

Prevent and Anti-Radicalisation Policy	Version:	V1.3
	Status:	Final
	Date:	02/01/2026

1. Approval Record

Name	Role	Date
Karen Everall	Head of Customer Success	19/04/2024
Rebecca Clarke	Head of People & Business Services	19/04/2024

2. Version History

Version	Date	Author	Description (nature of change/update)
1.0	18/04/2024	Anthony Melia	Policy creation (extracted from Safeguarding Policy)
1.1	09/05/2024	Anthony Melia	Roles and responsibilities changes
1.2	01/02/2025	Rebecca Clarke	Annual Review and version control update
1.3	02/01/2026	Rebecca Clarke	Annual review and version control update

3. Introduction and Commitment

Section 26 of the Counter Terrorism and Security Act 2015 places a duty on certain bodies, listed in Schedule 6 to the Act, to have “due regard to the need to prevent people from being drawn into terrorism”.

To meet these requirements, We Are Group’s Prevent Policy is designed to provide a clear framework to structure and inform our response to safeguarding concerns for those people who may be vulnerable to the messages of extremism.

In addition, it provides details of the local/national inter-agency process and expectations in identifying appropriate interventions based on the threshold of need and intervention model and the Channel process.

Prevent is a strand of the Government’s counter-terrorism strategy CONTEST that aims to stop people from being drawn into terrorism by:

- Responding to the ideological challenge of terrorism and the threat we face from those who promote it
- Preventing people from being drawn into terrorism and ensuring that they are given appropriate advice and support
- Working with sectors and institutions where there are risks of radicalisation that we need to address.

All agencies, not just the police, have an important role in preventing terrorism.

The ‘Prevent Duty’ established under the Counter-Terrorism and Security Act (2015) requires responsible authorities to ‘have due regard to the need to prevent individuals from being drawn into terrorism in the exercise of their duties’.

The Duty requires those working with children, young people and adults to be trained to understand the risk of terrorism in the local area; be able to identify when an individual is at risk of radicalisation; and know how to respond when a risk is identified by making a Prevent referral.

Prevent is a national programme delivered locally based on the risks identified in each Local Authority area. Regional police forces develop a Counter Terrorism Local Profile (CTLP) shared with operational groups in each Local Authority area.

4. Instruction

We Are Group has a responsibility to ensure:

- We have undertaken training in the Prevent Duty
- We are all aware of when it is appropriate to refer concerns about learners or employees
- To exemplify the British values of democracy, the rule of law, individual liberty and mutual respect and tolerance for those with different faiths and beliefs in our practice.

4.1 Leadership and Governance

Prevent forms part of the safeguarding agenda which is featured as part of Senior Leadership and operational team meetings. We Are Group's Head of People & Business Services is responsible for leading the Prevent initiative and is supported by the Chief Operating Officer and Managing Director who retain responsibility from an SLT and Board perspective.

The Head of People & Business Services actively engages with external champions (Prevent Coordinators) in the Safeguarding and Prevent fields to ensure the organisation remains up-to-date and compliant.

It has been well documented within current literature, namely the Prevent Guidance 2023 and Keeping Children Safe in Education 2023*, that protecting people from being drawn into radicalisation should align with the current safeguards in place to protect individuals from the risks of safeguarding issues. The Prevent Duty is also embedded within our ICT and Safeguarding policies.

*Please note: We only deliver training programmes to adults. Our responsibility is to the vulnerable and at risk.

4.2 What do we mean by Extremism?

The Government has defined extremism as: "the promotion or advancement of an ideology based on violence, hatred or intolerance, that aims to:

1. negate or destroy the fundamental rights and freedoms of others; or
2. undermine, overturn or replace the UK's system of liberal parliamentary democracy and democratic rights; or
3. intentionally create a permissive environment for others to achieve the results in (1) or (2).

