



# **Preventing Extremism and Radicalisation Policy**

**September 2024**

**Version 1.1**  
**Approved by the Board of Governors**

The following outlines the College's broader approach to upholding the Prevent Duty in having due regard for the need to prevent people from being drawn into terrorism; it should be read in conjunction with the following College policies:

- *Safeguarding Policy*
- *Academic Freedom and Freedom of Speech Policy*
- *External Speakers and Events Policy*

The College maintains and updates a *Prevent Duty Risk Assessment and Action Plan*, which details its ongoing approach to mitigating the risks associated with radicalisation and the proliferation of extremism.

**To report a concern or seek further advice, see Contact Information on page 13**

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## **1. Introduction**

- 1.1. The current threat from terrorism and extremism in the United Kingdom can involve the exploitation of vulnerable people, including children, young people and vulnerable adults to involve them in terrorism or activity in support of terrorism.
- 1.2. Since 2010, when the Government published the Prevent Strategy, there has been an awareness of the specific need to safeguard children, young people and families from violent extremism. There have been several occasions, both locally and nationally, in which extremist groups have attempted to radicalise vulnerable children and young people to hold extreme views including views justifying political, religious, sexist or racist violence, or to steer them into a rigid and narrow ideology that is intolerant of diversity and leaves them vulnerable to future radicalisation.
- 1.3. Under the Prevent duty introduced by the Counter-Terrorism and Security Act 2015, relevant higher education bodies will need to assess the risks of people being drawn into terrorism and ensure they have plans in place for mitigating these risks.

## **2. Policy Statement**

UK Business College (UKBC) has due regard for the need to prevent people from being drawn into terrorism and is committed to providing a secure environment for all of our students, staff and stakeholders.

## **3. Policy Concept**

- 3.1. UKBC values freedom of speech and the expression of beliefs / ideology as fundamental rights underpinning our society's values. Both students and teachers have the right to speak freely and voice their opinions. However, freedom comes with responsibility and free speech that is designed to manipulate the vulnerable or that leads to violence and harm of others goes against the moral principles in which freedom of speech is valued. Free speech is not an unqualified privilege; it is subject to laws and policies governing equality, human rights, community safety and community cohesion.
- 3.2. UKBC clears that this exploitation and radicalisation should be viewed as a safeguarding concern.
- 3.3. Our College's Preventing Extremism and Radicalisation Policy also draws upon the guidance contained in the Prevent Strategy, 2011, DfE Guidance Keeping Children Safe in Education, 2014; Tackling Extremism in the UK, DfE's Teaching Approaches that help Build Resilience to Extremism among Young People; Peter Clarke's Report of July 2014,;

and the Home Office Guidance The Prevent duty in higher education in England: updated advice note for institutions (September 2016); Prevent Duty Guidance, 2015 and draft Prevent duty guidance: for higher education institutions in England and Wales (subject to parliamentary approval), 2015.

#### **4. Definitions**

Definitions of radicalisation and extremism, and indicators of vulnerability to radicalisation are to be found in Appendix 2.

#### **5. College Ethos and Practice**

- 5.1. There is no place for extremist views of any kind in our College, whether from internal sources – students, staff or directors - or external sources - College community, external agencies or individuals.
- 5.2. It is imperative that our students have a safe place where they can discuss and explore controversial issues safely and in an unbiased way and where our teachers encourage and facilitate this.
- 5.3. As a College, we recognise that extremism and exposure to extremist materials and influences can lead to poor outcomes for our students. We also recognise that if we fail to challenge extremist views we are failing to protect our students.
- 5.4. Extremists of all persuasions aim to develop destructive relationships between different communities by promoting division, fear and mistrust of others based on ignorance or prejudice and thereby limiting the life chances of young people. Education is a powerful weapon against this; equipping young people with the knowledge, skills and critical thinking, to challenge and debate in an informed way. Therefore, at UKBC we will provide a broad and balanced curriculum, delivered by skilled professionals, so that our pupils are enriched, understand and become tolerant of difference and diversity and also to ensure that they thrive, feel valued and not marginalised.
- 5.5. We are aware that young people can be exposed to extremist influences or prejudiced views from an early age which emanate from a variety of sources and media, including via the internet, and at times students may themselves reflect or display views that may be discriminatory, prejudiced or extremist, including using derogatory language.
- 5.6. Any prejudice, discrimination or extremist views, including derogatory language, displayed by students, staff and visitors will always be challenged and where appropriate dealt with. Where misconduct by a teacher is proven, the matter will be referred to the

National College for Teaching and Leadership for their consideration as to whether a Prohibition Order is warranted.

