

## POLICY MANUAL FOR **PREVENTING** EXTREMISM & RADICALISATION

### Introduction

This policy has been drawn up with close reference to the HM Government document 'Prevent Strategy', Statutory guidance issued under section 29 of the Counterterrorism and Security Act 2015, revised Statutory Guidance 2023, CONTEST – The United Kingdom's Strategy for Countering Terrorism 2023, and the regional Counter Terrorism Local Profiles (CTLP). There have been no specific changes to Prevent Duty, but statutory guidance now captures the requirements under the following heading: Leadership and Partnerships, Capabilities and Reducing Permissive Environments.

### Updated objectives of Prevent are:

- Tackling the ideological causes of terrorism
- Intervening early to support people susceptible to radicalisation
- Enabling people who have already engaged in terrorism to disengage and rehabilitate.

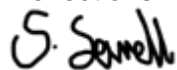
The Counter Terrorism and Security Act 2015 introduced the Prevent Duty for FE (Further Education) sector from 1st July 2015. The Prevent Duty requires the FE sector to have "due regard to the need to prevent people from being drawn into terrorism." The national security threat for the UK (United Kingdom) is currently rated as Substantial: this means a terrorist attack is likely. Birmingham and Bristol are seen as priority areas in terms of Prevent with Birmingham being in the top 3 national areas.

There are local characteristics which may mean that there is a greater possibility of radicalisation by prohibited groups. The risk of Islamic fundamentalism is extreme in Birmingham while in Bristol critical concern is associated with the far right. The threat of attack, especially by, single incident is as likely in city as anywhere else.

This Preventing Extremism and Radicalisation Policy is one element within Reflections Training Academies overall arrangements to safeguard and promote the welfare of all learners in line with our statutory duties set out at S157 of the Education Act 2002.

### Prevent / Safeguarding (DSL)

Reflections Training Academy



This policy was considered and adopted by the following Directors:



Clare Barrett  
Company Managing Director



Lucy Agnew  
Divisional Director of Training



Phil Davis



Kate Sperring

**Director of Bristol Training Academy**

**Director of Next Level Training**

Policy Owner	Director sign off	Details of update	Date of Update	Version number
Jason Timms	Lucy Agnew	Policy review & update	29/03/19	7
Jason Timms	Lucy Agnew	Policy review & update	21/04/20	8
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Jason Timms	Lucy Agnew	Policy review & Update	19/10/21	10
Jason Timms	Lucy Agnew	Policy review & Update	26/10/22	11
Suzanne Sewell	Lucy Agnew	Policy review & Update	30/10/23	12
Suzanne Sewell	Lucy Agnew	Policy review & Update	31/01/24	13

Next review date: January 2025

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### 1. Policy Statement

Reflections Training Academy is fully committed to ensuring all learners within its training provision are protected from harm and recognises its responsibilities for protecting learners and Team members from Extremism and Radicalisation in line with its Duty under the Prevent Agenda.

The Reflections policy for Preventing Extremism and Radicalisation applies to all team members working within Reflections Training Academies, employer partners, learners and any Guest Tutors / external speakers

### Academy Values and Ethos

When operating this Policy, the Reflections Training Academies use the following accepted Governmental definition of extremism which 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; and/or calls for the death of members of our armed forces, whether in this country or overseas’.***

The Training Academies will actively promote the fundamental British Values of:

- **Democracy** - All Learners within the Academy have a “Voice” either individually or through the Learner Ambassadors this promoting a democratic process. This learner voice is listened to and acted upon
- **the rule of law** - An appreciation that living and following under the rule of law protects individual citizens and is essential for your wellbeing and safety
- **individual liberty** - The right of an individual to act freely within the confines of law, without being oppressed or controlled by a government or other power
- **mutual respect and tolerance of different faiths and beliefs**- Respect and tolerance for each other. Treating others, the way you want to be treated, showing kindness & consideration. Accepting others for who they are

These values will be promoted and installed into learners alongside the Academy values of:

- **Professionalism** - Is how we are with people. That is how we promote and develop the Academy. It is how we approach and challenge tasks/duties.
- **Quality** - Is what this is in looks, detail, level of accuracy, standards of work and within presentation and delivery style etc.
- **Care** - For our people, learners, employers in how we make our decisions in meeting the objectives
- **Image** - How we look to others not only in appearance but in what we are.
- **Passion** - Is what we feel and how we bring this to others, Team members, learners, employers and that we maintain and develop this within Industry.

