Prevent Policy and Procedure

Ownership Details and Review Schedule of Policy

Effective from	13 February 2026
Review cycle	1 Year
Next Review Due Date	13 February 2027
Policy owners	Principal
Approving Body	Board of Governors
Lead Contact	Charlotte Fletcher-Morgan c.fletcher-morgan@sirm.ac.uk
Applicable to	All staff, students, applicants, contractors, volunteers, partners, external speakers, visitors and any other individuals engaged with SIRM College activities, premises or online environments.
Relevant/Applicable OfS Conditions of Registration/requirements	B1, B2, B4, C1, E2, E3
Other relevant / applicable legislation/requirements	UK Quality Code for Higher Education OIA Good Practice Framework Equality Act 2010 Data Protection Act 2018 Children Act 1989 and Children Act 2004 Care Act 2014 Working Together to Safeguard Children 2023 Counter-Terrorism and Security Act 2015

DOCUMENT CONTROL

Date	Review & Revision	Owner	Version

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Table of contents

1. INTRODUCTION 1
2. SCOPE 1
3. LEGAL AND REGULATORY CONTEXT 2
4. GOVERNANCE AND ACCOUNTABILITY 2
5. GOVERNANCE STRUCTURE AND REPORTING ROUTE 3
6. PREVENT RISK ASSESSMENT AND ACTION PLAN 4
7. STAFF TRAINING AND AWARENESS 4
8. MANAGING CONCERNS AND REFERRALS 4
9. ONLINE SAFETY AND IT SYSTEMS 5
10. EXTERNAL ENGAGEMENT 5
11. STUDENT SUPPORT AND CAMPUS ENVIRONMENT 5
12. COMMUNICATION AND AWARENESS RAISING 6
13. DATA MANAGEMENT AND CONFIDENTIALITY 6
14. MONITORING, REVIEW AND ASSURANCE 6
15. RELATED POLICIES 6
16. SUPPORTING DOCUMENTS AND COMMUNICATION TOOLS 6

Prevent Policy

1. Introduction

SIRM College (SIRM) is committed to providing a safe, inclusive and supportive environment where students and staff can learn and work free from harm. As part of our wider safeguarding responsibilities, the College must comply with the Prevent Duty under the Counter Terrorism and Security Act 2015.

The duty requires higher education providers to have due regard to the need to prevent people from being drawn into terrorism or extremist activity. At SIRM, Prevent operates as a safeguarding function. Its focus is supporting individuals who may be vulnerable, promoting early help and enabling timely referrals where appropriate.

This policy sets out how the College meets its statutory responsibilities, how concerns are managed and how Prevent integrates with our governance, safeguarding and risk management arrangements. It should be read alongside the Safeguarding Policy, Digital and IT Acceptable Use Policy, Visiting Speakers and External Events Policy, Multi Faith and Prayer Space Policy, Student Complaints Procedure and the Prevent Risk Assessment and Action Plan.

Prevent at SIRM operates as part of the College's wider safeguarding framework and is not treated as a standalone function. The College adopts a proportionate, risk-based approach to managing concerns, ensuring that responses are appropriate and centred on the welfare and rights of the individual. Most concerns are managed through internal support, with external referrals made only where appropriate.

2. Scope

This policy applies to all students, staff, contractors, volunteers, external speakers and visitors at SIRM, including individuals engaged in online learning or off-site activity.

It also applies to partners involved in delivering SIRM provision. Prevent responsibilities sit within a wider safeguarding and wellbeing context and operate alongside the College's commitment to equality, inclusion and freedom of expression.

Although SIRM College does not ordinarily admit students under the age of 18, the College recognises that Prevent-related concerns may arise in relation to

any individual engaging with the College, including applicants, visitors, or those involved in outreach or partnership activity.

Where a Prevent-related concern involves a person under the age of 18, it will be managed in accordance with the Safeguarding Policy and relevant child safeguarding procedures, including referral to appropriate external agencies where required.

3. Legal and Regulatory Context

The Prevent Duty is set out in sections 26 to 31 of the Counter Terrorism and Security Act 2015 and explained in the Prevent Duty Guidance for Higher Education Providers. SIRM is required to demonstrate appropriate governance, risk assessment, training, reporting and communication arrangements, alongside mechanisms for managing visiting speakers and maintaining online safety.