The Prevent strategy deals with all forms of terrorism and with non-violent extremism, which can create an atmosphere conducive to terrorism and can popularise views which terrorists then exploit. It also made clear that preventing people from becoming terrorists or supporting terrorism requires a challenge to extremist ideas which are used to legitimise terrorism and are shared by terrorist groups.

The strategy also means intervening to stop people moving from extremist (albeit legal) groups into terrorist-related activity.

Prevent covers both international and domestic terrorist threats and includes the activities of Extreme / Far Right groups, Left Wing Anarchist Single Issue Terrorists (LASIT) and animal rights groups.

4.3 What do we mean by Radicalisation?

Radicalisation refers to the process by which a person comes to support terrorism and extremist ideologies associated with terrorist groups.

4.4 Understanding and Recognising Risks and Vulnerabilities of Terrorism or Extremism

There is no obvious profile / single indicator of a person likely to become involved in extremism or adopt violence in support of extremist ideas.

The process of radicalisation is different for every individual and can take place over an extended period or within a very short time frame.

Safeguarding from extremism is no different to how individuals would share a concern about drugs, physical and sexual abuse or any other form of criminality.

Learners can be drawn into violence or exposed to messages from extremist groups by many means.

These can include; exposure through the influence of family members or friends and/or direct contact with extreme groups and organisations or increasingly, through the Internet.

This can put individuals at risk of being drawn into criminal activity and subjected to significant harm by exposure to, or involvement with, groups or individuals who advocate violence as a means to a political or ideological end.

Examples of extremist causes that have used violence to achieve their ends include, extreme/far-right groups, Left Wing Anarchists, Single Issue Terrorists (LASIT), Animal rights groups, internal terrorists and international terrorist organisations.

4.5 Identifying Changes in Behaviour and Ensuring Learner and Employee Resilience to Extreme Narratives

Most individuals, even those who hold radical views do not become involved in extremism. Numerous factors can contribute to and influence the range of behaviours that are defined as extremism.

It is important to consider these factors to develop an understanding of the issue. It is also necessary to understand those factors that build resilience and protect individuals from engaging in violent extremist activity.

The following indicators may help to understand and identify factors that may suggest an individual or their family could be vulnerable to being drawn into extremism;

- Identity crisis – distance from culture, religious heritage and uncomfortable with their place in the society around them
- Personal crisis – family tensions, sense of isolation, low self-esteem, bullying, hate crime, disassociation from existing friendship groups and becoming involved with a new and

different group of friends searching for answers to questions about identity, faith and belonging

- Personal circumstances – migration, local community tensions, events affecting country and region of origin, alienation from UK values having a sense of grievance that is triggered by personal experience of racism or discrimination or aspects of Government policy, unmet aspirations, perceptions of injustice, perceived grievance, feeling of failure, rejection of civic life, criminality, experiences of imprisonment, poor resettlement, reintegration, previous involvement with criminal groups.

It is however important to note that individuals may display behaviours indicative of radicalisation for other reasons including:

- Alcohol
- Drug abuse
- Family breakdown/bereavement
- Domestic abuse

The process of radicalisation is different for every individual and can take place over an extended period or within a very short time frame. Potential indicators of radicalisation may include:

- Use of inappropriate language
- Anti-social behaviour
- Possession or accessing violent extremist literature
- Behavioural changes
- The expression of extremist views
- Advocating violent actions and means
- Association with known extremists
- Articulating support for violent extremist causes or leaders
- Using extremist views to explain personal disadvantage
- Joining or seeking to join extremist organisations
- Seeking to recruit others to an extremist ideology

It is important to be cautious in assessing these factors to avoid inappropriate labelling or stigmatising individuals because they possess characteristics to fit a specific profile.

The risk of radicalisation is the product of several factors and identifying this risk requires individuals to exercise their professional judgements and seek further advice where necessary as it may be combined with other vulnerabilities that need to be considered.

There is no such thing as a typical extremist and those involved in extremism come from a range of backgrounds and experiences. There is no single way of identifying whether a young person or adult is likely to be susceptible to an extremist ideology or vulnerable to radicalisation.

