

<b>Extremism and Anti-Radicalisation Policy</b>	<b>Version:</b>	3.1
	<b>Status:</b>	Final
	<b>Date:</b>	19/09/23

## 1. Approval Record

Name	Role	Date
Rebecca Clarke	Head of People	01/08/20

## 2. Version History

Version	Date	Author	Description (nature of change/update)
0.1	1/6/20	Rebecca Clarke	Initial Creation – Document design proposal
2.0	1/8/20	Rebecca Clarke	Final version
2.1	18/1/21	Rebecca Clarke	Annual review and version control update
3.0	07/10/22	Anthony Melia	Full review of policy
3.1	19/09/23	Anthony Melia	Full review of policy

## 3. Related Documents

Document Title	Location	Version Number
Safeguarding Policy and Procedure	HR system	2.6

## 4. Review and Distribution List

Name	Role	Review Required
Rebecca Clarke	Head of People	Contributor
Anthony Melia	Head of Quality	Contributor
All Staff		For Information Only

## 5. Regulatory Requirements

The government published the 'Prevent' strategy in 2011 as part of its overall counter-terrorism strategy, CONTEST. 'Prevent' duty guidance, first published in February 2015, was put into place in the further education and skills sector on 18 September 2015. As a result, all further education and skills providers in England must have 'due regard' to the need to 'Prevent' people from being drawn

into terrorism. This policy has been updated in line with the updated Prevent Duty Guidance published in September 2023.

## 6. Introduction

### 6.1 Purpose

These policy outlines We Are Digital 's (WAD's) commitment to protect our employees, subcontractors, partners, learners, and service users from being drawn into terrorism or related activities.

This policy supports the PREVENT duty as part of the Counter Terrorism and Security Act (2015) and is set to develop a framework of knowledge required to understand how to recognise signs of extremism and radicalisation demonstrated by staff, subcontractors, or customers. The policy is part of the overall safeguarding policy.

WAD is committed to freedom of speech and these guidelines seek to maintain this approach within the regulatory framework.

WAD are committed to protecting vulnerable or troubled individuals from being drawn into terrorism or related activities. Where such actions do not infringe an individual's privacy and Data Protection legislation, WAD will seek to identify, protect, and support those whom we believe may be at risk of being drawn into terrorism. WAD shares its responsibility for its Prevent actions with other organisations such as the Police and Local Authorities.

All decisions made using these guidelines as its basis will be based on evidence and reasoned argument. Any other approach would be undemocratic and an infringement of freedom of speech and freedom of rights.

WAD will conduct a risk assessment to identify any potential risks associated with staff, learners, or others being drawn into terrorism. This will be updated as appropriate. WAD will act on any identified risks to with remove such risk or mitigate them.

WAD will ensure that staff understand how to obtain support for staff, learners or others who may be being exploited by radicalising influences, as required in paragraph 19 of the undated Prevent duty guidance produced by HM Government.

WAD will ensure that relevant staff involved in the Prevent process are provided with appropriate training as outlined in paragraph 20 of the undated Prevent duty guidance.

WAD will be in regular communication with the Regional Prevent Co-ordinators and the police to obtain information about risks in key geographical areas and to maintain active communication on matters that may relate to those in scope.

WAD will maintain an External Speaker Policy which will guide WAD's actions and decisions in regard to topics including the use of any external speakers. This will be reviewed on a regular basis and will set out the process where it is determined that this is required.

Nominated individuals will attend external events and updates on Prevent issues and current threats. These individuals then have the responsibility to cascade updates and information.

In the event of a member of staff identifying concerns about another member of WAD staff potentially being drawn into violent extremism or radicalised behaviour, based on information received or behaviour observed they have a responsibility to report their concerns. This may include that noticing that a colleague, learner, or other key stakeholder has become withdrawn or that they are acting differently. This will only be a starting point for gathering further information or evidence.

WAD will safeguard the identity of those making the accusations whilst still protecting the rights of those being accused. WAD will only share information with other agencies when there is both clear and compelling evidence of a requirement to do so, or strong enough reasonable concern to do so.

Where staff or learners / users have concerns that another learner or colleague is expressing violent extremist views or is at risk of being drawn into violent extremism, these concerns should be passed to the Designated Safeguarding Lead and Designated Safeguarding Officer. The relevant party will investigate the accusation and will look at whether there is substantive evidence, in which case more investigation or further action will be needed.

Once this review has been completed, where possible, the individual completing the investigation will be expected to make one of three possible decisions:

- Unfounded or speculative allegations will mean that no further action is required apart from a confidential record of the case being kept by the DSO / DSL.
- If there is some minor substance to the allegations or investigations outcome it will only need internal action in the first instance.
- The exact nature of the intervention required would be determined by discussions between relevant staff. Actions and a review date will be agreed. At the review, the case would be assessed again, and any appropriate action(s) taken.

