Commonwealth College of Excellence

Prevent Policy

Version	Date	Changes	Reason for Changes	Author/ Reviewer	Next Review
v3.2	January 2025	The Local, National, and Regional Threats and Risks section has been added. Also, Implementation of Prevent Trainings section has been included.	Feedback from OfS Prevent Team	Mohammad T Islam (Head of Academics & Quality Control)	January 2026/ As required
v3.3	August 2025	The Prevent risk assessment now considers national (UK), regional (London), and local (Barnet) risks, and is informed by input from external partners including the Police, Social Workers, Local Council, and the local Barnet community. A clear process for updating and recording risks, including timing and mitigation planning, has been established. In addition, subscription to the DfE regional coordinator's newsletters is ensured for being informed of emerging risks.	To Address OfS Action Plan	Mohammad T Islam (Head of Academics & Quality Control)	August 2026/ As required
v3.4	August 2025	The updated Prevent policy reflects recommendations provided by the OfS Prevent Team and includes changes such as clarifying terminology (e.g., "susceptibilities"), refining the scope language, accurately describing referral processes, and emphasising consultation with external partners prior to formal referrals.	Feedback from OfS Prevent Team	Mohammad T Islam (Head of Academics & Quality Control)	August 2026/ As required

1.0 Purpose

The purpose of this Prevent Policy is to set out the College's approach to fulfilling its statutory duties under the **Prevent Duty**, ensuring compliance with the *Counter-Terrorism and Security Act 2015* and relevant guidance from the **Department for Education (DfE)** and the **Office for Students (OfS)**.

This policy provides a clear framework for:

- Identifying and managing risks of **radicalisation** and **extremism**;
- Ensuring that students and staff are **protected from harm**;
- Supporting **academic freedom** and **freedom of speech** while maintaining a safe learning environment;
- Establishing clear **referral pathways** and promoting **multi-agency collaboration**;
- Demonstrating compliance to the **OfS** through systematic monitoring and review.

2.0 Scope

This policy applies to:

- All students enrolled at the College;
- All staff, including visiting lecturers, contractors, volunteers, and guest speakers;
- All College activities, whether on campus, online, or in off-site educational settings;
- All digital platforms operated or sanctioned by the College.

It covers the prevention of people being drawn into terrorism, including radicalisation that may be linked to religious, ideological, or political motivations. The policy does not seek to restrict lawful expressions of belief or academic debate, recognising that not all strongly held or extreme views are problematic within a higher education setting.

3.0 Principles

The College's approach to Prevent is guided by the following principles:

1. **Proportionality** – Measures will be proportionate to the assessed level of risk.
2. **Collaboration** – Active engagement with local, regional, and national partners to share information and best practice.
3. **Safeguarding-led** – Prevent is embedded within the College's safeguarding framework.
4. **Transparency** – Clear communication of roles, responsibilities, and procedures.
5. **Balance** – Protecting freedom of speech and academic freedom while preventing harm.

4.0 Legislation and Statutory Guidance

This policy aligns with relevant **United Kingdom legislation** and **statutory guidance** applicable to the higher education sector, including but not limited to:

- **Counter-Terrorism and Security Act 2015** – Establishes the statutory **Prevent Duty**, requiring specified authorities, including higher education institutions, to have due regard to the need to prevent people from being drawn into terrorism.
- **Education (No. 2) Act 1986** – Places a duty on institutions to secure **freedom of speech** within the law for members, students, employees, and visiting speakers.
- **Equality Act 2010** – Prohibits discrimination, harassment, and victimisation, and promotes **equality of opportunity**.
- **Human Rights Act 1998** – Enshrines rights from the **European Convention on Human Rights** into UK law, including the right to freedom of thought, conscience, religion, and expression, subject to lawful limitations.
- **Data Protection Act 2018** and **UK General Data Protection Regulation (UK GDPR)** – Governs the secure handling, storage, and sharing of personal data, including that related to Prevent referrals.
- **Office for Students (OfS) Prevent Duty Framework** – Outlines regulatory expectations for higher education providers in demonstrating compliance with the Prevent Duty.
- **Channel Duty Guidance** (Home Office, latest edition) – Provides guidance on the duty to refer individuals at risk of being drawn into terrorism to the multi-agency **Channel** programme.
- **Keeping Children Safe in Education (KCSIE)** (DfE, latest edition) – Statutory guidance that, while aimed at schools and colleges, also informs safeguarding practice in higher education.
- **Revised Prevent Duty Guidance: England and Wales** (Home Office, latest edition) – Sets out sector-specific responsibilities for higher education providers in England and Wales.