The process of radicalisation is different for every individual. It can take place over a long period, or it can be very quick.

Young people and adults who are vulnerable to grooming for sexual exploitation, criminal exploitation or county lines, may also be vulnerable to radicalisation.

Factors could include things like being a victim or witness of crime, abuse or bullying or having personal or emotional difficulties. Adverse childhood experiences, combined with specific influences from family and peers or online connections, may make someone more vulnerable to radicalisation.

Extremist influences could include, but are not limited to:

- Family members having direct contact or involvement with extremist or terrorist groups
- Staff members of an education or community setting promoting an extremist ideology
- Peers promoting an extremist ideology or sharing extremist material
- Access or exposure to online extremist material via social media or the internet - for example, propaganda including pictures, videos, blogs and fake news
- Exposure to extremist, terrorist or other violent activity in overseas settings
- Access or exposure to extremist leaflets, magazines or stickering
- Exposure to extremist groups hosting marches, protests or stalls

4.6 Risk factors

Push and pull factors can put a young person or adult at risk of extremism or radicalisation. Often there are several risk factors present that, seen together, can cause concern.

Push factors Push factors may include a young person's or adult's feelings:

- Isolated
- They do not belong
- They have no purpose
- Low self-esteem
- Their aspirations are unmet
- Anger or frustration
- A sense of injustice
- Confused about life or the world
- Real or perceived personal grievances

Pull factors Pull factors could include an extremist or terrorist group, organisation or individual:

- Offering a sense of community and a support network
- Promising fulfilment or excitement
- Making the young person or adult feel special and part of a wider mission
- Offering a very narrow, manipulated version of an identity that often supports stereotypical gender norms
- Offering inaccurate answers or falsehoods to grievances
- Encouraging conspiracy theories
- Promoting an 'us vs. them' mentality
- Blaming specific communities for grievances
- Encouraging the use of hatred and violent actions to get justice
- Encouraging ideas of supremacy

4.7 Protecting End Users and Employees from Radicalising Influences

E-Safety is not simply about virus protection, internet filtering, firewalls or other Information and Communications Technologies (ICT) security concerns.

E-Safety is also about ensuring that technology is used in a manner that is safe and respectful to others.

Due to this, E-Safety has a significant overlap with other policies and procedures, particularly those related to safeguarding, anti-bullying and acceptable use of ICT.

It is the intention of We Are Group to implement safeguards to support staff and end users to manage and identify risks independently and to seek advice and guidance in an appropriate and timely manner.

We believe that this can be achieved through a combination of security measures, training and guidance along with the implementation of associated policies.

An E-Safety incident is considered to have occurred when an end user or staff member instigates or is the victim of an activity which utilises ICT to endanger the personal safety, mental well-being, or financial well-being of another individual.

Activities which will be considered E-Safety incidents include, but are not limited to, the use of ICT to access, view, copy or download illegal content, or materials, including, but not limited to:

- Child pornography
- Materials inciting racial hatred or violence
- Materials that are deemed to be in connection with radicalisation or will place
- Individuals at risk of radicalisation
- Access, view, copy or download inappropriate content, or materials, as defined by We Are Group's Acceptable Use of ICT policy
- Bully or harass an individual or group (Cyber Bullying)
- Commit fraud or identify theft
- Undertake any activities which would violate the Protection of Vulnerable Adults or Anti-Bullying policies
- Any other incident where it can be reasonably considered that the personal safety,
- Mental well-being or financial health of an individual has been endangered using ICT
- Accidental breaches of these rules can sometimes occur. If there is a worry that such a breach has taken place, or if a concern regarding terrorist material or possible extremist activity requires reporting, please contact; Rebecca Clake – Head of People & Business Services Rebecca@wearegroup.com
- Amir Farooq – Chief Operating Officer Amir.Farooq@wearegroup.com
- Safeguarding@wearegroup.com

4.8 Martyn's Law

The Government announced details for the Protect Duty, now to be known as 'Martyn's Law' in tribute of Martyn Hett, who was killed alongside 21 others in the Manchester Arena terrorist attack in 2017.

