



UKCAB
UK Curriculum and Accreditation Body



Anti-Radicalisation Policy and Prevent Procedures

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1.1 Introduction

Higher Education Institutions (HEIs) in the United Kingdom, including the Scholars School System (SSS) are required by law to implement the anti-radicalisation programme called 'PREVENT'. On the 31st of December 2023, the Home Office devised appropriate guidance to HEIs for the introduction and implementation of the counter-Terrorism policy (PREVENT), targeting students and staff alike. Therefore, this report will discuss the definition of the terminology, its underlying theory, the process of exploitation and radicalisation, personal susceptibility, and the safeguards in place to keep SSS students and staff safe from radicalisation.

1.2 Purpose/Aim:

The primary aim of this report is to consistently review and implement UK government's PREVENT policy across the school and provide appropriate guidance to its students and staff.

1.3 What is Prevent?

PREVENT is used to stop people's pre-criminal involvement in any planned attacks and/or acting. On the other hand, radicalisation is the process of adopting extremist views about a political or social cause. The lack of the UK Government's ability to clearly define extremism has left it to whims of academics to provide varied definitions. However, extremism is when an individual has 'obsessive ideological passion' which leads to acting due to an 'insecure sense of identity'. For this report, the term extremism implies a "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" (Prevent duty guidance, 2015: 6).

PREVENT's headline within CONTEST (2011) is "to stop young adults/adolescents becoming terrorists or supporting terrorism", and the implementation of the mandate in 2015 has increased efforts to achieve this objective

CONTENT is made up of four key programmes, each with a specific objective:

- PURSUE: to stop terrorist attacks
- PREVENT: to stop people becoming terrorists or supporting terrorism
- PROTECT: to strengthen our protection against a terrorist attack
- PREPARE: to mitigate the impact of a terrorist attack

1.4 The Prevent Strategy Has Three Specific Strategic Objectives:

- Respond to the ideological challenge of terrorism and the threat we face from those who promote it;

- Prevent people from being drawn into terrorism and ensure that they are given appropriate advice and support; and
- Work with sectors and institutions to address risk of radicalisation

Terrorist organisations often leverage extremist ideologies fostered by extremist organisations. Young people or adults who become part of terrorist groups may have previously whether consciously or unconsciously been affiliated with such organisations, which influences their radicalisation. The Prevent strategy underwent explicit revisions in 2011 to address all manifestations of terrorism, targeting not only violent extremism but also non-violent extremism. This non-violent extremism can cultivate an environment conducive to terrorism, propagating viewpoints exploited by terrorists. The strategy emphasises the necessity of challenging extremist ideologies that legitimise terrorism and are embraced by terrorist groups, to deter individuals from embracing terrorist activities/sentiments or supporting terrorism. Moreover, the strategy involves proactive intervention to prevent individuals from transitioning from extremist (though legal) groups into activities related to terrorism.

By enacting PREVENT as a safeguarding measure, it is evident that an educational setting is a prominent place for anti-radicalisation initiatives due to the development of ideas and experiences. Thus, HEI is a suitable environment for implementing PREVENT and if interpreted as safeguarding, it can be used in an effective way. However, although HEI is bound by PREVENT, the difference that the sector can make to the UK Government four strand counter-terrorism strategy is still not clear. Safeguarding is the physical and mental wellbeing of an individual to protect himself/herself from harm, and that it is commonly used at universities for non-Prevent related issues.

It is imperative that, the prevent duty for higher education institutions Compliance is monitored by the Office for Students (OfS) and evidence of HEIs requirements are stipulated below (Office for Students, 2020):

- i) Assess the risks associated with Prevent and draw up a mitigation plan;
- ii) Have effective welfare support systems, linking to DfE Prevent coordinators, local authorities, or the police if necessary;
- iii) Have systems for assessing and mitigating risks around external speakers and events on campus, while maintaining the existing duty to promote freedom of speech;
- iv) Arrange ongoing Prevent training for relevant staff;
- v) Have an IT usage policy, and where appropriate a research policy, which cover the Prevent duty;
- vi) Engage with students and ensure that students' unions and societies are aware of policies concerning activities on campus.