All staff may discuss matters affecting their personal or professional lives with the line manager.

## 6.2 Scope

This policy applies to:

- employees (individuals who work – or have applied to work for We Are Digital either on a permanent, temporary, contractual, or voluntary basis).
- Subcontractors and partners delivering who are in receipt of and/or are providing We Are Digital services on our behalf.

Failure to adhere to this and associated policies, will lead to disciplinary proceedings up to and including dismissal.

NB: When working on external sites/establishments all employees need to make themselves familiar with any policies relevant to the specific working location.

Some employee groups may have contractual requirements to undertake training, or work to standards as stated within local Safeguarding Policies and Procedures. We Are Digital will ensure that those employees who are subject to these additional requirements are aware of these responsibilities.

In instances where there are serious and immediate concerns or threats to the safety or wellbeing to the individual, to WAD or others (internal or external) and / or there is evidence to suggest a criminal act may be committed or has been committed, an immediate referral will need to be made to the police and Prevent Regional Co-ordinator. This decision will be taken in the most circumstances and



by the Designated Safeguarding Lead. In all cases where the DSL is not available, decisions will be taken by the DSO, in conjunction with the with a member of the SLT.

In all cases a confidential record will be created and stored by the DSL or DSO and the Managing Director (MD) will be informed.

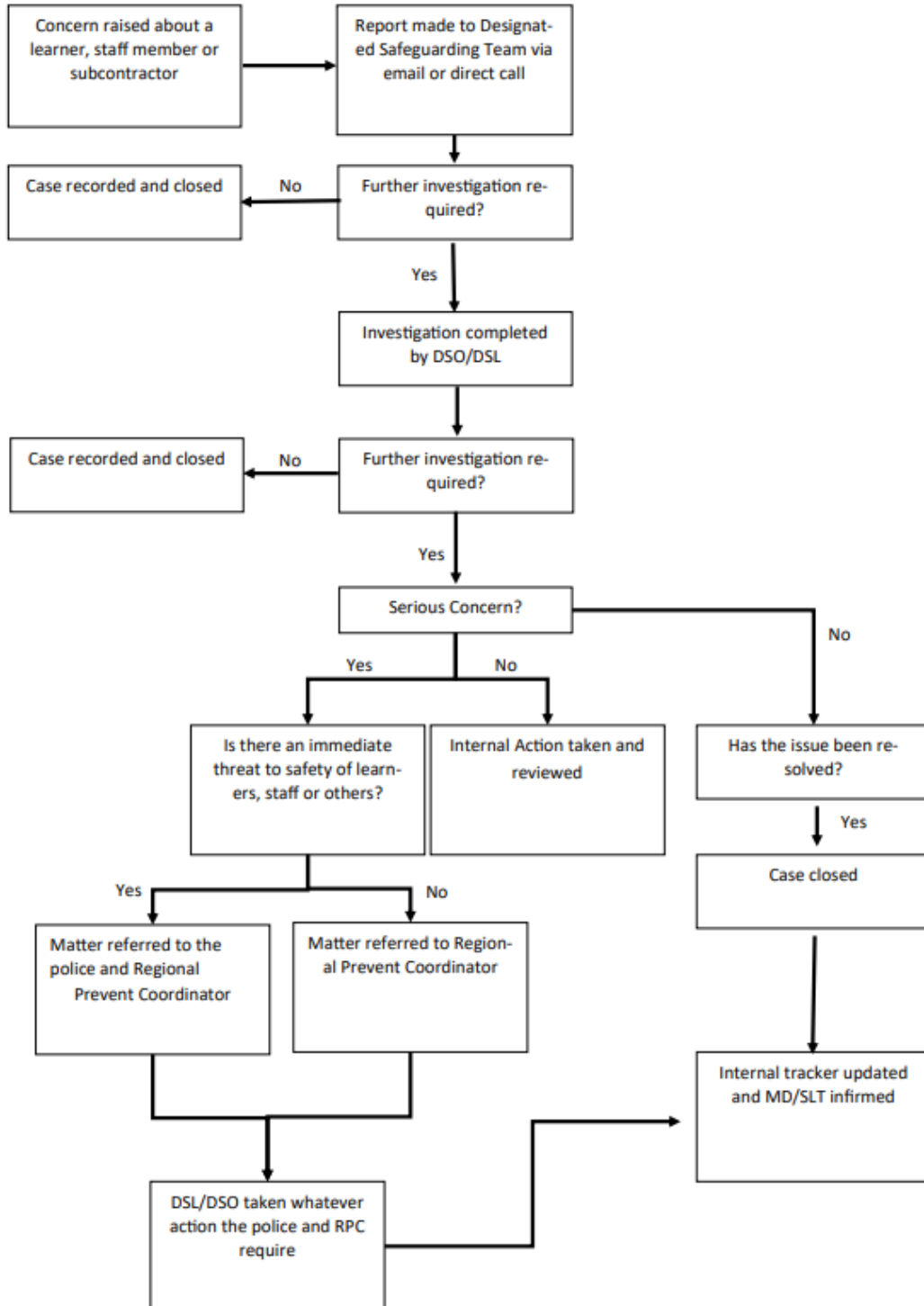
In reaching a decision to share any information with third parties, WAD will adhere to its Data Protection responsibilities.