Martyn's Law will keep people safe, enhancing our national security and reducing the risk to the public from terrorism by the protection of public venues.

It will place a requirement on those responsible for certain locations to consider the threat from terrorism and implement appropriate and proportionate mitigation measures.

The legislation will ensure parties are prepared, ready to respond and know what to do in the event of an attack. Better protection will be delivered through enhanced security systems, staff training, and clearer processes.

Premises will fall within the scope of the duty where “qualifying activities” take place. This will include locations for purposes such as entertainment and leisure, retail, food and drink, museums and galleries, sports grounds, public areas of local and central government buildings (e.g. town halls), visitor attractions, temporary events, places of worship, health, and education. **

It is proposed that the duty will apply to eligible premises which are either: a building (including collections of buildings used for the same purposes, e.g. a campus); or a location/event (including a temporary event) that has a defined boundary, allowing capacity to be known. Eligible locations whose maximum occupancy meets the above-specified thresholds will then be drawn into the relevant tier.

Therefore, premises will be drawn into the scope of the duty if they meet the following three tests:

- That the premises are eligible – i.e., building or event with a defined boundary.
- That a qualifying activity takes place at the location; and
- That the maximum occupancy of the premises meets a specified threshold – either 100+ or 800+

The Bill will impose a duty on the owners and operators of certain locations to increase their preparedness for and protection from a terrorist attack by requiring them to take proportionate steps, depending on the size and nature of the activities that take place there.

Proportionality is a fundamental consideration for this legislation. It will therefore establish a tiered model, linked to the activity that takes place at a location and its capacity:

A standard tier will drive good preparedness outcomes. Duty holders will be required to undertake simple yet effective activities to improve protective security and preparedness. This will apply to qualifying locations with a maximum capacity of over 100. This could include larger retail stores, bars, or restaurants.

An enhanced tier will see additional requirements placed on high-capacity locations in recognition of the potentially catastrophic consequences of a successful attack. This will apply to locations with a capacity of over 800 people at any time. This could include live music venues, theatres, and department stores.

Eligible locations whose maximum occupancy meets the above specified thresholds will be then drawn into the relevant tier.

There will be some limited exclusions and exemptions from the duty. This includes locations where transport security regulations already apply; and those that are vacant over a reasonable period or are permanently closed. Those with a large floor space and low occupancy in practice (e.g. warehouses and storage facilities) as well as offices and private residential locations, will not be in scope.

**We Are Group premises may not meet the threshold(s) but there are events that staff attend where consideration must be given to this proposed legislation and these measures.

4.9 How to make a Prevent Referral

When someone identifies a risk or has a concern about the vulnerability of an individual concerning radicalisation, the organisation's safeguarding processes must be followed and the Designated Safeguarding Lead (DSL) informed.

This must then be reported to the Regional Police Prevent Team by completing the Prevent Referral Form and sending it to the Regional Police Prevent Team.

The Regional Police Prevent Team will respond to all referrals to undertake preliminary investigations and assess the level of threat and risk posed by the individual and/or their family.

All referrals are logged on the Prevent National database.

Not all cases will require further action however; there are occasions when risk may be perceived to be immediate, where the information must be reported immediately to the police who will then coordinate with the relevant Local Authority in taking the most appropriate action to ensure the safety of the young person / adult at risk.

Prevent referrals to the Police does not require consent. However, the process is voluntary and the individual concerned must consent to engage. Irrespective of whether the individual consents to engage, fundamental Police checks and safeguarding measures will be put in place.

Where the level of risk or vulnerability to radicalisation is substantiated, the Regional Police Prevent Team will contact the Prevent Lead in the relevant Local Authority and request that a Channel Panel be convened to monitor the risk and to develop a support plan for the individual.

