



Prevent Duty and Policy (including risk assessment and action plan)

1. Introduction

- 1.1. The College is aware of its responsibilities to have due regard to the need to prevent people from being drawn into terrorism, placing a proportionate amount of consideration on its policies and procedures. There is a statutory imperative that we set out the measures we will take in accordance with provisions in the Counter-Terrorism Act 2015 as they apply to higher education providers.
- 1.2. Encouragement of terrorism and/or soliciting support for a proscribed organisation is a criminal offence. Our Prevent Policy sets out our approach to the specific elements and provisions of the Act as they apply to higher education providers, as well as our more general approach to issues around the vulnerability of our staff and students with regard to harassment or radicalisation from any source, and relevant measures which enable our students to learn in safe and intellectually stimulating environments.
- 1.3. In implementing this duty, we are also conscious of our commitments to the freedom of speech, academic freedom, human and equal rights, and the appropriate management of information.

2. Applicability

- 2.1. This policy relates to all staff, students, visitors to the College (including virtually) and those engaged in business on behalf of the College.

3. Leadership, roles and responsibilities

- 3.1. The College takes seriously, at the highest levels, the need to prevent terrorism occurring in our community. This policy has been approved by the Committee College Committee (the Trustees).
- 3.2. The Principal is responsible for providing the Committee with assurance of the College's compliance with the Prevent Duty. The Committee is responsible for approving the Prevent Policy and for approving the College's annual accountability and monitoring return to the Office for Students (delegating responsibility for this annually to the Principal).
- 3.3. The Principal will report the Prevent Risk Assessment and Action Plan to the Committee.
- 3.4. The Principal has been identified as the member of the College leadership responsible for ensuring that the College complies appropriately with the Prevent Duty, in liaison with the DfE Prevent Regional HE/FE Co-ordinator (East Midlands) and other key stakeholders within and beyond the College.
- 3.5. All members of staff and members of the academic faculty should be aware of the College's responsibilities under the Prevent Duty, the measures set out in this policy and comply with them. Members of the College's community who are concerned about a student or member of staff who might be at risk of being drawn into terrorism should report this to the Prevent Lead. See information until Reporting and Referrals.

4. Definitions

- 4.1. Extremism: "the vocal or active opposition to British values, including democracy, the rule of law, individual liberty and mutual respect and tolerance of different faiths and beliefs. We also include in our definition of extremism calls for the death of members of



our armed forces, whether in this country or overseas" (Report of Government Task Force on Extremism).

- 4.2. Radicalisation: "this refers to the process by which a person comes to support terrorism and forms of extremism leading to terrorism. A radicaliser is an individual who encourages others to develop or adopt beliefs and views supportive of terrorism and forms of extremism leading to terrorism" (Prevent Strategy).
- 4.3. Terrorism: an action that endangers or causes serious violence to a person/people; causes serious damage to property; or seriously interferes or disrupts an electronic system. The use or threat must be designed to influence the government or to intimidate the public and is made for the purpose of advancing a political, religious or ideological cause.
- 4.4. Vulnerability: a vulnerable adult is someone aged 18 or over, who is, or may be:
 - in need of community services due to age, illness or a mental or physical disability.
 - unable to take care of themselves, or unable to protect themselves against significant harm or exploitation (Dept of Health 2002).

5. Risk assessment and action plan

- 5.1. The College recognises the risk that College students or staff may be targets for radicalisation and has a Prevent Risk Assessment and Action Plan in place to manage the risks.
- 5.2. The College assesses the current risk to be relatively low, in comparison with the Higher Education sector as a whole due to a number of factors, including:
 - the nature of the provision at the College, with programmes seeking to form and equip students for the practice and leadership of Christian mission and evangelism in the contemporary context; and
 - the small size of the learning community at the College, ensuring that all students have meaningful relationships of pastoral care.
- 5.3. Nevertheless, the College recognises that there is always a risk that College students or staff may be targets for radicalisation.
- 5.4. The Prevent Risk Assessment and Action Plan is consolidated into the College's overarching Risk Register.
- 5.5. Day-to-day management of the Risk Assessment and Action plan is provided by the Principal, supported by other College Officers. The Risk Assessment and Action Plan is reviewed by the Business Committee throughout the year, and monitored by the Cliff College Committee.