In meeting these values there is no place for extremist views of any kind in Reflections Training Academies, whether from internal sources: learners or team members: external sources – external partners, partner employers or clients.

Our learners see the academies as a safe place where they can explore controversial issues safely and where our tutors encourage and facilitate this – we have a duty to ensure this happens.

At Reflections Training we recognise that extremism and exposure to extremist materials and influences can lead to poor outcomes for learners and so should be addressed as a safeguarding concern as set out in the **Policy for Safeguarding Children, Young Persons and Vulnerable Adults**.

We also recognise that if we fail to challenge extremist views, we are failing to protect our learners.

Extremists of all persuasions aim to develop destructive relationships between different communities by promoting division, fear and mistrust of others based on ignorance or prejudice and thereby limiting the life chances of young people. Furthermore, we are aware that learners can be exposed to extremist influences or prejudiced views from an early age which emanate from a variety of sources and media, including via the internet, and at times learners may themselves reflect or display views that may be discriminatory, prejudiced or extremist, including using derogatory language. Any prejudice, discrimination or extremist views, including derogatory language, displayed by learners or team members will always be challenged and where appropriate dealt with in line with our Learner Concern process and **Learner Expectations & Behaviours** and the **Company Handbook Disciplinary Procedure** and **Safeguarding Learners Code of Conduct** for staff.

As part of wider safeguarding responsibilities Academy team will be alert to:

- Local Extremism Threats
- Disclosures by learners of their exposure to the extremist actions, views or materials of others outside of the Academy, such as in their homes or community groups, especially where learners have not actively sought these out.
- Materials, writing or artwork promoting extremist messages or images
- Learners accessing extremist material online, including through social networking sites
- Partner Employer reports of changes in behaviour, friendship or actions and requests for assistance
- External Partners, local authority services, and police reports of issues affecting learners
- Learners voicing opinions drawn from extremist ideologies and narratives
- Use of extremist or 'hate' terms to exclude others or incite violence
- Intolerance of difference, whether secular or religious or, in line with our equalities policy, views based on, but not exclusive to, gender, disability, homophobia, Ethnicity, colour or culture
- Attempts to impose extremist views or practices on others
- Anti-Western or Anti-British views

Reflections Training Academy will closely follow the Counter Terrorism Local Profiles communicated and any locally agreed procedures as set out by the Birmingham and Bristol Local Authority Safeguarding Children's Boards processes and criteria for safeguarding individuals vulnerable to extremism and radicalisation.

## Leadership and Partnership

### 2. Counter Terrorism Local Profiles

The footprint of extremist organisations and activity can vary nationally, and each regional police force will produce a Counter Terrorism local profile (CTLP) detailing the risks and activity within the region ~~regional~~. This is carried out twice yearly.

Within the West Midlands, the main threats with a footprint within the region are:

- **Extreme Right-Wing Terrorism (RWT)** - Sonnekrieg / Feuerkrieg Division, National Action, System Resistance network (alternative name for NA)
- **Islamic Extremism** - ISIS, Al-Qaeda, and **LASIT** (Left wing, Anarchist & Single-Issue Terrorism) – offshoots of BLM, Extinction Rebellion, HS2

With the Southwest area the main threats within a footprint with the the region are:

- **Extreme Right Wing (ERW)** - Sonnekrieg / Feuerkrieg Division, National Action (making up 90% of cases coming through Counter-terrorism police);
- **Islamic Extremism (IE)**- ISIS, Al-Qaeda and;
- **LASIT** - (Left wing, Anarchist & Single-Issue Terrorism) – offshoots of BLM, Extinction Rebellion, **Militant Animal Rights** (making up a mixture of the remaining 10%)

### Learners in multiple areas

Reasonable steps are taken by Reflections to ensure that we work in association with others to understand the risks or dangers from radicalisation and extremism in the area or areas in which we operate. Accessing information where available and sharable including consultation and information sharing with partners such as Local Authorities, other providers, prevent coordinators or police 'Prevent' teams."