1.5 Definitions of Key Terminologies

- An Ideology is a set of beliefs.
- Radicalisation is the process by which a person comes to support terrorism and forms of extremism leading to terrorism.
- Safeguarding is the process of protecting vulnerable people, whether from crime, other forms of abuse or from being drawn into terrorism-related activity
- Terrorism is an action that endangers or causes serious violence, damage or disruption and is intended to influence the government or to intimidate the public and is made with the intention of advancing a political, religious, or ideological cause.
- Vulnerability describes factors and characteristics associated with being susceptible to radicalisation.
- 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. Calls for the death of British armed forces is also included.

1.6 The Process of Exploitation

There is not a single profile or clear indication predicting who might become involved in terrorist-related activities, nor is there a single rationale explaining why vulnerable young people are drawn into such actions. However, it is evident that, the factors contributing to exploitation are diverse and unique to each person. Prevent Duty Guidance (2015) suggests that factors related to the subjective experiences of vulnerable individuals influence how they engage with their surroundings. Consequently, these vulnerable individuals may be exploited in several ways by radicalisers who exploit their vulnerabilities. Contact with radicalisers varies, ranging from direct interactions, for example, face-to-face encounters to indirect engagements through the internet, social media, or other channels. It is evident that, it usually involves a combination of both methods (Prevent duty guidance, 2015).

1.7 Contact with Radicalisers

It is evident that vulnerable individuals more commonly get involved in terrorist-related activities through social influences. This influence often begins with contact from peers, siblings, other family members, or acquaintances, with the process of radicalisation typically unfolding in social settings. These social interactions occur in various unsupervised environments like gyms, cafes, private homes, and online platforms. In addition, accessing extremist materials, including leaflets and local connections often exacerbates the situation. However, the internet plays a pivotal role in disseminating extremist views. It serves as a platform for extremists to promote their agendas and foster discussions via websites, online

forums, and social media networks. The internet proves to be a rapid and efficient tool for spreading propaganda materials.

Universities present new surroundings for students, which enables them to have impressions on a range of issues. It is important to note that when students joined universities, they make new friends, and thus, become opened to a wide range of opportunities, ideas, and influences. Alongside these new surroundings, mental illness among university students is rising, which increases the risk of interaction with radical groups. Mental illness among university students is increasing significantly, and that it usually occurs when they are in the first and/or second year of their study. Studies show that one in four university students suffer from mental health problems. Thus, making them increasingly vulnerable to radicalisation. Prevent guidance further acknowledges that most activities likely to radicalise students happen off-campus (Prevent duty guidance for HE, 2015), which affects its (PREVENT) effectiveness.

Consequently, HEIs, especially SSS should remain vigilant in relation to students, who frequently visit websites depicting images of armed conflicts worldwide as well as limiting their access to inspirational speeches and materials from people involved in the radicalisation process.

1.8 Use of Extremist Rationale (often referred to as Narrative)

Radicalisers usually attract people to their cause using persuasive rationale in a storyline or narrative that has the potential to influence others. Consequently, the main drive of those seeking to radicalise vulnerable individuals is to inspire new recruits, solidify the convictions of those already holding extreme views, and most importantly, persuade others of the legitimacy of their cause/action.

1.9 What Factors Might Make Someone Vulnerable

It is important to note that pertaining to personal vulnerability, the factors below may affect an individual's susceptible to exploitation. However, it is important to highlight that none of these said factors independently are conclusive, and thus they should be used in tandem with the individual's circumstances, including any other indicators of radicalisation.

1.9.1 Isolation and Identity Crisis

Adolescents/vulnerable adults, especially students, who are exploring issues of identity can feel both distant from their parents/family as well as their cultural and religious heritage. They may feel uncomfortable and unsure of their place in society. Thus, it is prudent to note that where there are feelings of isolation and loneliness, radicalisers can exploit this gap by providing a sense of purpose or feelings of belongingness to the victims. Where this

occurs, it can often manifest itself in a change in a person's behaviour, their circle of friends, and the way in which they interact with others and spend their time.

