



PREVENT Policy

Version 2.0



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PREVENT Policy

Version Control

VERSION	REVIEWER NAME	DATE	NEXT REVIEW	COMMENTS
1.0	Rena Panesar	Sept 2020	Sept 2021	First Policy.
2.0	Policy Pros	Oct 2025	Oct 2026	Retemplated and updated to split E-Safety out of this policy.



Introduction

Pathways LDN is committed to safeguarding the welfare of all learners and staff. This policy directly addresses our statutory duty under the Counter-Terrorism and Security Act 2015 (CTSA 2015) to have "due regard to the need to prevent people from being drawn into terrorism."

Purpose

The purpose of this policy is to:

- Ensure full compliance with the Prevent Duty statutory guidance, thereby protecting learners, staff, and the organisation from the threat of terrorism and extremism.
- Provide clear procedures for identifying individuals who may be vulnerable to radicalisation and intervening early with appropriate support.
- Promote the fundamental British Values of democracy, the rule of law, individual liberty, and mutual respect and tolerance for those with different faiths and beliefs.
- Clarify the roles and responsibilities of the Designated Safeguarding Lead (DSL), Deputy DSL (DDSL) and all staff in recognising and referring Prevent-related concerns.

Who and what this policy applies to

This policy applies to all staff (including Directors, employees, subcontractors, and volunteers) and all learners (including apprentices and adult learners).

It covers conduct and activities occurring both on our premises and online, including the use of company IT systems, social media, and digital learning platforms.



Definitions

Extremism: Vocal or active opposition to fundamental British values, including democracy, the rule of law, individual liberty, and mutual respect and tolerance of different faiths and beliefs.

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

Terrorism: Acts or threats designed to influence the government or intimidate the public for the purpose of advancing a political, religious, or ideological cause.

Vulnerability: The condition of being susceptible to radicalisation, often exacerbated by personal or socio-economic factors.



Roles and Responsibilities

Directors (DSL and Deputy)

- Set Prevent approach, approve risk assessment and action plan, and monitor compliance.
- Act as first and second contact for concerns, decide on referrals to the local authority, Channel or police.
- Keep current Prevent and Channel contact details, including out-of-hours routes.
- Ensure safer recruitment, induction and refreshers cover Prevent, online safety and British values.
- Oversee proportionate IT and venue controls, for example, filtering, monitoring and guest speaker checks.
- Ensure concerns are recorded promptly, stored securely and reviewed for learning; report themes to the board.
- Test the duty through audits or drills and update procedures when guidance changes.
- Build Prevent clauses into partner and employer agreements.

All staff

- Complete Prevent training and refreshers; apply reasonable adjustments so support is accessible.
- Follow classroom and online conduct rules, challenge extremist material or hate incidents safely, and promote British values.
- Use professional curiosity, watch for changes in behaviour, attendance or online activity.
- Notice, record, and report Prevent concerns immediately to a Director in the DSL role.



Policy

Core Principles of PREVENT

What PREVENT Is

PREVENT is one of the four elements of the government's counter-terrorism strategy (CONTEST). Its specific aim is to stop people from becoming terrorists or supporting terrorism. The Prevent Duty places a legal requirement on Pathways LDN to have due regard to the need to prevent people from being drawn into terrorism and extremism.

The programme works by providing voluntary support through the multi-agency **Channel** process, which is designed to identify individuals at risk of radicalisation and offer them tailored interventions before they commit a crime.

Risk Factors for Radicalisation and Vulnerability

Radicalisation is a process, not an event. Vulnerability to being drawn into extremism is often linked to personal factors, unresolved grievances, and a search for belonging or purpose. The following factors may make a learner more susceptible to extremist narratives:

- **Identity and Belonging:** Feelings of isolation, grievance, rejection, or a lack of self-worth.
- **Mental Health:** Untreated mental health issues, low self-esteem, or trauma.
- **Unmet Needs:** Lack of strong family or peer networks, or experiencing socio-economic disadvantage.
- **Grooming:** Being targeted by extremist recruiters online or offline who offer a sense of belonging or purpose.
- **Exposure to Extremist Material:** Seeking out or consistently engaging with extremist or hateful ideologies online (including misinformation, disinformation, and conspiracy theories).



Indicators for Staff and Other Learners to Be Aware of

Staff and learners should report concerns if they observe a sudden, significant, or worrying change in behaviour, which may include:

Category	Potential Indicator
Ideological Change	Advocating support for proscribed terrorist groups or engaging in hateful rhetoric against specific groups of people (e.g., racist, homophobic, or sexist language).
Appearance & Lifestyle	Sudden and severe withdrawal from social life; significant, sudden changes in dress or grooming to align with extremist groups; or hostility towards previous friends/hobbies.
Digital Activity	Secretive behaviour around internet use; persistent sharing or viewing of extremist content; or attempts to bypass company filtering/monitoring systems.
Grievance	Expressing strong, uncharacteristic, and persistent anger or grievance that is channelled into an extremist political or religious cause.