### 3. Prevent Whistle Blowing / Raising a concern

Where there are concerns of extremism or radicalisation learners and team members will be encouraged to make use of our internal 'If in doubt, shout' system to raise any issue in confidence.

Team members can raise issues with the safeguarding team via **My Concern**.

Learners can raise issues in confidence with their tutor assessor or to a member of the Safeguarding Team by following the 'If in doubt, shout' reporting system.

Any concerns raised with the Safeguarding Team will be investigated in line with the Safeguarding process and if necessary, reported via the channel process, or directly to the Regional Counter Terrorism Unit (CTU)

### 4. Channel Referral

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Channel provides support to those who may be vulnerable to being drawn into terrorism. The overall aim of the programme is early intervention and diverting people away from the risk they may face. Channel referrals are voluntary, and the individual can choose not to engage.

Channel referrals if required can be referred to the relevant police force. Use of National Referral Form and clearly identified pathway for referrals in other areas (use of DfE (Department for Education) Coordinator network) will be utilised.

Birmingham - [Prevent@west-midlands.pnn.police.uk](mailto:Prevent@west-midlands.pnn.police.uk) or call: 0121 251 0239

Bristol – [channelsw@avonandsomerset.pnn.police.uk](mailto:channelsw@avonandsomerset.pnn.police.uk) or call 0117 945 5539

Guidance on whether the need to submit a Channel referral can be sought from the relevant Regional Prevent coordinator.

Where a referral is deemed necessary, Reflections DSL/DSO will refer to the respective panels in line with the safeguarding, online safety and mental health and wellbeing policies. Where possible, referrals to be made with the full involvement of the learner or member of staff.

## 16. Role of the Designated Safeguarding Lead

The Designated Safeguarding Lead – Suzanne Sewell:

[suzanne.sewell@reflectionstraining.co.uk](mailto:suzanne.sewell@reflectionstraining.co.uk)

The Designated Safeguarding Lead is the focal person for the Academy team who may have concerns about an individual learner's safety or well-being and is the first point of contact for external agencies.

In line with Recommendation 2 of Peter Clarke's Report into allegations concerning Birmingham schools arising from the 'Trojan Horse' letter, within Reflections Training the role of the Designated Safeguarding Lead has been extended, to include the responsibilities of the PREVENT DUTY strand of the Government's counter-terrorism strategy.

### Reflections Training Academy **Team responsibility**

All team members have within confines of this policy the responsibility to:

- Create and uphold Academy Values inclusive of Fundamental British Values
- Report Any Concerns of Extremism or extremist behaviours via correct safeguarding channels
- Remove and/or report any material that could cause offence
- Engage with local communities, local schools, and organisations as appropriate

## 17. Partnerships

Reflections Prevent leads have strong working relationships with the regional DFE / Home Office Prevent coordinators

Sheriyar Alamgir – Southeast (covering West Midlands)

[Alamgir.SHERIYAR@education.gov.uk](mailto:Alamgir.SHERIYAR@education.gov.uk)

Cheri Fayers – Southwest

[Cheri.FAYERS@education.gov.uk](mailto:Cheri.FAYERS@education.gov.uk)

Regional FE/HE briefs are held twice yearly and attended by the Prevent leads with updates to the CTLP's.

Birmingham Academy is a member of Birmingham Safeguarding / Prevent Curriculum group and West Midlands Independent Providers Prevent Network

Bristol Academy is a member of the Keeping Bristol Safe Partnership DSL network

## **5. Safeguarding**

Please refer to our Safeguarding Policy for the full procedural framework on our Safeguarding duties.