5.7. As part of wider safeguarding responsibilities, College staff will be alert to:

- Disclosures by students of their exposure to the extremist actions, views or materials of others outside of College, such as in their homes or community groups, especially where students have not actively sought these out
- Graffiti symbols, writing or art work promoting extremist messages or images
- Students accessing extremist material online, including through social networking sites
- Students voicing opinions drawn from extremist ideologies and narratives
- Use of extremist or 'hate' terms to exclude others or incite violence
- Intolerance of difference, whether secular or religious or, in line with our equalities policy, views based on, but not exclusive to, gender, disability, homophobia, race, colour or culture
- Attempts to impose extremist views or practices on others
- Anti-Western or Anti-British views

## **6. Teaching Approaches**

- 6.1. We will all strive to eradicate the myths and assumptions that can lead to some people becoming alienated and disempowered, especially where the narrow approaches student may experience elsewhere may make it harder for them to challenge or question these radical influences. In our College this will be achieved by good teaching and developing a culture which brings awareness of social norms.
- 6.2. The College will ensure that all of our teaching approaches help our students build resilience to extremism and give pupils a positive sense of identity through the development of critical thinking skills. We will ensure that all of our staff are equipped to recognise extremism and are skilled and confident enough to challenge it.
- 6.3. We will be flexible enough to adapt our teaching approaches, as appropriate, so as to address specific issues so as to become even more relevant to the current issues of extremism and radicalisation.
- 6.4. The College will promote the British values of democracy, the rule of law, individual liberty, mutual respect and tolerance for those with different faiths and beliefs. We will teach and encourage pupils to respect one another and to respect and tolerate difference, especially those of a different faith or no faith. It is indeed our most fundamental responsibility to keep our pupils safe and prepare them for life in modern multi-cultural Britain and globally.

## 7. Use of External Agencies and Speakers

- 7.1. At UKBC we encourage the use of external agencies or speakers to enrich the experiences of our students. However we will positively vet those external agencies, individuals or speakers who we engage to provide such learning opportunities or experiences for our pupils.
- 7.2. Such vetting is to ensure that we do not unwittingly use agencies that contradict each other with their messages or that are inconsistent with, or are in complete opposition to, the College's values and ethos. We must be aware that in some instances the work of external agencies may not directly be connected with the rest of the College curriculum so we need to ensure that this work is of benefit to our students.
- 7.3. For specific information & guidelines about inviting External Speakers refer to the *External Speakers & Events Policy*. Speakers can be invited and organised by any staff member or a registered student by following the *External Speakers and Events Policy* guidelines.

## 8. Web Filtering

- 8.1. UKBC uses its third-party firewalls and security features to actively track and block access to extremist material, and to alert the Prevent Leads and Coordinators to students or staff whose browsing behaviour may indicate they are at risk of radicalisation.
- 8.2. The Secure Web Gateway uses real-time filtering to ensure it is up to date, rather than relying on URL blocklists, and its safeguarding suite blocks and reports access to content from seven category rulesets including most importantly hate & discrimination, violence, illegal, radicalisation, suicide, and self-harm. Alerts are immediately sent to the IT department by the firewall when content classified under one of these rulesets is accessed, and this can be traced by IP address and log-in details to specific computer and user. Where the content accessed flags up a Prevent risk, such as accessing extremist websites or forums, the IT department will make a Prevent report following the process set out in paragraph 11 below. Safeguarding risks such as suicide, or self-harm, will likewise be reported to the Designated Safeguarding Officers.
- 8.3. UKBC does not envision any of its current course offering justifying access to sites in these categories for legitimate research or study. However, should such a requirement arise, specific authorisation must be requested from the Principal or Prevent Lead along with fully evidenced written justification as to why access to restricted content is required. The Prevent Lead and Principal will discuss the request and make a determination to which such decision shall be considered as final.

