

Merton

College

## Action Plan 2023-24

## **Background to Prevent**

All schools and colleges are subject to a duty under section 29 of the Counterterrorism and Security Act 2015 (the CTSA 2015) the exercise of their functions, to have "due regard to the need to prevent people from being drawn into terrorism". This duty is known as the Prevent duty. <u>Prevent Duty Guidance</u> - statutory guidance for England and Wales, was issued on 7 September 2023 under <u>Section 29 of the Counter-</u> <u>Terrorism and Security Act 2015</u>. It came into force on 31 December 2023. There are no new legal obligations or additional responsibilities for Further Education and Skills providers in the guidance, but the changes provide greater clarity, practical advice, and signpost best practice. Guidance link<u>Prevent-Duty-Guidance-Further-education-and-skills-final-briefing-note-1.pdf</u>

The three Prevent Objectives are:

- Tackle the ideological causes of terrorism
- Intervene early to support people susceptible to radicalisation
- Enable people who have already engaged in terrorism to disengage and rehabilitate

## What are our responsibilities?

The Group has a duty to help prevent the risk of susceptible people becoming terrorists or supporting terrorism. It sits alongside longestablished safeguarding duties to protect people from a range of other harms, such as substance abuse, involvement in gangs, and physical and sexual exploitation. The duty helps to ensure that people who are susceptible to radicalisation are supported as they would be under safeguarding processes.

STCG (South Thames College Group) and associated Colleges must demonstrate an awareness and understanding, shared with partners, of the potential risk of radicalisation in the local area. Those in leadership positions within the Group are expected to:

- Establish or use existing mechanisms for understanding the risk of radicalisation
- Ensure staff understand the risk and build the capabilities to deal with it
- · Communicate and promote the importance of the duty
- Ensure staff implement the duty effectively



Prevent is part of a wider strategy and depends upon effective partnerships and productive cooperation with local Prevent coordinators, the police and local authorities and multi-agency forums. Our safeguarding arrangements must be robust and demonstrate that we can identify children and young people at risk, intervene as appropriate and identify the most appropriate referral. A person's susceptibility to radicalisation may be linked to their vulnerability. <u>A person can be vulnerable</u> if they need special care, support or protection because of age, disability, risk of abuse or neglect. A person's vulnerabilities may be relevant to their susceptibility to radicalisation and to the early intervention approach that is required to divert them away from radicalisation. Although it is important to recognise that not all people susceptible to radicalisation will be vulnerable, and there are other circumstances, needs or other underlying factors that may make a person susceptible to radicalisation but do not constitute a vulnerability.

Our staff must have the knowledge and confidence to identify children and young people susceptible to radicalisation, challenge extremist ideas and know how to refer children and young people for further help. The promotion of the fundamental British Values of democracy, rule of law, individual liberty and mutual respect and tolerance of those with different faiths and beliefs is fundamental to our being able to counter extremism. In addition, the guidance highlights the importance of 'Reducing Permissive Environments' to tackle the ideological causes of terrorism to reduce radicalising influences. This is reflected in our Filtering and Monitoring arrangements set out in the <u>Safeguarding Children</u> and Adults at Risk Policy & Freedom of Speech and Visiting Speaker Policy.

## What is the College trying to achieve?

The College has a statutory duty to deliver the Prevent element of the national counter terrorism strategy. It also has a responsibility to create a dynamic, safe and positive learning environment where students are given the chance to express their views, develop their ideas to become confident aspirational individuals. This is a live document intended for leaders, managers, and governors to engage, review and shape how Prevent is delivered at STCG.



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RAG

GR	REEN – LOW RISK AMBER – MEDUIUM RISK RED – HIGH RISK						
No	Prevent Vulnerability / risk area	Action to Remove or Mitigate Vulnerability	Responsible	When	Update	RAG	
1.a	Staff awareness & understanding Do the following people have a good understanding of Prevent? Board of Governors Executive Team Staff Safeguarding Leads Security Staff Are teaching staff confident to facilitate	All Governors and Exec team must undertake awareness training on Prevent. Prevent and Child Protection refresher training TES Develop modules for all staff. Prevent module required as part of staff induction and for all staff to complete every two years.	Head of Governance	2023 Mandatory schedule dates	All Governors and members of the Executive complete relevant SG training at Induction. Governors Prevent Training delivered by DFE (Department for Education) Coordinator tbc CPD (Continuing Professional Development) Mandatory Schedule published. Prevent refresher completed once every two years. Prevent Duty: Staff% completion 92% On-line Child Protection Refresher completion 92% Additional: 7 <sup>th</sup> February STC face to face Prevent training for STC to be delivered Hate Crime and Prevent Coordinator Wandsworth and Richmond LA Prevent Training delivered at Kingston Jan 24 – 39 attendees.		
	discussion on terrorism and extremism?	Designated Deputy Leads (HoSS) complete DSL (Designated Safeguarding Lead) training.	DSL (VPSS)	On-going	Refresher delivered by Gill Sommers Sept 15 <sup>th</sup> / Viv Hammond Nov 24 <sup>th</sup> – 35 attendees		