The team at Reflections Training Academy will be alert to the fact that whilst Extremism and Radicalisation is broadly a safeguarding issue there may be some instances where learners may be at direct risk of harm or neglect. For example; this could be due to a learner displaying risky behaviours in terms of the activities they are involved in or the groups they are associated with or team members may be aware of information about a learner's family that may equally place a learner at risk of harm. (These examples are for illustration and are not definitive or exhaustive).

Therefore all team members are required to report instances where they believe a learner may be at risk of harm or neglect to the Designated Safeguarding Lead via MyConcern.

The Safeguarding reporting arrangements are set out fully in our Safeguarding Policy and its appendices

Learners and employer partners can report worries or concerns via the 'If in Doubt, Shout' process to their relevant academy safeguarding lead, via the safeguarding contact form at [www.reflectionstraining.co.uk/safeguarding/](http://www.reflectionstraining.co.uk/safeguarding/) alternatively any concerns can be emailed to [safeguarding@reflectionstraining.co.uk](mailto:safeguarding@reflectionstraining.co.uk)

## **Capabilities**

### **Risk Assessment and Action Planning**

There are no standard format or prescriptive type of risk assessment and at Reflections, we choose to use the DfE Regional Coordinators template. We endeavour to perform a risk assessment which assesses how our learners or staff may be at risk of being radicalised in terrorism, including online. Divisionally, we access the respective CTLPs and use this information to inform our risk assessment, to brief appropriate staff and understand local/national/international risks.

Divisionally, we update our risk assessment at least annually and informed by the CTLP or Police/Local Authority and Partnerships briefings/engagement.

Where we identify a specific risk, we develop an action plan to set out the steps we will take to mitigate the risk. This plan will be regularly updated with clear review dates and accountability by academy Directors.

Please refer to appendices for Prevent Referral Pathways documents.

## **6. Team Training and understanding**

## **Induction Process and Schedule**

All Team Members (excluding admin support) are required to complete the Home Office Prevent eLearning and the Education Training Foundation (ETF) Prevent eLearning modules and assessment; this is embedded in their induction process and schedule to ensure the training teams are adequately equipped for their role. Where required ad hoc training will be scheduled against any highlighted localised risks in knowing on what action is needed to be taken.

When planning any training, DSL/DSO will consider the appropriateness and reliability of the training materials, including if it is suitable for our context and from a reliable source. Any proposed training must include local issues as well as national; what the duty requires and is factually correct.

At least annual updates linked to Keeping Children Safe in Education and Prevent Duty are delivered; and where significant updates are provided by Prevent Networks.

Details of all staff prevent training is recorded on the Safeguarding Training Matrix in monitoring the individual's delivery of training received.

## **Designated Safeguarding Lead (DSL)**

Will receive more in-depth training, including on extremist and terrorist ideologies, how to make referrals and how to work with Channel panels. This should be refreshed every 2 years.

## **7. Learners Training and understanding**

Education is a powerful weapon; equipping young people with the essential knowledge, skills, and critical thinking, to challenge and debate in an informed way. Safeguarding and the Prevent duty is delivered and plays an integral part in the learner's induction.

All learners will partake in a Prevent session and a declaration of understanding will be gained.

Learners will go on to complete the 4 online modules of the EFT side by side programme which is embedded within the programme's curriculum/scheme of work.

Within the training curriculum programme Reflections Training Academy will also provide a broad and balanced safeguarding and Equality, Diversity and Inclusion programme with embedded Fundamental British Values, delivered via sessions, 'Monthly Theme' sessions and additional workshops, so that our learners are enriched, understand and become tolerant of difference and diversity and to ensure that they thrive, feel valued and not marginalized. British Values will be embedded within other areas of the curriculum as relevant. Online resources are made available for all learners needing alternative ways to access. Learners will have a greater understanding of local risks and avenues of support.