6. Working in partnership

- 6.1. The College places emphasis on working in partnership with external bodies and agencies to ensure we can provide a safe environment and to share information and best practice.
- 6.2. The College is part of the East Midlands Regional Prevent Group to share and receive information.
- 6.3. The College is aware of the [Channel](#) process and of the opportunities for informal and formal sharing of information with relevant authorities. We will use these when we consider it is necessary and appropriate to do so in the interests of preventing people from being drawn into terrorism.

7. Staff training and awareness



7.1. The College recognises that the effective operation of this Prevent Policy requires appropriate staff, contractors, and individuals within the governance of the College to be trained.

7.2. The College operates a tiered approach to training as set out below.

Level	Training Required	Applicable to	Frequency
One	Prevent Duty Awareness Course Prevent Duty Refresher Course	All staff (including sessional faculty members)	On induction to role Refresher every two years
Two	Prevent Duty Referrals Course	Prevent Lead and all members of the Safeguarding Team	On induction to role Refresher every two years
Three	The leadership challenge: the Prevent Duty for governing bodies and senior leaders in higher education (HE)	All members of the Cliff College Committee	On induction to role Refresher every two years

7.3. The College recognises that our academic faculty and student welfare team have the most contact with students day-to-day and are therefore more likely to identify where there may be a cause for concern. As a result, they will be provided with Prevent updates at Academic Board meetings each semester.

8. Welfare and pastoral support

8.1. The College has in place a range of pastoral support available to all students at the College, including:

- Togetherall, an online mental health and wellbeing service
- Personal tutors
- Student welfare and counselling provision

8.2. Where a student, or member of staff, is identified as being at risk in any way, including someone who has been drawn into expressing views that relate to harming themselves or others, are contradictory to the College's Dignity at Study and Work Policy, or constitute harassment, actions will be taken to ensure that individual can access support.

8.3. The College may also take action against the student in accordance with the Conduct and Discipline or Fitness to Study Policies. Where appropriate this may include external referrals.

9. Safety online

9.1. The College has in place an IT and Computer Use Policy which applies to all users of College IT facilities. We set out in that policy a range of activities that would be of concern to us including issues that arise from the University's statutory duty under the Counter Terrorism and Security Act 2015. This includes the creation, download, storage, transmission or display of material that promotes or incites racial or religious



hatred, terrorist activities or hate crime; or instructional information about any illegal activities.

10. External speakers and events

- 10.1. The College actively manages risks around external speakers at events. This includes events run by the College (College owned events) and branded events taking place away from the College or virtually, seeking to maintain a safe environment where freedom of speech, expression and academic debate can exist, and where the College can fulfil its charitable purposes. Further details of the processes for assessing and managing the risks associated with external speakers and events can be found in the External Speakers and Events Policy.

11. Freedom of speech and academic freedom

- 11.1. The College is committed to providing staff and students with an environment where freedom of speech (within the law) is protected but balanced with the need to ensure that the College is free from harm and hatred. The College maintains its responsibility to comply with the Higher Education (Freedom of Speech) Act 2023, as set out in the College's Code of Practice on Freedom of Speech. This must co-exist with the due regard to prevent people from being drawn into terrorism.
- 11.2. The approval of external speakers should not be denied solely on the grounds of policy or belief.

12. Causes of concern

- 12.1. Radicalisation can take place face-to-face or online. Whilst the risk of radicalisation is relatively low, a small number of students may be vulnerable to a range of radicalising causes, including religious radicalisation or far-right politics. Whilst children and vulnerable adults may be most at risk of radicalisation, students and staff who do not fall into these categories may also be at risk.
- 12.2. There is no set pattern to radicalisation, but there are some changes in behaviour that may prompt concerns that an individual is at risk of being radicalised, including:
- Noticeable changes in peer group or religious practices;
 - Sudden or increased isolation from family/social group;
 - Indication of the vulnerable person being insistently befriended by individuals or groups with radical views;
 - Use of extremist or hate terms to exclude others or incite violence;
 - Extremist political activism or the accessing, possession or distribution of materials advocating extremist views;
 - An undertone of grievance or "us and them" language or behaviour;
 - Increased emotional instability, and/or cultural or social anxiety;
 - Possession of suspicious items (e.g., large amounts of money, multiple passports, unusually large amounts of everyday items that could be used to make incendiary devices).
- 12.3. There may be many reasons for such changes, other than potential radicalisation, which is why a cause for concern and reporting approach should be adopted, as this enables the relevant services within and outside the College to identify the individual's needs and vulnerabilities.