Staff Training and Development

Pathways LDN is committed to ensuring that all personnel are adequately trained to meet the legal requirements of the Prevent Duty.

All staff must undertake mandatory initial training on the Prevent Duty and safeguarding awareness. This training is formally refreshed at least annually to ensure that staff knowledge is current and responsive to new and emerging threats, such as changes in online harms and evolving extremist narratives.

The Designated Safeguarding Lead (DSL) and their deputy receive specialised, in-depth training (including WRAP or equivalent DfE-endorsed courses) to manage risk assessment, consultation, and the formal referral process into Channel.



Local Risk Assessment

Pathways LDN maintains an organisational-level Risk Assessment to identify areas where learners may be vulnerable to radicalisation. This assessment considers:

- The local socio-economic environment (e.g., specific area vulnerabilities in London).
- The demographic profile and individual vulnerabilities of our learner cohorts.
- The risks associated with the sectors we train for and the digital environments we use.

Online Harms and Extremist Content

Pathways LDN recognises that the digital landscape presents evolving risks that can draw young people into extremism. In alignment with KCSIE 2025, our definition of online risk is expanded to specifically address non-traditional forms of harmful content:

- **Misinformation, Disinformation, and Conspiracy Theories** are explicitly viewed as content that can groom vulnerable learners by undermining trust in institutions and promoting hateful narratives.
- **IT Safeguards:** Our IT systems, including filtering and monitoring solutions, are designed to log and flag persistent attempts to access illegal or harmful extremist content, allowing for timely intervention by the DSLs.

Please see our E-Safety and Safeguarding policies for more information.



Procedure for Reporting Concerns

- Any concern suggesting a learner is at risk of radicalisation must be **reported immediately** to the **DSL or Deputy DSL**.
 - DSL – Email: rena@pathwaysldnld.com Telephone: 07982906672
 - DDSL – Email: paul@pathwaysldnld.com Telephone: 07508114160
- If the concern suggests an **immediate threat to life or property**, the police must be called on **999** without delay.
- The DSL or Deputy DSL will consult the **Local Authority Prevent Lead** for the London Borough of Hillingdon (or the relevant authority where the learner resides) and/or the local **Multi-Agency Safeguarding Hub (MASH)** to determine if the concern meets the threshold for the Channel programme.
- If the concern meets the threshold, a formal referral into the **Channel** process will be made. Channel is a multi-agency panel that assesses the referral and develops a support package for the individual, providing educational, ideological, or psychological interventions tailored to reduce their vulnerability.

Reviewing

Pathways LDN Ltd. is committed to ensuring our policies are effective and up-to-date.

The Directors are responsible for this process and will review this policy at least once a year or more frequently if needed due to changes in laws, regulatory guidance, or best practice.

This policy will be made available in other formats upon request, and all learners are encouraged to speak to any member of staff if they have any questions or require clarification.



Appendix 1: Useful Resources and Contact Details

Local Authority Prevent Contact (Hillingdon)

SCCU staff must always follow internal reporting procedures first, but should be aware of the external contact for consultation:

Purpose	Contact Details	Why it's useful
Hillingdon Prevent Lead	Fiona Gibbs (Stronger Communities and Prevent lead) Email: fgibbs@hillington.gov.uk	To seek non-urgent advice or consultation before making a formal Channel referral.
Hillingdon MASH	01895 556006	The core safeguarding referral pathway, which the DSL must use to make initial contact for a Channel referral.

Guidance on Radicalisation and Intervention (ACT Early)

The ACT Early campaign provides support and guidance specifically for friends, family, and professionals worried about someone being drawn into extremism.

Resource	URL / Purpose	Why it's useful
ACT Early Website	actearly.uk	Provides detailed advice on how to spot the signs of radicalisation and offers support from specially trained police officers in confidence.
ACT Early Support Line	0800 011 3764	Confidential phoneline for the public, friends, and family to share concerns with the national Counter Terrorism policing team.
DfE Guidance (GOV.UK)	Search GOV.UK for "Get help for radicalisation concerns"	Provides an overview of the Prevent programme and what to do if you are worried about someone, covering both Extreme Right-Wing and Islamist terrorism.



Useful UK Counter-Terrorism and Prevent Resources

These links are for reporting immediate threats or suspicious activity that could be connected to terrorism.

Purpose	URL / Contact	Why it's useful
Immediate Danger	Call 999	Use only if there is an immediate threat to life or property.
Non-Emergency Hotline	0800 789 321 (Confidential Anti-Terrorist Hotline)	To report any suspicious activity or behaviour that you believe is connected to terrorism, but is not an emergency .
Online Reporting Form	gov.uk/ACT	Allows staff and learners to report possible terrorist activity securely and confidentially online, including details of people, vehicles, or suspicious reconnaissance.
Reporting Online Material	gov.uk/report-terrorism	For reporting illegal or harmful online material that promotes terrorism or extremism (e.g., articles, images, or websites made by terrorist organisations).