As a registered higher education provider regulated by the Office for Students, the College must also ensure that its governance, management and accountability arrangements are sufficient to discharge Prevent responsibilities. These requirements sit within OfS Conditions E2 and E3.

SIRM remains committed to the principles of freedom of expression under the Education No. 2 Act 1986. Prevent does not override these duties but operates alongside them to ensure that debate and discussion take place within a safe and respectful environment.

In implementing the Prevent Duty, the College applies a proportionate and risk-based approach that balances its safeguarding responsibilities with its legal duties relating to freedom of speech and academic freedom. Decisions relating to events, speakers, or referrals are made on the basis of risk, legality, and proportionality.

4. Governance and Accountability

The Board of Governors is the accountable body for Prevent. The Board approves this policy, the Prevent Risk Assessment and Action Plan and the Prevent Annual Accountability Return submitted to the Office for Students. The Board receives regular assurance through its committee structure and maintains oversight of Prevent risks as part of its regulatory responsibilities.

The Principal holds overall institutional accountability for safeguarding and Prevent and acts as the Prevent Single Point of Contact. The Principal oversees the implementation of this policy, ensures that concerns are managed appropriately, maintains relationships with external agencies and chairs the Prevent and Safeguarding Working Group.

Operational responsibility for the management of safeguarding concerns, including Prevent-related concerns, sits with the Designated Safeguarding Lead, who leads day-to-day case management, risk assessment, and coordination of support and referrals.

Designated Safeguarding Leads DSLs provide day to day safeguarding and Prevent support for their respective campuses. They receive and assess concerns, provide advice to staff and students and escalate to the Principal where appropriate.

All safeguarding and Prevent-related concerns must be reported promptly to the Designated Safeguarding Lead. Where appropriate, the Designated Safeguarding Lead will escalate matters to the Principal, particularly in cases involving Prevent, significant risk, or where institutional oversight is required.

The Head of Student Support and the Head of HR may become involved in cases relating to students or staff respectively, where the nature of the concern requires broader safeguarding or organisational involvement. The Chief Executive may be consulted for serious or complex matters.

5. Governance Structure and Reporting Route

Operational oversight of the Prevent Duty is maintained through the Prevent and Safeguarding Working Group, which monitors training completion, reported concerns including nil returns, external engagement and progress against the Prevent Risk Assessment and Action Plan.

Prevent forms part of the College's wider governance and assurance framework and is scrutinised through the appropriate committees as part of routine compliance, quality and risk reporting. Formal accountability is retained by the Board of Governors, which approves the Prevent Policy, the Prevent Risk Assessment and Action Plan, and the annual Prevent accountability return.

Prevent oversight operates through an established governance cycle:

→ Prevent and Safeguarding Working Group operational monitoring

→ Quality and Compliance Committee - scrutiny and assurance

→ Finance, Audit and Risk Committee - oversight of risk and controls

→ Board of Governors - accountability and approval

6. Prevent Risk Assessment and Action Plan

SIRM maintains a formal Prevent Risk Assessment and Action Plan that is reviewed annually and approved by the Board. The plan addresses staff training, external engagement, risk identification, governance, reporting routes, managing concerns, online safety and visiting speakers.

Progress is monitored throughout the year by the Prevent and Safeguarding Working Group. The plan links to SIRM's broader risk management processes and is reviewed by the Finance, Audit and Risk Committee prior to Board approval.

7. Staff Training and Awareness

All staff are required to complete mandatory Prevent training as part of induction, with periodic refresher training thereafter. Completion rates are monitored and reported through the Prevent and Safeguarding Working Group and relevant governance committees. Additional role-specific training is provided to Designated Safeguarding Leads and senior staff with Prevent responsibilities.

8. Managing Concerns and Referrals

Not all safeguarding or Prevent concerns will require referral to external agencies. Decisions will be made on a case-by-case basis following appropriate risk assessment. The College adopts a proportionate, risk-based approach, ensuring that responses are appropriate to the level of risk and prioritise the welfare, rights, and best interests of the individual.

Concerns about potential radicalisation, extremist influence or vulnerability should be raised promptly with a DSL or directly with the Principal. Staff are not expected to assess risk or investigate. Their role is to notice, check and share concerns so that the appropriate safeguarding response can be taken.