As permitted by the Data Protection legislation we can share personal data with certain external parties in certain circumstances. Usually relating to prevention and detection of crime or health and safety of the individual or others.

Any referral to an external body will involve the sharing of only sufficient relevant information which would allow the further investigation by the relevant authorities.

WAD will retain confidential records of all information shared this information will only be accessible by the DSO, DLS, MD or specified members of the SLT.

## Flowchart Process for Reporting Prevent Duty and Safeguarding Concerns



## 7. Roles and Responsibilities

RACI	Role	Role Holder(s)	Key Responsibilities
Responsible	Process SME	Rebecca Clarke	<ul style="list-style-type: none"> <li>Ensuring process document accurately reflects current practice</li> <li>Contributing to process changes and improvements, as and when identified</li> </ul>
Accountable	Process Owner	Anthony Melia	<ul style="list-style-type: none"> <li>Overall ownership and accountability for process definition and execution</li> <li>Leading change for improving the process</li> <li>Approval point for any changes/update to the process definition</li> <li>Ensuring that any changes are properly documented and communicated</li> <li>Ensuring that ongoing monitoring is in place and conducted</li> </ul>
Consulted	Head of Quality	Anthony Melia	<ul style="list-style-type: none"> <li>Monitoring adherence to agreed process through periodic quality reviews</li> </ul>
Informed	All Staff Subcontractors	Anthony Melia	<ul style="list-style-type: none"> <li>Read and accept of document must be completed in HR system</li> <li>To be included in subcontractor paperwork</li> </ul>

## 8. Prevent – Detailed overview

### 8.1 Prevent

This is the government strategy to target terrorist groups in the UK and abroad. The main focus is to prevent repeats of terrorist acts such as the devastating attacks that killed fifty-two people in London on the 7th of July 2005. There are four strands to the strategy:

- Pursue – to stop terrorist attacks
- Prevent – To stop people becoming terrorists or supporting terrorism
- Protect – to strengthen our protection against a terrorist attack
- Prepare – to mitigate the impact of terrorist attacks

### 8.2 Channel

This is a multi-agency approach to support individuals who are being radicalised by others. Once a person has been identified, positive action is taken by representatives from the police, social care, and education to engage the person in alternative activities.

They are also given a mentor to help them discuss their views and ideas which is especially useful if they have distorted views on religion or politics. It is important to highlight that this process is there for genuine concerns about an individual and not someone who has radical ideas about a subject.

Many people who begin to show signs that they are being radicalised show other characteristics such as mental health problems, drug or alcohol abuse and other symptoms which make them

vulnerable. We must remember that many young people develop opinions and ideas as they become more independent, and this does not necessarily mean that they are being radicalised.

### 8.3 Aims & Principles

All staff and subcontractors are committed to safeguarding at We Are Digital and are fully aware of the dangers of the radicalisation of children and young people. This policy supports our responsibility to protect individuals in association with other local and national agencies.

The key principals are that those with direct interaction with customers / learners / trainees / apprentices will:

- Have received training on this policy and understand the signs related to radicalisation. In addition, they know the procedures in any disclosures or concerns about a child or young person.

### 8.4 Tackling Extremism

We Are Digital wishes to create a tolerant and safe environment for learners to learn and achieve. In tackling extremism, we will be vigilant in looking for signs of extremist behaviour and all staff will be aware of the procedures in place for reporting concerning behaviour.

