format that may be held, either in person or virtually, in relation to the referral.
- 8.5 If there is an immediate concern of danger to life or harm the correct referral process is to call 999 and then inform the SPOC at the earliest opportunity.

9. Information Sharing

- 9.1 Whilst the college has a duty to comply with the General Data Protection Regulation (GDPR), we will operate in accordance with lawful information sharing for the purposes of protecting and safeguarding students at risk of harm. This may include referral to the Channel Process, and / or referral to North Wales Police (under the terms of its Information Sharing Agreement).
- 9.2 Colleagues must not disclose information relating to a student, their welfare or personal information without express authorisation to do so from the Designated Safeguarding Person (DSP) or Deputy Designated Safeguarding Person. This stipulation includes where

a colleague may receive an information request from a parent, guardian or the police. The police are required to provide the college with a completed Personal Data Request Form.

9.3 In reaching a decision to share any information with third parties the College will adhere to its Data Protection policies which are in place. Confidential records of the information shared will be kept by the College's SPOC in accordance with guidelines within the College's policies. In all cases necessity, proportionality, risk and wherever possible the consent of the individual, (or parents for Under 18 year olds) will be key to determining whether information will be shared.

10. Training

10.1 Learners will receive regular training and information in order to inform them of, and raise their awareness of, the Prevent agenda as part of their safeguarding training supported by a bespoke tutorial delivered across Curriculum Areas by Progress Coaches.

10.2 Information of the Prevent Agenda and Duty will be promoted to students by inclusion in:-

- Curriculum offer, lesson planning and schemes of work
- Safeguarding posters
- Safeguarding policy and procedures
- Online induction information
- Training and development sessions

10.3 Colleagues will receive awareness training and guidance on how to deal with:-

- Inappropriate material and behaviours
- Disclosures by learners about their exposure to extremist actions, views or materials
- Accessing extremist material online
- Parental or peer concerns
- Intolerance of difference
- Anti-Western or Anti-British views
- The impact on the student and the FE Institution

10.4 The College will ensure that colleagues are familiar with the Prevent agenda, supported by the provision of refresher training, be able to promote British Values, understand how they can recognise practice and behaviours in students and colleagues and are aware of the course of action to take if they are concerned. Training will be mandatory via the college's e-learning module which is available to all colleagues to complete and renew every 3 years. Completion records are maintained by the HR Service.

10.5 Work Based delivery partners will be expected to undergo training in line with college guidelines and compliance is mandatory.

10.6 College Governors receive updates on safeguarding matters which include the Prevent agenda. Governors take a proactive role in the Prevent Strategy and receive training and regular reports from the Designated Safeguarding Person.

10.7 The College will recognise the role of the SPOC and arrange support and training and ensure the SPOC represents the college at appropriate meetings.

11. **ESFA (Education and Skills Funding Agency) Notification**

11.1 Colleges receiving annual funding allocations from the Education and Skills Funding Agency (ESFA) for the provision of education to students aged 16 to 18, or any young person aged 19 to 25 subject to an Education Health and Care Plan who requires additional support costing over £6,000, are required through the Conditions of Funding agreement to inform the ESFA of serious Prevent incidents

11.2 The main Prevent issues/referrals that the ESFA require to be notified about include;

- When the organisation, or one of its subcontractors is the subject of an investigation by the local authority or the police in connection with a Prevent issue.
- Where the College makes a referral of an individual for the purposes of determining whether that individual should be referred to a panel for the carrying out of an assessment under section 36 of the Counter Terrorism and Security Act 2015 of the extent to which that individual is vulnerable to being drawn into terrorism

In such circumstances the DSP shall ensure they notify the ESFA that a referral has been made, via the direct enquiries: Enquiries.ESFA@education.gov.uk, as specified.