If there is a reason to believe that the young person or adult associates with those known to be involved in extremism either because they associate directly with known individuals or because they frequent key locations where these individuals are known to operate, there is a need to refer to the Channel Panel process.

If additional safeguarding concerns exist for a vulnerable adult, an Adult Safeguarding Concern Form should be completed and sent to the relevant Local Authority.

Referrals/concerns should indicate that a Prevent referral has been made to the Regional Police Prevent Team and the Local Authority should contact the Regional Police Prevent Team in all cases referred.

4.10 What is Channel?

Channel is a key element of the Prevent Strategy. It is a multi-agency approach to protect people at risk from radicalisation using collaboration between local authorities, statutory partners, the police and the local community to:

- Identify individuals at risk of being drawn into terrorism
- Assess the nature and extent of that risk and
- Develop the most appropriate support plan for the individual concerned

Channel is about safeguarding young people and adults from being drawn into terrorism by offering support to those who are identified as being vulnerable at an early stage. Channel provides a multi-agency framework to assess the nature and extent of the risk and develops an appropriate support plan for the individuals concerned.

Under provisions in the Counter Terrorism and Security Act (2015), Local Authorities are required to establish Channel Panels to support vulnerable individuals from being radicalised and drawn into extremist activity.

4.11 The Channel Panel Process

The Channel Panel will be convened on an individual basis by the named Local Authority Prevent Lead at the request of the Police Prevent Team. Key stakeholders will be invited to attend the Channel Panel and to contribute information about their agency's involvement with the individual who has been referred.

Channel Panels are led by the Local Authority and include local police as well as other partners from a range of other agencies including the Criminal Justice System, education and health; agencies must cooperate with the Channel Panel in the discharge of its functions, so far as is reasonably practicable. Local Authorities and their partners have to consider how best to ensure that these assessments align with any assessment undertaken within the Children Act 1989 and 2004, the Care Act 2014, Working Together 2018 (updated December 2020) and Keeping Children Safe in Education 2023.

The Channel Panel will assess the extent to which the identified individual is vulnerable to being drawn into terrorism and arrange for support to be provided to those individuals.

Practitioners from agencies who know the individual will be invited to the Channel Panel. Where an individual is known to Children's Social Care or Adult Social Care, the allocated social worker should attend the Panel.

If there is no further action the feedback will be given to the referring agency and advice given appropriately.

For each Channel case, a review will take place at 6 and 12 months after that case has been exited from the Channel process.

If there are continuing safeguarding needs identified at the Channel Panel, an Adult Safeguarding Concern to Adult Social Care at the earliest opportunity to enable a strategy meeting to be held. In all cases, a representative from the Regional Police Prevent Team and Local Authority Team should be invited to the strategy meeting.

4.12 Training

All We Are Group employees are required to undertake adult safeguarding and Prevent training relevant to their role. Training is mandatory for all staff and must be completed within the first month of joining We Are Group. Prevent training will be repeated as required and whenever changing legislation and responsibilities require it. All operational staff and safeguarding leads must attend / complete at least one safeguarding training event every year.

Information is provided to all employees to raise awareness of Prevent and commitment to this policy. This is done through staff meetings, standardisation, We Are Group's SharePoint repository and regular policy update webinars.

4.13 Continuous Improvement

We are committed to continuous improvement in our Prevent and Anti-Radicalisation Policy and practices. We will regularly review and update our policy and procedures based on feedback, best practices, and changes in legislation or regulations. We will also conduct internal audits or inspections to assess the effectiveness of our policy and its implementation and make necessary adjustments as needed.

Our Prevent and Anti-Radicalisation Policy reflects our commitment to safeguarding and promoting the welfare of our learners and creating a safe and inclusive learning environment.. This policy will be communicated, implemented, and reviewed regularly to ensure its effectiveness and alignment with best practices in safeguarding and preventing radicalisation.