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DSL/DDSL and Student Services Team Leaders to receive training on ideologies to enable them to train and advise other staff and support making informed referrals to Prevent where required.	DSL (VPSS)	February 2024		
Permanent contract security staff are included in the 'Prevent' training programme. Sector training offer with FE/HE Regional Prevent Coordinator for London Due Diligence and Counter Extremism Division.	Head of Facilities DSL (VPSS/HoSS)	Sept 2023	Contract Security Staff have completed mandatory staff training modules	
SGO Safeguarding training in online platforms for all staff Prevent FE (Further Education) sector newsletter disseminated to provide sector update with Prevent. Prevent training for staff.	VPSS & HoSS	Ongoing	61 staff attended the Safeguarding Officer Training over two sessions delivered by Gill Sommers. Issue 1 of the SG staff bulletin issued Nov 24. Next issue Jeb 20 <sup>th</sup> .	



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1.b Student understanding Tutorial activities will focus on hate crime All students on full time study programmes HoS/DHoS/CM's and engagement On-going Term 2), misogyny and protected online moodle characteristics. Do students have a good knowledge checks on understanding of Prevent? Safeguarding and Prevent during induction or tutorial. Prevent embedded Is the college a safe place to Jan / Feb within curriculum discuss terrorism and delivery and the tutorial 2024 extremism? programme. Adult learners are provided with the Are external speakers Safeguarding Guide for invited to discuss Prevent? Learners which covers safeguarding including On-going All Adult Induction sessions delivered. AP/HoS Adult Survey inc Prevent and SG radicalization and exploitation. Induction feedback materials provided for PT (Pastoral Tutor) scheme of work adult groups. published / Inspiring Futures 'Be Safe, Be Successful events delivered in November 16-18 Tutorial and Sept 23 / 23 – 1.864 students attended (Group) / Inspiring Futures **VP** Curriculum IAQR review 89% students said that they felt schedule aligned Jan 24 motivated/inspired/informed having against themes. attended a session (s) 96% of students said that the 'health and safety film made me aware of prevent, radicalisation, extremism and key safety advice in the event of an emergency' ALT (Academic Learning Walks - each Leadership Learning Walks schedule 2023-24 / PDBA / Jan 2024 College will undertake Team) Jan 24



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	Learning walks will include BV, Prevent and E-Safety. E-safety hub. Online safety promotion, materials, and guidance available on LRC moodle page including Prevent. Promotion at all LRCs (Learning Resources Centre).	CVP / HLSS	Jan 2024	E-Safety Hub 2023 -24 (Users 2104). Re- promotion to all students in Jan / Feb 2024
	24 will include a lead for Community and Safety at each College site to include focus on	HoSS	Feb 2024	Student Council in place at each college. Student friendly version of AP action plan to Council in Feb 2024.



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2	<b>Safeguarding</b> Do safeguarding and student support service leads, and staff recognise who may be susceptible to radicalization and what to do if they suspect that someone is being drawn into	HoSS attend sector network meetings to disseminate information as appropriate. HoSS to feedback and update safeguarding teams.	HoSS(W) & VPSS	As per the meeting schedule	Regular updates on-going Prevent Network meeting attended. Sector-based updates on Prevent available on STCG ver2 for all staff.
	terrorism? Do safeguarding policies incorporate Prevent?	Prevent Monthly Digest disseminated to all SGO's.	HoSS	Monthly	Completed
		Safeguarding policies incorporate Prevent and radicalization.	VPSS	Annual Review	Safeguarding Children and Adults at Risk Policy 2023-24 updated. Prevent self- assessment tool for FE providers outcomes incorporated into Prevent action Plan for 2023-24.
		Internal posters signpost students if they have a concern to contact Support Services/Safeguarding Officers. Pink Lanyards introduced to identify Safeguarding team.	HoSS	COMPLETED	Updated Safeguarding and Prevent posters / literature have been produced and distributed. Leaflets disseminated through induction.