These legislative and regulatory frameworks collectively inform the College's approach to **safeguarding against radicalisation and extremism** while upholding **academic freedom**, **freedom of speech**, and **data protection obligations**.

5.0 Definitions

- **Radicalisation**: The process by which an individual comes to support terrorism or forms of activity that may lead to terrorism.
- **Extremism (within the Prevent context)**: Views or behaviours that create a risk of drawing individuals into terrorism or supporting terrorist activity. It is recognised that not all strongly held or "extreme" views are problematic within a higher education environment, and lawful expressions of belief and academic debate are protected.
- **Prevent Duty**: The legal requirement on specified authorities to have due regard to the need to prevent people from being drawn into terrorism.
- **Prevent Lead**: The designated lead responsible for Prevent at the College.

6.0 Threats and Risks

6.1 Understanding Threats and Risks
The College recognises that the risk of radicalisation varies according to geographical,

demographic, and socio-political factors, which may be influenced by **global events**, **online extremist activity**, and **local community tensions**.

Local Risks – The College is located within the **London Borough of Barnet**, a diverse area where local tensions may arise from cultural or religious misunderstandings. Issues such as **drug-related crime**, **human exploitation**, and **violent disputes** between groups with differing beliefs can present vulnerability factors. The College is also aware that some students commute long distances, creating potential exposure to risks linked to **public transport safety** and **terror-related incidents**.

Regional Risks – London has historically been a target for **terrorist activity**, with incidents influencing public confidence and community cohesion. The risk of radicalisation can be exacerbated for those who face **immigration uncertainty**, are targeted by **proscribed groups**, or are exposed to extremist rhetoric that conflicts with UK law and **British values**. Organised gangs and peer networks may also exploit vulnerable individuals, including students, for criminal or extremist purposes.

National Risks – Across the UK, there is a recognised risk from individuals and groups motivated by **religious, political, or ideological causes**. These include those who feel socially isolated, have a history of criminal behaviour, or maintain ties to extremist networks abroad. Returning foreign fighters, radicalised offenders released from prison, and individuals recruited overseas pose ongoing challenges for national security.

6.2 Approach to Threats and Risk Updating

The College maintains a **dynamic Prevent risk register**, updated:

- **Annually** as part of the Prevent monitoring schedule and as required;
- **Immediately** following significant incidents or new intelligence.

Risk updates are informed by:

- **National threats** – reviewed using *Home Office* and *DfE* guidance, updated at least termly;
- **Regional risks** – monitored through the DfE **Prevent regional coordinator's newsletter** (subscription in place), ensuring awareness of emerging London trends;
- **Local risks** – informed by Barnet Council, the **Local Authority Designated Officer (LADO)**, the **Metropolitan Police Prevent Team**, **Multi-Agency Safeguarding Hub (MASH)**, and local community forums;
- **Sector updates** – received from the **London Prevent Network** and **Universities UK**.

7. Roles and Responsibilities

7.1   Advisory Board
- Ensures Prevent Duty compliance;
- Receives annual Prevent reports;

- Approves the Prevent Risk Assessment.

7.2 Senior Management Team

- Oversees operational implementation;
- Allocates resources for Prevent training and awareness.

7.3 Prevent Lead (PL)

- Leads Prevent strategy and implementation;
- Maintains the Prevent Risk Register;
- Acts as the primary point of contact for all Prevent referrals;
- Liaises with Barnet Prevent Team and MASH.