- 8.4. Mobiles, tablets, and staff and student laptop use over Wi-Fi (BYOD) is restricted to three domains that are subject to web-filtering and reporting through Smoothwall in the same way as the LAN connected desktops:

## **9. Risk Assessment**

- 9.1. The College's Executive Committee, Academic Board and Designated Prevent Lead will jointly coordinate on the development of an institutional Prevent Risk Assessment and Action Plan, to be periodically submitted to the Board of Governors; the Board of Governors will satisfy itself that suitable controls are in place to demonstrate compliance with the Duty prior to signing-off its Accountability Statement as part of its annual return to the Office for Students.
- 9.2. The Plan is structured to align with the themes outlined in the UK Government's Prevent Duty Guidance: for Higher Education Institutions in England and Wales; an objective assessment of risk is made against each theme given within the guidance. Actions are disseminated and monitored by the Executive Committee.
- 9.3. The Plan additionally covers building and security arrangements intended to protect students whilst on campus.
- 9.4. Risk assessment will include consideration of visiting speakers and the use of College premises by external agencies, anti-bullying policy and other issues specific to the College's profile, community and philosophy, staff, student and board members' training and knowledge of the prevent duty, IT and cyber-security, campus or premises security, external speakers, freedom of expression, information sharing, students' unions or organisations, and welfare, pastoral and chaplaincy support. The College will screen staff, visitors and volunteers to ensure that they will not deliver messages of extremism or radicalisation.

## **10. Responsibilities**

- 10.1. Our College, like all others, is required to identify a Prevent Single Point of Contact (SPOC or Designated Prevent Lead) who will be the lead within the organisation for safeguarding in relation to protecting individuals from radicalisation and involvement in terrorism. The responsibilities of the Prevent Lead are described in Appendix 3.

Natalia Debek  
Maria Michail

[natalia.debek@ukbusinesscollege.org](mailto:natalia.debek@ukbusinesscollege.org)  
[maria.michail@ukbusinesscollege.org](mailto:maria.michail@ukbusinesscollege.org)



- 10.2. Staff at UKBC will be alert to the fact that whilst extremism and radicalisation is broadly a safeguarding issue there may be some instances where a student may be at direct risk of harm or neglect. For example; this could be due to students displaying risky behaviours in terms of the activities they are involved in or the groups they are associated with or staff may be aware of information about a child's family that may equally place a student at risk of harm.
- 10.3. Therefore all staff working in UKBC (including visiting staff, volunteers, contractors and students on placement) are required to report instances where they believe there is potential risk of harm or neglect, or if they have concerns that a student or a member of staff may be at risk of radicalisation or involvement in terrorism. They should speak with the Prevent Lead, Natalia Debek, or the Campus Team Leader Gerald Ankrah if she is not available.
- 10.4. Attention is drawn to all, that the maintenance of a safe environment in UKBC's physical and virtual facilities is imperative. To that end, all stakeholders need to be alert to any such potential threats and fully observe the guidelines of this policy and associated documentation in order to mitigate negative effects and detrimental consequences.

## 11. Reporting Process

- 11.1. Prevent concerns can be raised by any staff member or student by sending a completed Radicalism and Extremism Concern form (that can be found on the UKBC Connect portal):

- by post (including anonymously) marked for the attention of the Prevent Lead to:

1B St George's Way, Leicester LE1 1SH

- by email to:

Natalia Debek: [natalia.debek@ukbusinesscollege.org](mailto:natalia.debek@ukbusinesscollege.org)

Or if unavailable:

Gerald Ankrah – [maria.michail@ukbusinesscollege.org](mailto:maria.michail@ukbusinesscollege.org)

- 11.2. Alternatively, staff or students may approach the Prevent Leads in person for a discreet meeting, or raise Prevent concerns in the course of disciplinary, complaints/grievance, or safeguarding procedures.

11.3. A disciplinary matter or complaint will be automatically be referred to the Prevent Lead where it reveals a potential Prevent concern – e.g., identity fraud an excessive absencesraise concerns about who a student is associating with, or complaints/disciplinary issuesconcerning racist/homophobia/Islamophobia/anti-Semitism.