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3	Safety On-line What filtering/firewall systems are in place to prevent individuals from accessing extremist	All sites use Fortigate NGFW filtering and firewall system. The filtering system part of NGFW is updated automatically twice a	I.T Services	Installed since 2014 On-going	Filtering systems are active, both Real Time and Weekly Summary reports are automatically produced and received by relevant Safeguarding Teams for further analysis.
	accessing extremist websites? Have they been tested recently, are the filtering systems up to date? Do they alert you if someone tries to access extremist sites, do you know what to do if someone does?	day and tested daily. Person (Staff/Students/Visitors) going onto a blocked/filtered site will get a warning on their device screen immediately and are blocked from going any further. Regular report which details username and attempted site access is sent to the relevant Site Safeguarding Team member if any		Installed since 2022. Installed since August 2023	Automated Real Time Reporting of Key Words/Categories Website attempts in place. Reports are sent to members of the Safeguarding Team which detailed username and attempted site access. Automated weekly (Sunday) summary reports are sent to members of the Safeguarding Team which detailed username and attempted site access. Weekly 'Safeguarding' Report is now generated from Fortigate. This has been is being sent to relevant Safeguarding Teams.
		websites Categorised as "Extremist Groups", "Child Abuse", "Explicit Violence", "Drug abuse", "Discrimination", "Weapons (Sales)" is accessed by Staff/Students/Visitor. Automated weekly (Sunday) summary			Currently not possible. 115 students have been flagged as trying to access filtered sites from Sept – Jan (see Safeguarding report)



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reports are sent to members of the Safeguarding Team which detailed username and attempted site access. A 'Key Word' instant alert is under review All staff and students are to confirm if they have read the IT policy as part of the log in process Conclude procurement DSL/DIT March 2024 process for a new filtering and monitoring process **Campus Security** College Annual I.D. Policy implemented. New posters are Visible ID policy in **Principals** displayed across the Group from the start Review 4 place at all campuses. Are learners and staff of Autumn Term. Arrangements and Expectation that staff challenged if they are not procedures for management of visitors and students wear wearing ID? are in place. Reminders issued to all visible ID. Posters How are authorised visitors staff. managed? displayed to reinforce How do you identify and this message. stop unauthorised visitors? Reception is notified if How do they restrict access Monthly visitors are expected. to the campus e.g., swipe, Director of review of Monthly meetings take place with On arrival visitors sign code entry? Facilities Security Contractor, Head of Facilities arrangements and Facilities Contract Manager. with service



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	in and are met by a college staff member. Unauthorised visitors are not given access to	Director of Facilities	provider including staff training.	Ongoing. Meetings were held with Student Services on September 23 to update on campus security matters and student feedback from surveys on feeling safe in college.
	the site, they are unable to access the sites as they are all barrier controlled with swipe card system. Access control is via barriers managed by Security. Staff and	Director of Facilities	On-going	Security Screening Operations Scheduled for Autumn and Spring Term 23/24. Joint operations with Police and Security Company. Schedule for 23/24 in place.
How does the Group ensure compliance to legislation that has been updated or set to be introduced?	students are aware of ID policy and asked to challenge those without ID. Swipe card at main entrances. Variation across College where some key areas also have swipe and keypad access only where enhanced security is			Additional info to be found at https://www.protectuk.police.uk/ For stakeholder engagement via the Home Office – contact <u>dfe.protectandprepare@education.gov.uk</u> Sector updates when received distributed by the HoSS (STC).
	required. Security Screening Operations.	Director of Facilities	2024	Director of Facilities is working with Met Police counter terrorism to ensure compliance. They will assist in conducting a vulnerability assessment of our spaces.