1.9.2 Personal Crisis and Circumstances

It is noteworthy that conflict within a family can result in a vulnerable adolescent/young adult feeling disconnected from the traditional stability and values of a family life/dynamics. Thus, affecting their sense of belonging or connectivity with the family. For example, migration experiences, ethnocentrism, local tensions, or events impacting families in their countries of origin can foster a sense of alienation from UK values, leading to a choice of inflicting harm on society, community or state symbol(s).

1.9.3 Grievances

Grievances refers to the collective identity, sympathetic feelings, or positive responses to emotions, images, or memories. Systematic attention to grievances can aid in reconciling how and why particular emotions, images, or memories triggers threats. Grievances is the shared feelings of injustice and strong collective identity attachments.

The following are examples of grievances which plays a critical part in early indoctrination of vulnerable individuals into accepting a radical view and/or extremist ideology:

- A misconception and/or rejection of UK foreign policy
- A distrust of western media reporting
- Perceptions that UK government's policy is discriminatory (e.g. counter-terrorist legislation)
- Perception that their aspirations for career and lifestyle are undermined by limited employment prospects
- The 'world owes them a favour'

In addition to the above, other factors have been highlighted as drivers for vulnerable young adults/adolescent joining certain groups to support terrorism-related activity, including:

- Ideology and politics and/or youth rebellion
- Provocation and anger (grievance)
- Need for protection
- Seeking excitement and action
- Fascination/morbid interest in violence, weapons, and uniforms
- Seeking family and father substitutes
- Seeking friends and community, status, and identity.

2.1 Policy Statement

In accordance with the legislative requirements of the UK and Wales counterterrorism 2015 Act and subsequent Acts, SSS has put in place mechanisms to manage risks related to potential radicalisation of individuals using a risk-based approach to satisfactorily fulfil its PREVENT duty. To adhere to this duty, the institution has specified that all authorities should take the basic step(s) to demonstrate or exhibit consciousness, awareness, and comprehension of the risk of radicalisation within their authorities as well as the institution as a whole. It is noteworthy that the risk level can periodically vary/fluctuate, and therefore, it is understandable that the agreed policy may evolve swiftly, but precautionary measures will be taken consistent with the evolution. Hence, it is evident that no department/unit or centre as well as the institution can be declared completely risk-free, but sign-posting staff with knowledge of PREVENT duty, including the steps to be taken to safeguard and support at risk students from radicalisation can help reduce or eliminate the risk. In addition, since the nature and scope of actions to mitigate risk across SSS differs, all specified authorities must accord it appropriate consideration.

2.2 Channel Duty Guidance:

2.2.1 Identifying Vulnerable Individuals

All CPPs (Channel Police Practitioners) and local authority should establish robust connections between professionals encountering vulnerable individuals across various sectors, including education, social services, healthcare, youth services, offender management services, and reputable community organisations. CPPs and local authorities should use their networks to highlight the importance of protecting those who are susceptible to being drawn into terrorism and raise awareness about how the Channel can provide support. Broadly speaking, therefore, Panel members are not expected to attain expertise in countering radicalisation leading to terrorism. However, they are expected to have completed the Channel General Awareness eLearning and Workshop to Raise Awareness about PREVENT (WRAP) training. This will ensure that they are equipped to identify certain indicators that someone may be susceptible to being drawn into terrorism.

2.2.2 Referral Stage

At SSS, referrals are often made in the first instance by individuals who encounters vulnerable students/staff. WRAP training outlines the process how this can be done. When the initial referral is received, the CPP will assess whether the case is appropriate for Channel review/assessment. Part of the CPP's role is to filter out any inappropriate referrals. Thus, all referrals that progress to the Channel process will be subjected to a thorough assessment for vulnerabilities. The initial assessment is overseen by the CPP and involves their line manager along with, if necessary, a senior representative from Panel partners. Risk remains a central focus throughout the entire Channel process, encompassing risks to the individual, the public, and partners or organisations offering

support, including intervention providers. The panel is tasked with effectively managing these risks concerning the vulnerable individual.

There are three themes throughout the sector-specific guidance, set out later in this document: **effective leadership**, **working in partnership** and **appropriate capabilities**.