11.4. Disciplinary/grievance/complaints meetings in such cases will usually be chaired by the Prevent Lead.

## **12. Channel Referral**

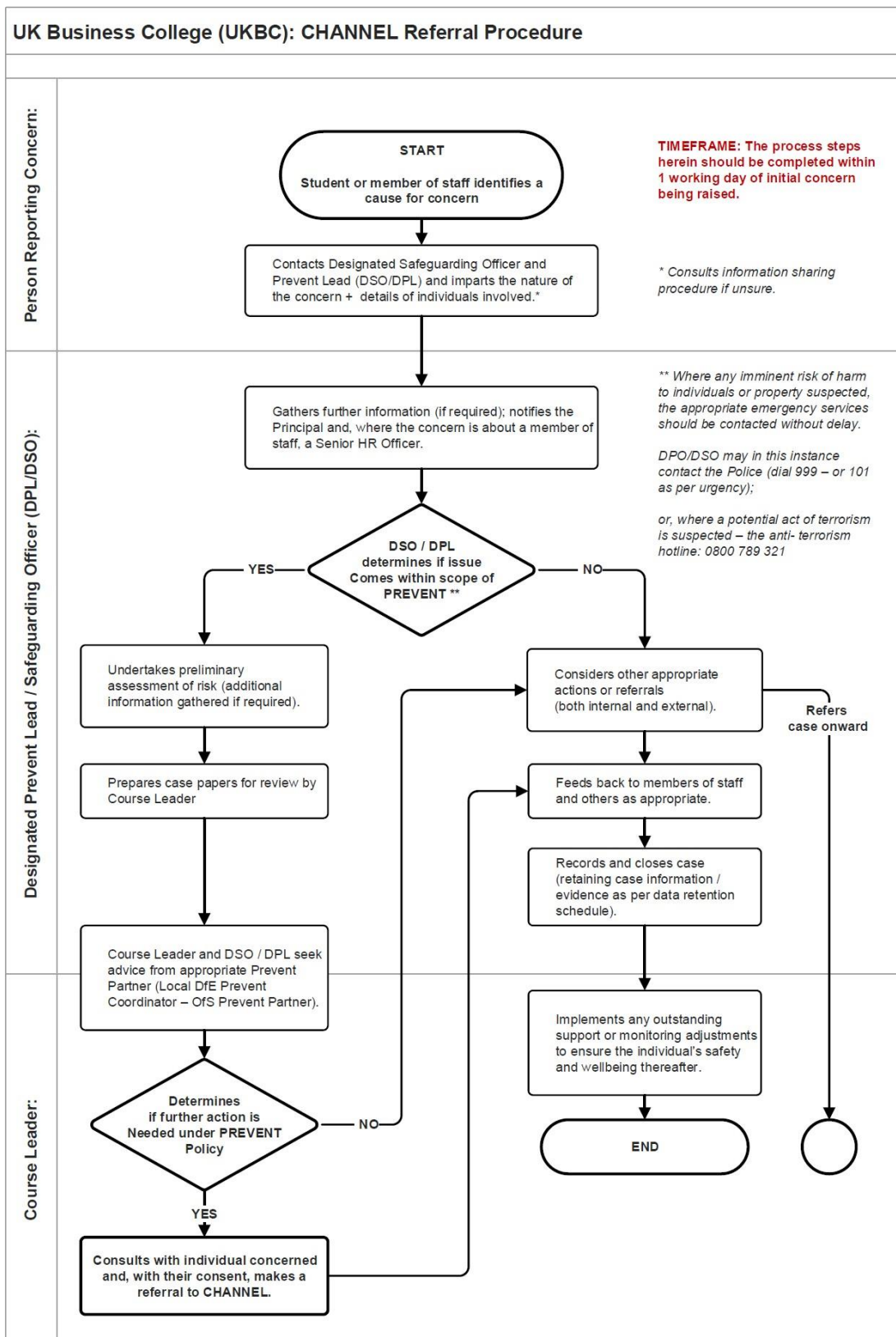
12.1. 'Channel' is the safeguarding process which takes a multi-agency case management role in managing the risk of those who have been or are at harm of becoming radicalised. Regional Channel Coordinators are responsible for providing support and expert advice to all police forces and local authorities across the region. The Prevent Lead will discuss cases referred to him as Prevent concerns with Student Support and the Designated Safeguarding Officers, and where appropriate the Regional Channel Coordinators, and decide in each case whether it is appropriate for UKBC to refer the case to Channel.

## **13. Review**

13.1. This Policy is reviewed annually each year by the School's Executive Committee and ratified by its Board of Governors, prior to the next academic year beginning in September.

13.2. The Risk Assessment and Action Plan is reviewed in August each year at the end of each OfS Prevent Reporting Period (1<sup>st</sup> August – 31<sup>st</sup> July), and approved by the Board of Governors during the general policy review.

## Appendix 1: Channel Referral Procedure



## Appendix 2: Definitions and Indicators of Vulnerability to Radicalisation

**‘Radicalisation’** refers to the act or process of making a person more favouring of extreme or fundamental changes in political, economic or social conditions, institutions or habits of the mind. Some young people and adults at risk of harm may be vulnerable to radicalisation or being coerced into adopting extreme views of any sort, be they political, religious, economic or environmental, etc.