Evidence of extremist behaviour may take the following form:

- Disclosure by individual about extremist or radicalised behaviour
- Use of specific terms that are associated with specific ideological views e.g. use of 'hate' language
- Intelligence reports from local and national agencies regarding the radicalisation of groups of people in a locality
- Focus on specific narratives that highlight particular extremist views
- Evidence of accessing online materials (including social media sites) that include extremist materials
- Refusal to accept views expressed by others which counter Equality legislation
- Concerns raised by family members or carers about the changing behaviour of their child / adult at risk
- References to an extremist narrative in learner's work

### 8.5 Making a Judgement

When making a judgment, staff will ask themselves the following questions:

- Does the individual have access to extremist influences through the internet e.g. via closed network groups or through liaison with organisations or members of the community?
- Does the individual possess or actively seek extremist literature/other media likely to incite racial or religious hatred?
- Does the individual sympathize or support extremist groups or behaviour in their vocal support for terrorist attacks or in their written work?
- Does the individual's outward appearance suggest a new social, religious, or political influence e.g. jewellery, tattoo, clothing?
- Has the individual been a victim of a race hate or religious crime?

- Has the individual had major disagreements with peers, family or faith groups which has led to rejection, isolation, or exclusion?
- Does the individual display an irregular and distorted view of religion or politics?
- Does the individual show a strong objection to specific cultures, races, or religions?
- Is the individual a foreign national awaiting a decision about deportation or immigration?
- Is there an irregular pattern of travel by the individual's family?
- Has the individual witnessed or suffered from trauma or violence in a war zone or through sectarian conflict?
- Is there evidence of a relative or family friend having extremist views?

## 8.6 Referrals

In line with our safeguarding procedures, staff / subcontractors are fully aware of reporting extremist behaviour. The following system for referrals is as follows:

- Any disclosures or concerns of extremist behaviour should be referred to the named Designated Safeguarding and Prevent Lead
- All incidents will be investigated in line with current policies and evidence will be recorded and retained
- Parents/carers or where appropriate clients such as Housing Associations where we will communicate directly with their safeguarding team will be contacted and the issue will be discussed with them to investigate whether there are any mitigating home circumstances. A decision will be made at this meeting to look at any further external agency support and whether a referral should be made.

## 8.7 Training

Staff and Sub contractors will be required to complete the online PREVENT training along with additional learning on safeguarding and related topics prior to them being approved to deliver training. This will be renewed on an annual basis unless guidance dictates an earlier refresher for example learnings from handling a case.

## 8.8 Additional Materials

Prevent Duty Guidance <https://www.gov.uk/government/publications/prevent-duty-guidance>

Department Of Education - Protecting children from radicalisation: the prevent duty

[The Prevent duty: safeguarding learners vulnerable to radicalisation - GOV.UK \(www.gov.uk\)](https://www.gov.uk/government/publications/the-prevent-duty-safeguarding-learners-vulnerable-to-radicalisation)

Department of Education – Keeping children safe in education

<https://www.gov.uk/government/publications/keeping-children-safe-in-education--2>

Department Of Education & Home Office – The use of social media for online radicalisation

<https://www.gov.uk/government/publications/the-use-of-social-media-for-online-radicalisation>



## 9. Quality Control Log

No	Risk/Issue	Control	Control in Place Y/N
1	Inaccurate or incomplete data processing	Staff and contractors to provide copies of certificates to be kept on file	Y

## 10. Glossary

Term	Description
Radicalisation	Radicalisation is a process by which an individual or group comes to adopt increasingly extreme political, social, or religious ideals and aspirations
Extremism	Extremism the holding of extreme political or religious views
Propaganda	Propaganda information, especially of a biased or misleading nature, used to promote a political cause or point of view
Terrorism	For the purposes of these guidelines, terrorism is interpreted as the definition provided by The Terrorism Act 2000 as "The use or threat of action designed to influence the government or an international governmental organisation, or to intimidate the public, or a section of the public; made for the purposes of advancing a political, religious, racial or ideological cause."
Bias	Bias inclination or prejudice for or against one person or group, especially in a way considered to be unfair
Refugee	Refugee a person who has been forced to leave their country in order to escape war, persecution, or natural disaster
Migrant	Migrant a person who moves from one place to another in order to find work or better living conditions
ISIS / Daesh	ISIS/Daesh is a Wahhabi/Salafi jihadist Islamic extremist militant group. It is led by and mainly composed of Sunni Arabs from Iraq and Syria
Far Right	Far-right politics are right-wing politics to the right of the mainstream centre right on the traditional left-right spectrum. They often involve a focus on tradition as opposed to policies and customs that are regarded as reflective of modernism.
Self-Initiated Terrorism	Self-initiated terrorism refers to acts of violence or terrorism carried out by individuals or small groups without direct external influence or command, often driven by personal beliefs, grievances, or radical ideologies.
Extreme Left-Wing Terrorism	Extreme left-wing terrorism involves acts of violence or terrorism carried out by individuals or groups who adhere to radical leftist ideologies, seeking to promote their political, social, or economic agendas through violent means.