Prevent Lead (PL):
Mohammad T Islam
Email: m.islam@cce.ac.uk

7.4 Designated Safeguarding Lead (DSL) and Deputy Designated Safeguarding Lead (DDSL)

- Support Prevent Lead (PL) to implement Prevent strategy;
- Helping Prevent Lead (PL) to maintains the Prevent Risk Register;
- Acts as the secondary point of contact for all Prevent referrals;
- Liaises with Barnet Prevent Team and MASH if requested by Prevent Lead (PL)

Designated Safeguarding Lead (DSL):
Dr Abdul Matin Khan
Email: matin@cce.ac.uk

Deputy Designated Safeguarding Lead (DDSL):
Dr Yaminee Beeltah
Email: y.beeltah@cce.ac.uk

7.4 All Other Staff

- Undertake mandatory Prevent Awareness training;
- Spread awareness across the organisation;
- Report concerns promptly according to College Prevent policy.

8.0 Referral Process

All concerns regarding possible radicalisation must be referred to the Prevent Lead (PL) without delay. The Prevent Lead will:

1.0 Assess the concern against Prevent Thresholds (Annex A);
2.0 Where appropriate, consult or liaise with external partners (such as the Local Authority Prevent Team or the DfE Prevent Coordinator) prior to making a referral, particularly in

low- or moderate-level cases where early advice may help determine the most proportionate response;

3.0 Consult with external agencies where thresholds are clearly met;

4.0 Maintain secure records in line with the College's Data Protection Policy.

Prevent referrals may be made to:
• Barnet Prevent Team;
• The Police or Local Authority.

Referrals are submitted using the **National Prevent Referral Form**.

Following a Prevent referral, the relevant authorities will determine next steps, which may include consideration for support through the multi-agency Channel process.

9.0   Training & Awareness

- **Awareness Course** – For all new staff, covering forms of extremism, radicalisation risks, and professional roles in safeguarding.
- **Refresher Course** – Annual updates for staff who have previously completed awareness training.
- **Referrals Course** – For Prevent Lead (PL), Designated Safeguarding Lead (DSL), and Deputy Designated Safeguarding Lead (DDSL) who are responsible for making Prevent referrals; includes recognising indicators and submitting robust referrals to the Police or Local Authority.
- **Channel / PMAP Awareness Training** – For Prevent Lead (PL), Designated Safeguarding Lead (DSL), and Deputy Designated Safeguarding Lead (DDSL), ensuring understanding of how referrals may be considered by multi-agency panels (such as Channel or PMAP) once received by the authorities, including objectives, decision-making processes, and member responsibilities.

10.0 Freedom of Speech & External Speakers

The College's **Freedom of Speech Policy** ensures that visiting speakers undergo risk assessment. Speakers whose content poses a risk of radicalisation will not be approved.

11.0 Record Keeping

Prevent records are:

- Stored securely;
- Retained in line with the Data Retention Schedule;
- Accessible only to authorised staff.

12.0 Monitoring & Review

- Prevent Annual Report prepared by the Prevent Lead;
- Policy reviewed annually or earlier if risk profiles change.

13.0 Local Contact Details

Barnet Prevent Team – prevent@barnet.gov.uk | 020 8359 7890
Barnet MASH – mash@barnet.gov.uk | 020 8359 4066

Annex A – Referral Routes & Thresholds

Type of Concern	Threshold	Internal Route	External Route
Low-level ideological expression	Does not meet criminal threshold; may be welfare-related	PL	Consultation with Local Authority Prevent Team or DfE Prevent Coordinator may be considered before any referral
Moderate concern – extremist material viewed/shared	Pattern of activity suggesting susceptibilities	PL	Consultation with Local Authority Prevent Team or DfE Prevent Coordinator, and where appropriate a Prevent referral to Barnet Prevent Team / Police / Local Authority (via Prevent Referral Form)
High concern – active planning or intent to commit violence	Meets criminal threshold	PL & Senior Management	Immediate Prevent referral to Police Counter-Terrorism Command

- ◆ This ensures **all referrals are clearly Prevent referrals**, made to the Police or Local Authority.
- ◆ It avoids any implication that the College refers **directly** to Channel.

The End