We make every effort to give space in which learners and staff can understand and discuss sensitive topics, including, where appropriate, terrorism and the extremist ideas that are part of terrorist ideology, and learn how to challenge these ideas. By promoting shared values, we can help build resilience to radicalisation and extremism.

## **Reducing Permissive Behaviours**

## **8. Prevent Internet Safety / Social Media Policy**

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We recognise the risk posed to our Learners of online radicalization, as well as online extremist propaganda including but not limited to images and videos that present extremism and radical behaviours and views as an exciting alternative to Fundamental British Values and that social media encourages supporters to share the material with a wider online audience.

To combat this online threat our IT systems, have appropriate firewalls and site blocking software in place on all Academy IT Servers; Lan School A database of all known extremist keys word is within Lan School and the firewalls which are frequently reviewed and updated. Access to all social media sites blocked from Reflection's learner servers and all learners have a personal log in for ease of identification.

Each learner at the training academies has individual logins and any inappropriate internet access is immediately flagged by LanSchool to IT Team who will escalate to the safeguarding team.

Reflections cannot control what learners, team members and client's access on their own personal devices however through education, vigilance and a safe and secure system for learners to disclose concerns this is considered low risk.

All learners attending Reflections agree to an Acceptable Use of Technology Agreement that details behaviours and expectations when using IT, including clear reference to the Prevent Duty. This applies to all Learners who have access to and are users of Academy ICT systems, both in and out of the Academy.

The Academy will deal with such incidents within this policy and associated Acceptable Use of Technology Agreement within its learner behaviour and conduct policies.

Any suspicious websites can be reported via <https://www.gov.uk/report-terrorism>

Staff will be updated in line with CTLP's of any emerging online threats/platforms of concern via CPD (Continuing Professional Development) events

## **9. Information Sharing Protocols**

Effective information sharing is key to the delivery of the Government's Prevent Agenda, so that appropriate action can be taken e.g., referrals to Chanel or Counter Terrorism Units and local police force prevent teams.

Any sharing of personal or sensitive personal data will be considered carefully, particularly where the consent of the individual is not gained and will be fully in line with the requirements of the UK-GDPR and the Data Protection Act.

## **10. Use of External Speakers / Agencies and individuals Policy**

When using external agencies or individuals to enrich the experiences of our learners, we will as far as reasonably possible, ensure those external agencies or individuals who we engage with to provide such learning opportunities or experiences for our learners follow Reflections Training Academy's Equality, Diversity & Inclusion Policy and ensure that:

- Any messages communicated to learners are consistent with the values and ethos of the organisation and do not marginalise any communities, groups or individuals
- Any messages do not seek to glorify criminal activity or violent extremism or seek to radicalise learners through extreme or narrow views of faith, religion or culture or other ideologies

- Activities are matched to the needs of learners
- Activities are carefully evaluated by the Training Academy to ensure that they are effective

To meet these aims any team member will complete a **Visiting Tutor / Guest Speaker checklist form (Appendix 1)** and get authorisation from academy DSL/DSO and/or in the absence of personnel, Directors.

Any Visiting Tutor / Guest Speaker will need to complete and commit to a **Visiting Tutor / Guest Speaker Agreement form (Appendix 2)** before carrying out any sessions with Learners and if a regular Visiting Tutor / Guest Speaker to be refreshed annually.

The effectiveness of sessions will be evaluated via established and robust QA processes.

## 11. Freedom of Speech Policy

Reflections Training Academy openly acknowledges and encourages Freedom of speech for its Learners. These freedoms of speech protected by this policy are confined to freedom of speech within the law. Reflections believe that a culture of free, open and robust discussion can be achieved only if all concerned avoid offensive or provocative action and language. Whilst there is no legal prohibition on offending others, Reflections Training expects speakers and those taking part in meetings or activities to respect its values, to be sensitive to the diversity of its community and to show respect to all sections of that community in line with its core values. Anything likely to give rise to an environment where harassment, intimidation, verbal abuse or violence is felt, particularly because of their ethnicity, race, nationality, religion or belief, sexual orientation, gender, disability or age, is also likely to be unlawful and against Reflection's core values and is not allowed. These areas and subsequent outcomes if not met are covered with the Company handbook (for team members), learner conduct policy (for learners) and Visiting Speaker agreement (for visiting speakers).