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		'Protect Duty is published and sets out guidance to help better protect visitors, staff and the wider public from terrorism in public spaces under 'Reducing Permissive Environments' to tackle the ideological causes of terrorism to reduce radicalizing influences. There is now a legal obligation for the owners and operators of publicly accessible locations (PALs) to take suitable and proportionate measures to protect the public from terrorist attacks and increase public safety.			
5	Literature/Posters	Leaflets and posters distribution via the College Management Team	College Principals	Annual Review	



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Does permission have to be granted for people to	Principal/APs/HoS. This is strictly		Annual Review	
distribute leaflets?	monitored, and any unauthorised literature	College		
Do people know who to contact if they come across	is removed without warning.	Principals	On- going	
extremist literature?		College		
Do they know what	Staff are aware; line	Principals		
extremist literature looks	manager, Safeguarding			
like?	Team, Duty Managers,			
What happens if individuals	College Management Team.	СМТ		
are handing out leaflets		HoSS	Termly	
outside the institution?	All staff to contact		, constant of the second se	
	DDSL for advice via			
	line managers if unsure of literature			
	The duty manager and			
	members of the			
	Security Team will engage in conversation			
	with them. If it is felt			
	necessary, then this			
	would be escalated to			
	the CMT and Police if			
	appropriate.			
	Termly reminders to all			
	staff			



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**Funding and Resources** External groups are not College Annual Visiting Speakers and Freedom of 6 funded Principals Review Speech Policy refreshed and in place. Do vou fund All monies for community/voluntary/student | fundraising activities groups? must be approved by How do you know that the College monies are not funding Principal/AP/HoS. Specific national extremist activities? Do students/external groups charities such as book your rooms, how do Children in Need. vou monitor if extremist NSPCC. Red Nose activities are taking place? Day External organisations can book rooms College Annual through our Letting Principals Review policy. The Group does not host any activities allied to political parties or religious organisations, apart from when there are elections where planned activity linked to political parties may take place. Annual policy review to ascertain if policy is fit for purpose **Policies and Procedures** College Group level Invacuation (including Where relevant all 7 policies and Principals Lockdown) Policy and Procedure have What policies need to Director of been developed. procedures have been change to incorporate amended and updated. Facilities &



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	Prevent (safeguarding, security, and estate management, disciplinary, behaviour, room booking, and external speakers)?	Serious incident risk assessments reviewed for each campus to determine the appropriate actions if any required for each site.	College Principals		Local College arrangements are owned and managed by College Principals.
		<ul> <li>Lettings Procedures are reviewed annually</li> </ul>	Director of Facilities	Annual Review	
		<ul> <li>Safeguarding Policy- has been updated (reviewed annually)</li> </ul>	DSL	Sept 2023	Safeguarding Children and Adults at Risk Policy updated Sept 2023-24
8	Information Sharing Is there information sharing protocols in place with the Police and the Council? Do the Police know who to	Arrangements are in place for each college. Different local arrangements for Police / Council.	VPSS	Annual Review Nov 2021	Relationships are well established. HoSS work well with their contacts. Police Partnership meetings in place. Liaison officers are allocated one day a
	contact for any issues? Do the Group know who to		HoSS (Centre lead DDSL)	On-going	week at each college.
	contact at the Police? Do other staff members know who the Prevent lead	The Colleges know who to contact in the event of any issues			Safeguarding Children and Adults at Risk Policy Updated and Published Sept 2023. Sector-based updates on Prevent
	at the College is?	and have good relationships with the police who provide intelligence. The	VPSS	Termly	available on STCG ver2 including Prevent Duty Guidance for all staff. Half termly bulleting support staff with ongoing



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		different boroughs have specific Prevent SO15 Officers.			safeguarding and child protection development.
9	Local Authority Partnerships Are you linked with the local Prevent board or regional Prevent FE and HE (Higher Education) group? Do you know who your local	HoSS STC is the Prevent nominee for STCG for the London FE Network Meeting. He attends group meetings and disseminates information to other	HoSS / APSS	Termly	Date t.b.c No meeting since the last reporting period
	authority Prevent coordinator is?	HoSS.	STC		Request to have the AP reviewed by the
	Awareness of key Police and regional HE and FE lead?	Prevent Action Plan to be reviewed with DFE	HoSS/VPSS	On-going	Next meeting is 24/01/2024. Partnership
	Other key partners	Coordinator. HoSS know who their local authority Prevent coordinator is and the key Police contacts.	HoSS/VPSS	Ongoing	has produced support for onsite face to face training scheduled for 7 <sup>th</sup> February 2024 for STC staff – first stage of a wider staff roll-out.
		HoSS would attend required meetings if there are referrals.	HoSS		



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		Information sharing with partnerships on- going. HoSS STC sits on the Strategic Prevent and Protect Group looking at the strategic delivery of Prevent and Protect across the Wandsworth and Richmond Boroughs.			
10	<ul> <li>Freedom of Speech</li> <li>Have you revised and enhanced codes of practice on freedom of speech?</li> <li>Have you developed clearer guidelines on balancing freedom of speech with the need to protect vulnerable individuals?</li> <li>Do you have a risk assessment framework for dealing with requests for external speakers on campus?</li> </ul>	Staff code of conduct and professional practice in place. Visiting Speakers and Freedom of Speech policy in place.	DHR	2023 Annual Review	The code of conduct has been updated. A final consultation exercise is being completed with the unions. Planned release in February 24.
11	<b>Staff and Volunteers</b> Are you vigilant to staff members, volunteers, and	Staff code of conduct and professional practice. All Heads of School/CM's are responsible for	APs	Annual Review	In place and on-going.



