

PREVENT AND COUNTER-TERRORISM POLICY

1. Purpose & Scope

This policy sets out how the College prevents people from being drawn into terrorism and supports those who may be susceptible to radicalisation. It applies to all learners, apprentices, staff, visitors, employer forum representatives, contractors and employers/placement providers, and to all sites, online environments and work-based settings.

2. Legal & Regulatory Framework

- Prevent Duty Guidance (England & Wales, 2023) – statutory from 31 December 2023
- Counter-Terrorism and Security Act 2015 (section 26 duty)
- Keeping Children Safe in Education (KCSIE) 2025 – online harms, misinformation/disinformation, filtering & monitoring roles
- Online Safety Act 2023 – safer systems and processes for online environments; Ofcom codes and enforcement
- Ofsted Education Inspection Framework (EIF) 2025–26 – safeguarding binary judgement (met/not met) and inclusion expectations
- Working Together to Safeguard Children 2023 and local Safeguarding Children Partnership (LSCP) procedures
- Equality Act 2010 / Public Sector Equality Duty (PSED)
- UK GDPR and Data Protection Act 2018

3. Definitions

Terrorism: Action or threat intended to influence government or intimidate the public for a political, religious, racial or ideological cause (as defined in relevant legislation)

Extremism: Vocal or active opposition to fundamental British values, including democracy, the rule of law, individual liberty, mutual respect and tolerance of different faiths and beliefs; also calls for death of members of the armed forces

Radicalisation: The process by which a person comes to support terrorism and extremist ideologies

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Reducing Permissive Environments: Prevent Duty 2023 theme requiring leaders to reduce spaces and opportunities in which extremist ideologies or conducive factors can thrive

4. Policy Statement

The College promotes a safe, inclusive environment that challenges extremist and hateful ideas, protects freedom of speech within the law, and fosters critical thinking. We work proactively with partners to reduce risks, provide proportionate interventions, and support learners and staff to remain safe online and offline.

5. Roles & Responsibilities

Employer Forum: Approves policy; receives termly Prevent reports (risk, referrals, training, filtering/monitoring, events/speakers); ensures sufficient resources and scrutiny.

Principal/CEO: Leads Prevent culture; ensures Prevent is integrated with safeguarding, equality and inclusion; ensures training and assurance are in place.

DSL/Prevent Lead (SPOC): Leads risk assessment, action plan, referrals (including Channel), partner liaison, records, and staff guidance; co-chairs termly Prevent review with IT.

Deputy DSLs: Support referral management, casework and training; act in DSL absence.

IT Lead: Implements filtering & monitoring in line with KCSIE and Online Safety Act; documents risk appetite, what is blocked/allowed and why; produces termly reports with DSL.

Curriculum & Quality Leads: Embed Prevent, British values, critical thinking and digital literacy (misinformation/disinformation) into curriculum and tutorials; gather learner voice.

Events Lead: Operates external speaker/events risk assessment and approval process; maintains room-booking controls.

HR Lead: Ensures safer recruitment, ongoing suitability and low-level concerns; ensures staff understand Prevent responsibilities.

All Staff, Volunteers and learners: Complete training; remain vigilant; recognise, record and report concerns promptly; model respectful debate and challenge.

Employers/Placement Providers: Provide safe environments; report concerns immediately; comply with the College's Prevent requirements in agreements.

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6. Prevent Risk Assessment & Action Plan

- We maintain a College Prevent Risk Assessment and Action Plan that:
- Is reviewed annually (and sooner if risks change) and approved by the employer forum
- Draws on local threat information (e.g., Prevent Coordinator, police/local authority, LSCP, CTLP extracts) and national themes
- Covers on-campus, online and work-based learning risks, including emerging ideologies e.g. misogynistic extremism, misinformation/disinformation, and AI-enabled harms
- Includes controls, owners, deadlines and measures of effectiveness
- Is monitored termly with progress reported to SMT and the employer forum

7. Filtering, Monitoring & Online Safety

We operate appropriate filtering and monitoring (F&M) systems to help protect users from extremist and harmful content, alongside education and behaviour expectations. We will:

- Document our risk appetite and rationale for F&M configurations, including categories blocked/allowed and exceptions
- Define roles of DSL (safeguarding oversight), IT Lead (technical operation), and governance (assurance)
- Conduct at least annual F&M reviews and termly DSL–IT reviews, with actions logged and followed to closure
- Train staff responsible for interpreting alerts and escalation routes
- Assess OSA-related duties for college-run online services and keep evidence of actions taken

8. Training & Capability

- All staff complete Prevent induction and at least annual updates; Employer representatives receive Prevent oversight training
- Content includes local threats, vulnerability factors, misinformation/disinformation, online radicalisation, AI-enabled risks, and filtering/monitoring roles
- Specialist training for DSL/Deputies, IT Lead, events approvers and employer-facing teams
- Training records are maintained and sampled during assurance reviews

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9. Recognising Concerns & Referral Pathway

Staff should recognise indicators of concern (behaviours, associations, online activity, expressed views) and follow the steps below. If someone is in immediate danger, call 999.