**‘Extremism’** refers to expression of views which may deny rights to any group or individual and can be manifested as racism, homophobia, far right- or left-wing ideology and any religious extremism. The Counter Terrorism and Security Act 2015 defines extremism as the 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. It may also refer to calls for the death of members of the British armed forces.

**‘Terrorism’** is a threat or physical act of violence for the purpose of advancing a political, religious, racial or ideological cause.

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There is no such thing as a “typical extremist”: those who become involved in extremist actions come from a range of backgrounds and experiences, and most individuals, even those who hold radical views, do not become involved in violent extremist activity.

Students may become susceptible to radicalisation through a range of social, personal and environmental factors - it is known that violent extremists exploit vulnerabilities in individuals to drive a wedge between them and their families and communities. It is vital that college staff are able to recognise those vulnerabilities.

### Indicators of vulnerability include:

- Identity Crisis – the student / pupil is distanced from their cultural / religious heritage and experiences discomfort about their place in society;
- Personal Crisis – the student / pupil may be experiencing family tensions; a sense of isolation; and low self-esteem; they may have dissociated from their existing friendship group and become involved with a new and different group of friends; they may be searching for answers to questions about identity, faith and belonging;
- Personal Circumstances – migration; local community tensions; and events affecting the student / pupil’s country or region of origin may contribute to a sense of grievance that is triggered by personal experience of racism or discrimination or aspects of Government policy;
- Unmet Aspirations – the student / pupil may have perceptions of injustice; a feeling of failure; rejection of civic life;
- Experiences of Criminality – which may include involvement with criminal groups, imprisonment, and poor resettlement / reintegration;

- Special Educational Need – students / pupils may experience difficulties with social interaction, empathy with others, understanding the consequences of their actions and awareness of the motivations of others.

However, this list is not exhaustive, nor does it mean that all young people experiencing the above are at risk of radicalisation for the purposes of violent extremism.

**More critical risk factors could include:**

- Being in contact with extremist recruiters;
- Accessing violent extremist websites, especially those with a social networking element;
- Possessing or accessing violent extremist literature;
- Using extremist narratives and a global ideology to explain personal disadvantage;
- Justifying the use of violence to solve societal issues;
- Joining or seeking to join extremist organisations; and
- Significant changes to appearance and / or behaviour;
- Experiencing a high level of social isolation resulting in issues of identity crisis and / or personal crisis.

**Indicators of Radicalisation:**

Radicalisation can be difficult to detect. Signs that may indicate a person is being radicalised include:

- isolating themselves from family and friends
- talking as if from a scripted speech
- unwillingness or inability to discuss their views
- a sudden disrespectful attitude towards others
- increased levels of anger
- increased secretiveness, especially around internet use

### **Appendix 3: Roles and responsibilities of the (Designated Prevent Lead)**

The Prevent Lead is responsible for:

- Ensuring that staff of the college are aware of him as the Prevent Lead in relation to protecting students from radicalisation and involvement in terrorism;
- Maintaining and applying a good understanding of the relevant guidance in relation to preventing students from becoming involved in terrorism, and protecting them from radicalisation by those who support terrorism or forms of extremism which lead to terrorism;
- Raising awareness about the role and responsibilities of UKBC in relation to protecting students from radicalisation and involvement in terrorism;
- Raising awareness within the college about the safeguarding processes relating to protecting students from radicalisation and involvement in terrorism;
- Acting as the first point of contact within the college for case discussions relating to students who may be at risk of radicalisation or involved in terrorism;
- Sharing any relevant additional information in a timely manner

## Appendix 4: Key Contacts

### 1. When reporting concerns about staff or students:

Contact	Telephone	Email
<b>Prevent Leads/</b>		
Natalia Debek	+44 (0) 2080171622 Ext:421	<a href="mailto:natalia.debek@ukbusinesscollege.org">natalia.debek@ukbusinesscollege.org</a>
Maria Michail	01164670202	<a href="mailto:maria.michail@ukbusinesscollege.org">maria.michail@ukbusinesscollege.org</a>
<b>Police Anti-terrorist Hotline</b>	0800 789 321	
<b>MI5 Threat reporting free-phone</b>	0800 111 4645	

### 2. External Prevent Partners:

Contact	Telephone	Email
<b>OfS Prevent Officers / Advisor</b>		
Toby Brown	0117 931 7340	<a href="mailto:prevent@officeforstudents.org.uk">prevent@officeforstudents.org.uk</a>
<b>East Midlands Regional Prevent Coordinator</b>		
Sam Slack	07384452156	<a href="mailto:sam.slack@education.gov.uk">sam.slack@education.gov.uk</a>