2.2.3 Leadership

For all specified authorities, we expect that those in leadership positions:

- Establish or use existing mechanisms for understanding the risk of radicalisation;
- Ensure staff understand the risk and build the capabilities to deal with it;
- Communicate and promote the importance of the duty; and
- Ensure staff implement the duty effectively

2.2.4 Working in Partnership

The effectiveness of PREVENT initiatives hinges on successful partnerships. To showcase adherence to the duty, specified authorities must provide tangible evidence of fruitful collaboration with local Prevent coordinators, law enforcement, and local authorities. This collaboration should be facilitated through existing multi-agency forums, such as Community Safety Partnerships, demonstrating coordinated efforts in preventing radicalisation.

2.2.5 Capabilities

Staff who engage with the public should understand what radicalisation means and why people may be vulnerable to it. They need to be aware of what we mean by the term “extremism” and the relationship between extremism and terrorism (refer to the introduction for Government Definition).

Staff need to know what measures are available to prevent people from becoming drawn into terrorism and how to challenge the extremist ideology that can be associated with it. They need to understand how to obtain support for people who may be exploited by radicalising influences.

All specified authorities subject to the duty will need to ensure they provide appropriate training for staff involved in the implementation process. This training is now widely available for all staff across the different SSS campuses/centres.

2.2.6 Sharing information

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 on the Channel programme. Despite this avowed understanding, information sharing is assessed on a case-by-case basis and is governed by legislation. To ensure the rights of individuals are fully protected, it is important that information sharing agreements are in place at a local level. When considering sharing personal information, the specified authority should take account of the following:

- 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 judgment of the risks to an individual or the public.
- Consent: wherever possible the consent of the person concerned should be obtained before sharing any information about them.
- 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 1998 and the Human Rights Act 1998.
- Data Protection Act and the Common Law Duty of Confidentiality: in engaging with non- public bodies, the specified authority should ensure that they are aware of their own responsibilities under the Data Protection Act.

There may be some circumstances where specified authorities, during *Prevent*- related work, identify 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. Contact details for the FE/HE Regional Prevent Coordinators are on the last page.

2.3 Higher education and skills – Specific Guidance

The *Prevent* consultation document sets out specific duties for specified authorities such as, higher education institutions on the Skills Funding Agency (SFA) register. There is an important role for higher education institutions, including sixth form colleges, in helping prevent people being drawn into terrorism, which includes not just violent extremism but also non-violent extremism, which can create an atmosphere conducive to terrorism and can popularise views which terrorists exploit. It is a condition of funding that all higher education providers must comply with relevant legislation and any statutory responsibilities associated with the delivery of education and safeguarding of learners.

SFA funded Skills provision is specified in Schedule 3 of the Act:

Higher education institutions on the Skills Funding Agency (SFA) register includes approximately 950 colleges and independent providers such as private companies and third sector organisations that are eligible to receive public funding from the SFA to deliver education and training as well as subcontractors who receive more than £100,000 of SFA-funding via lead providers. Compliance with this duty will reflect

existing best practices and should not significantly add new burdens on institutions. It will be implemented in a proportionate and using a risk-based approach. Scholars School System (SSS) will comply with its Prevent duty using the following mechanisms:

2.4 Partnership

Scholars School System will:

- Engage with other partners including police and local authority *Prevent* coordinators.
- Appoint an internal single point of contact for operational delivery of *Prevent*-related activities.
- Share information with partners where appropriate and in a manner as outlined on the previous page.
- Have regular contact with their regional higher education *Prevent* coordinators.

2.5 Risk assessment

Scholars School System periodically conducts a *Prevent* Risk Assessment for its staff, and it is available upon request. To mitigate against the risk of extremism and radicalisation, Scholars School System will employ the following mechanisms:

Establishing comprehensive policies that encompass staff, learners, learning processes, and infrastructure management, capable of identifying individuals who may be at risk of radicalisation are essential ingredients to preventing or curbing radicalisation. These policies should align with the company's obligations under the Equality Act 2010, covering learner welfare including:

- Equality and diversity
- Safety of learners
- Safety of staff, and
- Raising awareness of the risks of being drawn into terrorism through *Prevent* awareness training programmes.
- Risk assessments to address the physical management of the institution's estate, including policies and procedures for events held by staff, learners or visitors, and relationships with external bodies and community groups who may use premises, and/or work in partnership with the institution.
- Comprehensive and visible policies and procedures for managing whistle blowing and complaints.