13. Reporting and referrals

- 13.1. **If there is an immediate concern where a person's physical wellbeing is under threat the correct referral process is to call 999 and then inform the College Prevent Lead – the Principal – at the earliest opportunity.**
- 13.2. The Prevent Lead is the single point of contact for operational delivery of Prevent and is responsible for making all external referrals under our Prevent Policy.
- 13.3. Where a staff member or student has concerns relating to the radicalisation of an individual, they should, where appropriate, first check their concerns, either with others who might have noticed something (such as Personal Tutors, colleagues or members of the College's Safeguarding Team), or speak to the person directly.
- 13.4. Where concerns persist, the staff member or student should raise their concerns with the Prevent Lead, by emailing principal@cliffcollege.ac.uk.
- 13.5. Where a member of staff or student is not sure whether they should report a concern, they can contact the Safeguarding Team or the Prevent Lead for advice.
- 13.6. The Prevent Lead will assess the concerns raised and determine whether to make an external referral to the College's Prevent partners, local authorities or the police. All concerns raised will be treated securely, sensitively, and so far as is possible, confidentially.
- 13.7. The Prevent Lead may seek advice from or make a referral to:
 - Regional DfE Prevent Coordinator for East Midlands
 - Channel
 - the National Prevent Police Advice Line

14. Ongoing monitoring

- 14.1. This policy will be reviewed at least annually, as part of the annual policy review, to determine it is still relevant, it is in line with any changes made to legislation and that it is in effective operation at the College.

Prevent Risk Assessment and Action Plan

The following threats have been considered as part of this risk assessment, being those currently identified as present within the wider sector:

- Anarchist extremism
- 'Single issue' extremism - including environmentalist and animal rights movements that advocate violence
- Right Wing Extremism
- Islamist Extremism
- Incel-related
- Left Wing Extremism
- Mixed/Unstable/Unclear ideologies, including fixations on violence
- Northern Ireland-related terrorism

	Risk	Inherent risk likelihood	Inherent risk impact	Inherent risk rating	Owner	Control Framework	Residual risk likelihood	Residual risk impact	Residual risk rating	ACTIONS
	'PREVENT' RISK									
PD1	Insufficient understanding of personal and institutional responsibilities in relation to the Prevent Duty	Likely	Significant	Medium High	Prevent Lead	Use of Prevent Duty awareness training for governing body and staff, embedded into induction material	Unlikely	Moderate	Low Medium	<ul style="list-style-type: none"> • Register of online training undertaken • Training session with governing body

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PD2	Insufficient awareness of live risks and factors drawing people into radicalization and terrorism	Possible	Significant	Medium High	Prevent Lead	Engagement with East Midlands Regional Prevent Co-ordinator, through regular email briefings	Unlikely	Moderate	Low Medium	<ul style="list-style-type: none"> Annual briefing to trustees Briefing to Academic Board each semester
PD3	Students drawn into radicalisation due to exposure to teaching and learning	Unlikely	Moderate	Low Medium	Prevent Lead	<p>Tutors approach contentious topic areas with care.</p> <p>Personal Tutor, Student Welfare and Safeguarding frameworks in place for early identification and intervention</p>	Very unlikely	Minor	Low	<ul style="list-style-type: none"> Briefing safeguarding and welfare teams
PD4	Speakers and/or organisations using the College contravene the Prevent Duty	Possible	Significant	Medium High	Prevent Lead & Business Committee	<p>External Speaker and Event Policy, with due diligence form.</p> <p>Statement of alignment with the College's charitable purposes in relation to speakers, events and bookings</p>	Very Unlikely	Moderate	Low Medium	<ul style="list-style-type: none"> Embedding new due diligence form

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PD5	Students on placement are drawn into/associated with radicalisation and/or terrorism due to influence of partner organisations, or while in their context	Possible	Significant	Medium High	Prevent Lead; Placement Coordinator	Prevent Policy shared as part of all placement agreements; active monitoring of students' welfare during placements	Unlikely	Moderate	Low Medium	<ul style="list-style-type: none">Placement Coordinator to be included in Referrals training
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