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	consultants potentially radicalising learners? Do you have policies and procedures to handle this?	monitoring the daily learning experience of learners. All staff are required to read the code of conduct prior to starting a role at college. If inappropriate activities are identified, then there are clear HR procedures which can be used to deal with the situation. SG Policy and Procedures are also in place to deal with this. Safeguarding Leads/Director of HR/College Principals would escalate.	DRHR DoHR/APSS	Termly Annual Review	The code of conduct has been updated. A final consultation exercise is being completed with the unions. Planned release in February 24. The Group's Disciplinary Procedure and Allegations against Staff Procedure are published for 23-24.
12	Dangerous Substances Is the institution aware of and compliance with all relevant legislation in the storage and handling of dangerous substances including chemicals, bacteria, viruses, and toxins?	Under the group H&S policy and COSHH procedure, HoS and Service Directors are responsible for any 'dangerous substance'. Annual reassurance monitoring exercise and compliance with COSHH are confirmed from those	Head of Facilities	On-going Annual assurance audits carried out	Annual compliance returns for 2023/24 issued by Health and Safety Advisor.



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		HoS/Directors through a return.			
13	Dealing with an Incident Does your critical management plan identify a lead person to deal with terrorist related issues? How will you communicate with and reassure local communities, staff, and learners? Who will deal with the press? How will you identify what partnership support you may require?	There is a Critical Incident and Business Continuity policy and procedure. Identified staff are aware of the part they play in the management of critical incidents. There are clear procedures for each Campus and a reporting system for the reporting and follow-up of incidents and accidents. These are monitored through campus based and college wide health and safety meetings. A Communication plan is part of the above policies. A designated senior manager (GLT (Group Leadership Team)) will deal with all external communications. External support would be called in immediately the	Principals Principals GLT Principals	Annual Review	Business Continuity Plan document is currently being reviewed (October 23) to ensure alignment with Prevent Guidance 2023.



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		situation arises. Close working relationship with the local authorities.			
14	Pastoral and Welfare Support What support is in place for students that are vulnerable to be radicalised? How is the mental health of students supported?	Mental Health Trailblazer Action plan implemented Tutorial Support (section 2) Induction resources (section 2) Student Services and ALS support for students' mental health.	VPSS	On-going	Action plan progress updated/ EWP posts in place. MHP in place. Promotion of wellbeing pathways during Induction (refer to MH action plan).



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Abbreviation	Role	Key Terms
VP	Vice Principal	An <b>ideology</b> is a set of beliefs.
APSS	Vice Principal Student Services	<b>Radicalisation</b> refers to the process by which a person comes to support terrorism and extremist ideologies associated with terrorist groups.
VPHE	Vice Principal HE	<b>Safeguarding</b> is the process of protecting susceptible people, whether from crime, other forms of abuse or from being drawn into terrorism-related activity.
DoHR	Director of HR	<b>Terrorism</b> is an action that endangers or causes serious violence to a person/people; causes considerable damage to property; or seriously interferes or disrupts an electronic system. The use or threat must be designed to influence the government or to intimidate the public and is made for the purpose of advancing a political, religious, or ideological cause.
HoS	Heads of School	Vulnerability describes factors and characteristics associated with being susceptible to radicalisation.
HoSS	Heads of Students Services	<b>Extremism</b> is the vocal or active opposition to our fundamental values, including democracy, the rule of law, individual liberty and the mutual respect and tolerance of different faiths and beliefs. This also includes calling for the death of members of the armed forces.
HoF	Head of Facilities	<b>Channel</b> is a voluntary, confidential support programme which focuses on providing support at an early stage to people who are identified as being vulnerable to being drawn into terrorism. Prevent referrals may be passed to a multi-agency
DHoS	Deputy Head of School	Channel panel, which will discuss the individual referred to determine whether they are vulnerable to being drawn into terrorism and consider the appropriate support required.
СМ	Curriculum Managers	