- Established protocols are in place to evaluate partners delivering courses and ensures that this does not inadvertently contribute to funding extremist organisations.
- If a risk is identified, SSS will evaluate the necessity of informing the Prevent coordinator and other relevant parties, and subsequently formulate a Prevent action plan.

2.6 Staff Training

Compliance with the duty will also require Scholars School System to demonstrate that it is willing to undertake appropriate Prevent awareness training and development for governors, leaders and staff, which will prevent them from being drawn into terrorism. It will also enable the training assessor/tutor and others supporting delivery of the curriculum to use the opportunity to educate and challenge extremist ideas, especially those drawing people into terrorism. In addition, it will support all SSS staff to exemplify British values in their management, teaching and general behaviours, including ensuring that opportunities in the higher education curriculum are used to promote British values for learners.

The Government define fundamental British values as “democracy, the rule of law, individual liberty and mutual respect and tolerance for those with different faiths and beliefs” and expect institutions to encourage students to respect people with protected characteristics set out in the Equality Act 2010.

2.7 Corporate Social Responsibility

Scholars School System will therefore ensure that:

- Our staff understands the factors that make people vulnerable to being drawn into terrorism and to challenge extremist ideas which are used by terrorist groups to purport and legitimise terrorism.
- Our staff have sufficient training to be able to recognise this vulnerability and be aware of what action to take in response.
- A specialist is engaged who will understand the process and policies in place when vulnerability has been identified, know when to make referrals to the ‘Channel Programme’ and where to get additional advice and support.
- Training is accessed through the network of regional higher education Prevent coordinators.
- All training undertaken will be revised annually, as and when needed.
- Training and practice are embedded in staff development as well as within the learners’ programme.

2.8 Welfare, Pastoral Care, Chaplaincy Support, Prayer and Faith Facilities

Welfare, pastoral care, chaplaincy support, and prayer and faith facilities are distinct sections within the existing Prevent guidance. These sections encompass:

- Ensuring adequate care, facilities, and support for all learners, including the consideration of multi-faith chaplaincy as an additional form of welfare support, especially in institutions like SSS with diverse learners, and providing prayer facilities to accommodate their religious needs.
- Safeguarding learners in all environments where they might be susceptible to radicalisation, such as prayer rooms, by ensuring these spaces are not used for disseminating extremist ideologies or grooming individuals.

In lieu of the above, SSS will provide all our learners with sufficient support across the areas listed based on the needs of individuals

2.9 External Speakers and Events (Greater than 100 Delegates)

An external speaker or visitor refers to any individual or organisation who is not a contractual partner, staff member, or learner enrolled at Scholars School System but has been invited to speak to staff or learners. The Prevent duty and guidance does not seek to ban any speakers or impinge on freedom of speech. However, the duty and guidance ensure that the right processes are in place to manage events and speakers. Based on the effective practices observed by Prevent coordinators and their desire for replication, this could entail:

- Ensuring an adequate notice period for checks to be conducted, which may not always involve the police—this could involve utilising open-source methods by the hosting organisation. This might include investigating any instances of potential hate speech occurring at prior events.
- Establishing processes or protocols to illustrate how information about the speaker is utilised to determine whether their event should proceed or not, following a thorough risk assessment.
- Requiring speakers to adhere to the organisation's equality and diversity policy by signing an agreement.
- Providing evidence of the ultimate decision regarding whether to permit the speaker into the organisation, along with any implemented mitigation measures.

An event is any activity, presentation, visit or initiative organised by a staff, group, department or individual held on the Scholars School System's premises or where Scholars School System is represented at either an occasion, exhibition or fair using a stall/stand on non-Scholars School System premises. It also includes activities where external speakers are streamed live on an occasion or any pre-recorded film. In addition, it can be any activities held on Scholars School System premises but organised by external clients.