- Recognise & Record – Note factual observations, times/dates, online handles/URLs, and any context. Do not investigate
- Report – Share concerns immediately with the DSL/Deputy via the safeguarding reporting system.
- DSL Assessment – DSL considers proportionality, consults with Prevent partners where appropriate, and records rationale
- Referral – Where appropriate, DSL makes a Prevent/Channel referral via agreed local pathways; parents/carers are engaged where suitable
- Support – The College provides proportionate pastoral/educational support and monitors impact

10. Partnership & Information Sharing

We work with Prevent Coordinators, police, local authority, LSCP/MASH, Channel Panel and other partners. We share information lawfully and proportionately to safeguard individuals, using UK GDPR lawful bases (public task, vital interests, legal obligation, substantial public interest as relevant).

11. Curriculum, Inclusion & British Values

Prevent is taught within an inclusive curriculum that promotes British values and respectful debate. We develop digital literacy and critical-thinking skills to challenge misinformation/disinformation and extremist narratives. Content and delivery are adapted to meet diverse learner needs and reduce barriers to participation.

12. External Speakers & Events (Reducing Permissive Environments)

We operate an approval and risk assessment process for events and external speakers that:

- Assesses topic, speaker background, audience, materials, proposed mitigations and supervision
- Balances freedom of expression within the law against safeguarding and Prevent duties
- Requires proportionate controls (e.g., charring, content review, audience management) or refusal where risks cannot be mitigated

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- Samples at least 10 events per term for compliance and reports findings to governance

13. Work-Based Learning & Employers

Placement agreements outline employer responsibilities for Prevent and safeguarding, reporting routes and escalation expectations. College staff conduct risk-based checks and respond swiftly to concerns from workplaces.

14. Managing Allegations & Low-Level Concerns

Concerns about staff behaviour are managed under the Allegations and Low-Level Concerns procedures, including LADO referrals where thresholds are met, and appropriate HR processes. Prevent-related allegations are recorded and reviewed for patterns and learning.

15. Emergency Preparedness & Site Security

The College maintains arrangements for emergency response e.g. lockdown/evacuation, invacuation, communications and post-incident support. Protective security measures and visitor controls are reviewed periodically with partners.

16. Records, Data Protection & Retention

Prevent concerns are recorded securely, with access restricted on a need-to-know basis. We keep accurate, factual records (chronologies, actions, outcomes) and retain them according to the College Retention Schedule and legal requirements.

17. Monitoring, Assurance & Review

- Termly Prevent report to governance (training coverage, risk assessment updates, F&M reviews, referrals/themes, events sampling, curriculum/learner voice)
- Annual self-assessment against Prevent Duty 2023 and Ofsted expectations; external peer review every 18–24 months where feasible
- Policy reviewed at least annually, or sooner following legislative change or significant incident

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Appendix A – Key Contacts

DSL/Prevent Lead (SPOC):

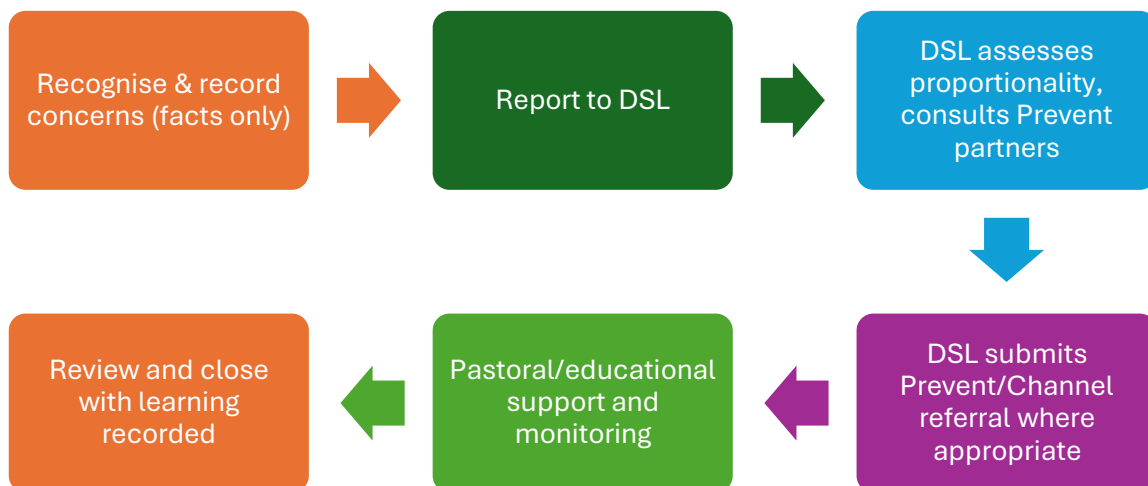
- Barbara Cooper - 07803 903047 - bcooper@caw.ac.uk