Concerns are reviewed sensitively and proportionately. The College may seek external advice where appropriate, including from Local Authority Prevent Leads, the police Prevent Team or Channel. Only a very small number of concerns require formal referral. Support for individuals is typically provided through dialogue, pastoral support or other internal mechanisms.

SIRM maintains a confidential Prevent concerns register, including formal recording of all concerns and confirmation of nil return periods where no concerns are identified, in line with data protection legislation.

9. Online Safety and IT Systems

SIRM recognises that online environments can present risks related to extremist or harmful content. To reduce these risks, the College operates a range of filtering and monitoring systems, including:

- Microsoft Defender XDR
- content filtering by keyword, category and digital content type
- firewall based IP filtering
- DNS and HTTPS filtering
- enforced SafeSearch on College networks

Students and staff must comply with the IT and Digital Acceptable Use Policy. Attempts to bypass filtering or access harmful content may lead to disciplinary action. The effectiveness of filtering and monitoring systems is assessed through periodic checks.

The effectiveness of these controls is subject to periodic review and audit, with outcomes reported through the College's governance and risk management framework.

10. External Engagement

SIRM maintains professional relationships with relevant external agencies, including Local Authority Prevent Coordinators, police Prevent Teams, Channel Panels and partner universities. The College participates in Prevent reviews and provides information required as part of the Office for Students' Prevent monitoring processes.

Visiting Speakers and External Events

The College manages visiting speakers through the Visiting Speakers and External Events Policy, which ensures that external events are lawful, safe and appropriately risk assessed, with Prevent considerations embedded proportionately alongside duties relating to freedom of speech, safeguarding and equality.

Freedom of expression is supported within legal parameters, and higher risk events may require additional safeguards or may be declined if they cannot be appropriately mitigated.

11. Student Support and Campus Environment

Prevent sits within the College's broader commitment to safeguarding and wellbeing. Students can access support from DSLs, academic staff or the

Head of Student Support. As concerns often relate to wider wellbeing issues, students may be signposted to internal or external services as appropriate.

SIRM promotes respectful dialogue and inclusive practice and provides access to a Multi Faith and Prayer Space under the relevant policy.

12. Communication and Awareness Raising

Prevent information is made available through induction, posters displayed on campus and materials such as the Prevent on a Page summary and the One Minute Guide. Students and staff are reminded of reporting routes and support options throughout the year

13. Data Management and Confidentiality

Information relating to Prevent concerns is handled in accordance with the Data Protection Act 2018 and UK GDPR. Records are stored securely and retained only for as long as necessary. Information is shared on a need to know basis and only with those who are responsible for managing the concern or required by law.

14. Monitoring, Review and Assurance

The Prevent and Safeguarding Working Group monitors compliance with this policy and reviews emerging risks and issues. An annual Prevent Report is submitted to the Board, alongside the Prevent Accountability Return required by the Office for Students. The policy is reviewed annually and updated as necessary to reflect legislative or regulatory changes.

15. Related Policies

- Safeguarding Policy
- IT and Digital Systems Acceptable Use Policy
- Visiting Speakers and External Events Policy
- Multi Faith and Prayer Space Policy
- Student Complaints Procedure
- Reportable Events Policy
- Prevent Risk Assessment and Action Plan

16. Supporting Documents and Communication Tools

The College uses a small number of supporting documents to aid staff and student understanding of the Prevent Duty. These documents complement

this policy and statutory guidance and provide accessible summaries of Prevent at both national and institutional level

16.1 Appendix One: Understanding Prevent at SIRM One Minute Guide

The One Minute Guide is a SIRM-specific internal resource for staff. It provides a concise, practical reference to the key principles of Prevent in the context of SIRM's safeguarding arrangements, including how to recognise potential vulnerabilities, the Notice, Check, Share approach, and the internal reporting routes to Designated Safeguarding Leads and the Prevent Single Point of Contact. The Guide is used within staff induction and refresher activity and supports consistent, proportionate safeguarding responses. It does not replace this policy or statutory guidance, but complements them by translating requirements into a practical SIRM context

Radicalisation and preventing extremism

A One-Minute Guide

WHAT IS RADICALISATION?