The individual or group organising the event should inform all speakers or visitors of their obligation to comply with the law and adhere to the policies of Scholars School System, including the following:

- Must not advocate or incite hatred, violence or call for the breaking of the law
- Are not permitted to encourage, glorify or promote any acts of terrorism for individuals, groups or organisations that support such acts
- Must not spread hatred and intolerance in the community and thus aid in disrupting social and community harmony
- Must exercise caution to avoid causing offense or insulting other faiths or groups, while engaging in constructive debate and discussion.
- Are not permitted to raise or gather funds for any external organisation or cause without express permission from the College.

3.1 Scholars School System Policies and Procedures

Has appropriate policies and procedures in place for the management of events held on its premises. The policies apply to all staff, learners and visitors and clearly set out the requirements for organising any events. The policies and procedures include the following:

- Sufficient notice to allow for checks to be conducted and cancellation to take place, if necessary
- Advance notice of the content of the event, including an outline of the topics to be discussed, insight of any presentations to be done, footage of a broadcast etc.

3.1.1 Literature and Posters

SSS will not allow the display of any promotional materials, including leaflets, flyers and posters on its premises that propagate acts of terrorism for individuals, groups or organisations.

3.1.2 Safety online

The threats of online radicalisation, whether through accessing provocative content or falling victim to online grooming, is a growing concern. This implies that students of HEIs are now vulnerable to harmful online contents, which have the tendency of driving them into radicalisation. Despite the assumptions that learners would not choose to access extremist material through their institution's IT systems, it is always advisable to throw caution to the wind by limiting students access to harmful contents using filtering. For example, instances of online extremist propaganda magazines and websites, containing sophisticated content, can lead to automatic arrest upon downloading. Therefore, it is important to note that education and training institutions can play a pivotal role in safeguarding their learners by blocking access to dangerous or illegal sites and identifying learners who may be curious or susceptible to radicalisation.

3.2 Scholars School System PREVENT Approach

SSS will ensure to:

- Maintain, implement and update IT policy's that include the elements of the Prevent Strategy
- Promote at induction both for staff and learners
- Offer training to all Scholars School System's employees to keep up to date with legislative changes.

3.3 Freedom of Speech/Expression

Freedom of speech or expression are basic human rights that are protected by law. It is important to emphasise that freedom of speech and freedom of expression are not absolute freedoms but freedoms within the law. In lieu of that HEIs have the 'Academic freedom' for an open and honest debate in an academic context with learners pushing the limits of freedom of expression. However, we have a duty to ensure the safety and welfare of our staff, learners and communities are always assured. Therefore, the freedom to express views should be balanced with the freedom from harm. We aim for all our events, activities, and initiatives to prioritise safety, uphold the reputation of Scholars School System, and operate within legal boundaries.

Sometimes an external speaker or their topic of discussion has the potential to go against our conditions for a safe event. We're committed to working together with event organisers and in some cases, external speakers, to make sure that we reach a judgement that is reasonable, informed and within the law.

3.4 Statutory Body Implications

Ofsted conducts inspections under the Common Inspection Framework, where safeguarding is evaluated as part of the leadership and management assessment process. Since September 2014, following Ofsted's involvement in the Trojan Horse case and increased public awareness, their risk-based inspections have placed greater emphasis on promoting fundamental British values and preventing extremism. Consequently, Ofsted is already engaged in these activities and will further enhance their procedures once the legislation comes into effect.

If Ofsted identifies a publicly funded HEI or an independent training provider as inadequate, which includes instances where the institution or provider has failed to comply with this duty, intervention measures will be implemented. However, in the case of independent providers, this could lead to the termination of their contract by the Skills Funding Agency.

3.5 Process of Raising Concerns

A concern that an individual may be vulnerable to radicalisation does not mean that the person is a terrorist. It simply implies that the individual is prone to being exploited by others. In such circumstances, it is referred to as a safeguarding concern. If a member of staff is concerned that someone is being radicalised, then they should discuss their concerns with their line manager and/or the Scholars School System designated safeguarding officers.

Control Panel

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