Deputy DSLs:

- Claire Defries - 01480 422060 - cdefries@caw.ac.uk
- Deborah Gould - 01480 422060 - dgould@caw.ac.uk
- Ruth Nield - 01480 422060 - rniel@caw.ac.uk
- Mel Young - 01480 422060 - myoung@caw.ac.uk

Police (non-emergency 101 / emergency 999)

Appendix B – Prevent Referral Flow (Quick Guide)



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Appendix C – Filtering & Monitoring Review Checklist (Annual)

- Risk appetite documented; categories blocked/allowed; exceptions logged
- Leadership and governance understand F&M arrangements
- Alert triage roles and escalation defined; training completed
- Termly DSL–IT reviews completed; actions closed
- System effectiveness tested (sampling) and reported to governance
- Online Safety Act duties considered for college-run online services; Ofcom guidance referenced

Appendix D – Prevent Risk Assessment Headings

- Context and local threat picture
- Learner cohort risks (on-site/online/workplace)
- Staff capability and training coverage
- F&M controls and online education
- Events/speakers and site access
- Curriculum and learner voice
- Equality/inclusion impacts and reasonable adjustments
- Controls/mitigations, owners, timelines, assurance measures

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1. Aims and Implementation

This Policy has been assessed for equality impact by Human Resources.

The purpose of this assessment is to ensure the policy does not unlawfully discriminate against any individual or group and supports the organisation's commitment to equality, diversity and inclusion.

2. Evidence and Data

Barriers could result in		
Equality Group	Impact	Assessment
Age	Positive	Policy includes safeguarding protections aligned with KCSIE, supporting younger learners and vulnerable individuals while applying proportionate measures across all age groups.
Disability	Neutral/ Positive	Recognises vulnerability factors including mental health and additional needs. Safeguarding and support mechanisms help mitigate risks, though care must be taken to avoid misinterpretation of behaviours.
Gender Reassignment	Neutral/ Positive	Policy promotes inclusion and respect. Safeguarding processes protect individuals from harm; application must remain proportionate and free from bias.
Marriage and Civil Partnerships	Neutral	No specific impact identified. Policy applies equally regardless of marital status.
Pregnancy and Maternity	Neutral	No adverse impact identified. Safeguarding and support processes apply equally to all individuals.
Race	Neutral/ Positive	Policy includes safeguards to prevent discrimination and emphasises proportionality. Ongoing monitoring is required to ensure no disproportionate impact on racial or ethnic groups.
Religion or Belief	Neutral/ Positive	Policy explicitly protects freedom of belief within the law while challenging extremism. Care is required to ensure individuals are not unfairly targeted based on faith.
Sex and Sexual Orientation	Neutral/ Positive	Policy promotes a safe environment free from harassment and discrimination. Safeguarding processes support all individuals equally

3. Assessment of Impact

No adverse impact has been identified. The policy is considered to have a neutral and/or positive impact across protected characteristics.

The policy will be monitored to ensure no disproportionate impact occurs and reviewed if required.

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Review Arrangements and Version Control:

This version of The College of Animal Welfare's Prevent and Counter-Terrorism Policy replaces all previous versions. This document is subject to regular revision and maintained electronically by its owner. Electronic copies are version controlled. Printed copies are not subject to this control. The College of Animal Welfare will review this policy regularly as part of internal continuous improvement processes and will revise it as and when necessary, in response to changes in our practices, actions from the regulatory authorities or inspections, changes in legislation, or trends identified from previous situations.

Documented changes from previous version	
Section	New document
Equality Impact Assessment	New section

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