## 12. Letting of Premises

Letting of Premises or Facilities is a very rare occurrence. On the rare occasions that this happens, suitable safeguards and checks will be put in place to ensure that usage is in line with Academy Values and ethos. Reflections are entitled to refuse a request to lease its premises (or part of) for any use which does not match our core values and behaviours.

## 13. Distribution of Leaflets or other Publicising Material Policy

The sale, distribution or display of posters, publications or leaflets within Reflections Training Academy Buildings by learners, team members or others is prohibited unless prior authorisation has been obtained from designated members of the Senior Management Team.

Any request to distribute or display posters, publications or leaflets will be reviewed in line with Academy values and marketing strategies.

Any sale, distribution or display of posters, publications or leaflets that are outside this policy and Reflections values will be removed and dealt with through the relevant procedure: Company handbook (for team members), learner conduct policy (for learners) and Visiting Speaker agreement (for visiting speakers)

## 14. Fundraising

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Any fund-raising activities carried out can only be authorised by senior management and only Charity Commission Registered Charities are to be recipients of any funds raised. No fundraising outside of this will be considered. The promotion of fundraising is to be in line with the distribution of the leaflets/poster section of this policy manual.

## 15. Recruitment

The arrangements for recruiting all Team members to Reflections will follow the Safe Recruitment Policy, including, but not limited to, ensuring that DBS checks are always made at the appropriate level, that references are always received and checked and that we complete and maintain a single central record of such vetting checks.

We will apply safer recruitment best practice principles and sound employment practice in general and in doing so will deny opportunities for inappropriate recruitment or advancement.

We will be alert to the possibility that persons may seek to gain positions within Reflections to unduly influence our character and values. We are aware that such persons seek to limit the opportunities for our learners thereby rendering them vulnerable to extremist views and radicalisation as a consequence.

Therefore, by adhering to a safer recruitment policy and by ensuring that there is an ongoing culture of vigilance within the Academy and team we will minimise the opportunities for extremist views to prevail.

## Networks and Support

- Counter-terrorism strategy (CONTEST) 2023 – GOV.UK ([www.gov.uk](http://www.gov.uk))
- Prevent Duty Guidance: England and Wales (2023) - GOV.UK ([www.gov.uk](http://www.gov.uk))
- Keeping Children Safe in Education (2023) - publishing.service.gov.uk
- Get help for radicalisation concerns – GOV.UK ([www.gov.uk](http://www.gov.uk))
- DSL Prevent Handbook – the prevent duty: safeguarding learners vulnerable to radicalisation – GOV.UK ([www.gov.uk](http://www.gov.uk))
- [Prevent duty training: Learn how to support people susceptible to radicalisation | Prevent duty training \(support-people-susceptible-to-radicalisation.service.gov.uk\)](https://prevention.support-people-susceptible-to-radicalisation.service.gov.uk)
- [Making a referral to Prevent - GOV.UK \(www.gov.uk\)](http://www.gov.uk)

## Filtering and Monitoring

- Appropriate filtering and monitoring – UK Safer Internet Centre
- Filtering Provider Responses – UK Safer Internet Centre
- Filtering and Safe Tech – LGFL (London Grid for Learning)

## The Education Training Foundation

- Prevent legislation, guidance, and resources – The Education and Training Foundation ([et-foundation.co.uk](http://et-foundation.co.uk))
- Safeguarding and Prevent – The Education and Training Foundation ([et-foundation.co.uk](http://et-foundation.co.uk))
- Educate Against Hate – Education focused resources and advice – <https://educateagainsthate.com/>
- Home Office Online prevent training for staff