Radicalisation is a safeguarding issue and refers to the process by which a person comes to support terrorism and other forms of extremism that can lead to terrorism. Whilst no single factor is usually enough to radicalise someone into terrorism, several factors together can create conditions under which terrorism can occur.

There is no single profile of what might drive someone to become radicalised, or what an extremist or terrorist looks like. Individuals involved in extremist activity can come from a range of background and experiences, although there are some common factors which can make someone more vulnerable to becoming radicalised.

Radicalisation is a process that is different for everyone. Radicalisation can occur as a gradual process over a long period, or within a very short timeframe.

CONTRIBUTING FACTORS TOWARDS RADICALISATION

Some of the factors that can lead to an individual becoming radicalised are the same as those which make vulnerable individuals susceptible to activities such as drug misuse, sexual exploitation, gangs and alcohol abuse. It is unlikely (but not impossible) that a single factor alone will lead a person to become radicalised. Such factors are:

- bullying
- isolation
- mental health difficulties
- bereavement
- drug/alcohol misuse
- lack of self-esteem
- the need for belonging
- looking for a cause or reward
- a sense of injustice or grievance
- a desire for power, respect or and/or status
- access to extremist material online
- being easily influenced/lack of clear sense of self

WHAT BEHAVIOURS MIGHT BE DISPLAYED BY SOMEONE WHO IS BEING RADICALISED?

A change or changes in behaviour can indicate that someone may be being radicalised, or may be at risk of radicalisation, although it is important to remember there may be other underlying reasons for behaviour changes and that context and proportionality are very important. Concerning behaviour changes might be:

- Changes in mood and/or patterns in behaviour, language/use of words
- Possession of violent extremist literature (including online/digital content)
- Use of language or speech that promotes hate
- The expression of extremist views or sympathy to extremist causes
- Seeking to engage or recruit others to extremist ideologies, extreme groups, literature/content, online social media groups or marches, or spending time with those who seek to engage or recruit
- Preaching/imposing views on others; outbursts of anger
- Isolating themselves; secretive behaviour; fixating on a new subject or person

WHAT SHOULD I DO IF I HAVE A CONCERN?

It's important to remember that the examples given in this guide are non-exhaustive, and the context of an individual is as important as the context in which the behaviours stem from and/or occur. The examples given should not be seen as an exhaustive list, but rather, an indication of worrying behaviours that could make someone vulnerable.

If you have a concern that someone is being radicalised or may be at risk of it, you should speak to a member of Safeguarding staff. SIRM College Safeguarding staff are:

***Ilford** (Maheen Javed M.Javed@sirm.ac.uk ***Leicester** (Kholah Dar k.dar@sirm.ac.uk) ***Principal** (Charlotte Fletcher-Morgan c.fletcher-morgan@sirm.ac.uk) the PREVENT Single Point of Contact)

NOTICE - CHECK - SHARE

If you **notice** a change in an individual that could make them vulnerable to being radicalised or exploited, **consult** one of the above-named staff and **follow** the College Safeguarding Policy. You can also consult the College Prevent Policy for information.

ABOUT PREVENT

The PREVENT programme is part of the Government's Counter Terrorism Strategy and aims to safeguard people from becoming terrorists or supporting terrorism. In line with our statutory duty, SIRM College works together with partnership agencies to stop people becoming involved in or supporting terrorist activity. Under the PREVENT Duty all public sector agencies have a responsibility to ensure their staff and volunteers have a good understanding of Prevent and their responsibilities towards individuals, groups or families they are working with.

For further information on the PREVENT Duty and for information on Prevent training and resources available contact the PREVENT SPOC, who is the Principal.

Channel Programme

Channel is a voluntary programme designed to safeguard vulnerable individuals from being drawn into extremist or terrorist behaviour. Channel works in a similar way to existing multi-agency partnerships for vulnerable individuals. Channel is chaired by the local authority and works with multiagency partners to collectively assess the risk to an individual, decide whether an intervention is necessary and work with partners to develop an appropriate support package for each referral.

For further information on Channel and how SIRM College engages with it, please see the College PREVENT Policy.

Further information on PREVENT

For further information you can read the national guidance:
The Prevent Strategy
The Prevent Duty
Channel Programme

You can also read the UK Government PREVENT duty guidance in the Counter-Terrorism and Security Act 2015