



**PREVENT**  
**RISK ASSESSMENT and ACTION PLAN 2026**

## **Key Contacts**

	<b>Name</b>	<b>Grow 19 contact information</b>
<b>Principal</b>	Matthew Jones	mjones@grow19.com
<b>Safeguarding Board Member</b>	Dr Shobha Ravindra	Contact through SLT Admin

# Grow 19

## Anti-terrorism Act 2015

### Prevent Duty Risk Assessment

#### Introduction

From 1 July 2015 providers are subject to a duty under section 26 of the Counter-Terrorism and Security Act 2015, in 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. It applies to a wide range of public-facing bodies. Bodies to which the duty applies must have regard to the statutory guidance. Paragraphs 141-210 of the guidance are concerned specifically with colleges and childcare providers. This policy complements the statutory guidance and refers to other relevant guidance and advice.

[Prevent duty guidance: for England and Wales \(accessible\) - GOV.UK](#)

#### Prevent Duty

Section 26, the Prevent duty came into force on the 1st July 2015 (Latest revision March 2024) and places a duty on specified authorities to have “due regard to the need to prevent people from being drawn into terrorism” and challenge extremist ideas that support or are shared by terrorist groups.

Further education establishments are specified authorities for the purpose of the act and the duty applies to ALL.

Colleges are expected to take a “Risk based approach”. All colleges, as a starting point, should demonstrate an awareness and understanding of the risk of radicalisation in their area. This risk will vary greatly and can change rapidly; but no college is risk free.

This policy has been developed in accordance with the principles established by the Learners Acts 1989 and 2004 and related guidance. This includes but is not limited to:

- Keeping Learners Safe in Education (KCSIE)
- Working Together to Safeguard Learners (WTSC)
- Ofsted: Education Inspection Framework
- Framework for the Assessment of Learners in Need and their Families 2000
- [Kent and Medway Safeguarding Learners Procedures](#)
- Early Years and Foundation Stage Framework (EYFS)
- The Education Act 2002
- Education and Inspections Act 2006
- The Education (Independent College Standards) Regulations 2014
- The Non-Maintained Special Colleges (England) Regulations 2015
- The Human Rights Act 1998
- The Equality Act 2010 (including the Public Sector Equality Duty)

This policy is one of a series in Grow 19’s integrated safeguarding portfolio and should be read and actioned in conjunction with the policies as listed below:

- Adult Protection and Online safety Policy
- Behaviour and Physical Interventions
- Searching, screening and confiscation
- Anti-Bullying
- Data protection and Information sharing
- Sexual Violence and Harassment
- Personal and intimate care
- Health and safety
- Risk assessments (e.g. college trips, use of technology, college re-opening)
- First aid and accidents
- Managing allegations against staff
- Staff code of conduct
- Staff acceptable Use of Technology Policies (AUP)
- Safer recruitment
- Whistleblowing
- Low level concerns

At Grow 19 we are tasked, not just with teaching learners, developing, knowledge and understanding; another major part of our role is to look after and keep learners safe, helping them to develop skills and attitudes that help us to live together in an increasingly diverse society.

Safeguarding is about 'keeping all vulnerable adults safe in education' and promoting the welfare of learners. It is defined by the UK Government as –

- *protecting learners from maltreatment*
- *preventing the impairment of learners mental and physical health or development*
- *ensuring that learners grow up in circumstances consistent with the provision of safe and effective care, and*
- *taking action to enable all learners to have the best outcomes*

*DfE Keeping Learners Safe in Education*

To do this effectively all staff need to know

*'..... the context in which our learners live.'*

### **The Prevent duty: what it means for college**

In order for college to fulfil the Prevent duty, it is essential that staff are able to identify learners who may be vulnerable to radicalisation and know what to do when they are identified. Protecting learners from the risk of radicalisation should be seen as part of colleges wider safeguarding duties and is similar in nature to protecting learners from other harms (e.g. drugs, gangs, neglect, sexual exploitation), whether these come from within their family or are the product of outside influences. Colleges can also build learners resilience to radicalisation by promoting fundamental British values and enabling them to challenge extremist views.

It is important to emphasise that the Prevent duty is not intended to stop learners debating controversial issues. On the contrary, colleges should provide a safe space in which learners, young people and staff can understand the risks associated with terrorism and develop the knowledge and skills to be able to challenge extremist arguments.

## **British Values**

Grow 19 College has a duty to 'actively promote' the fundamental British values of democracy, the rule of law, individual liberty, and mutual respect and tolerance of those with different faiths and beliefs. We do this through an appropriate and robust curriculum appropriate to learners' level of need and understanding.

## **Local Picture**

Prevent is part of CONTEST, one of the four elements of the Government's Counter Terrorism Strategy. The aim of the **Prevent Strategy** is to stop people becoming terrorists or supporting terrorism. Prevent tackles all forms of extremism - including both Islamist extremism and far right threats. This is achieved by challenging terrorist ideology; supporting vulnerable people and supporting sectors and institutions where there are risks of radicalisation.

Kent County Council and Medway Unitary Authority have the lead role in delivering the Prevent Strategy in Kent and Medway in accordance with the **Prevent Duty Guidance** and work with partners such as the Police and Health.

Prevent has three key objectives:

- respond to the ideological challenge of terrorism
- support vulnerable people and prevent people from being drawn into terrorism
- work with key sectors and institutions to address the risks

Prevent is a formal duty for Kent County Council and Medway Unitary Authority under the **Counter Terrorism and Security Act 2015**. We all have a role in protecting vulnerable learners, young people and adults from being drawn into terrorism, keeping Kent and Medway safe. Extremism and radicalisation in our community are very real and being aware is the first step. You can help reduce the threat from terrorism, radicalisation, and extremism by **being vigilant**, knowing what to report and reporting it.

Prevent works with individuals and communities by using voluntary early intervention to encourage them to challenge extremist and terrorist ideology and behaviour. This can involve:

- support in colleges, youth clubs, and community groups
- promoting positive values and community cohesion
- protection from extremist dialogues
- encourage safe and open debate and critical thinking
- encouraging reporting of concerns
- engage in positive activities
- engaging in open and honest dialogue around prevent

## **What is Channel?**

Channel is a key element of the Prevent Strategy and Local Authority Channel Panels are a statutory requirement under the Counter Terrorism and Security Act 2015. Channel Panel is a multi-agency

approach to identify and provide support to individuals who are at risk of being drawn into terrorism, including people holding and expressing violent extremist views. The overall aim of the programme is early intervention and diverting people away from potential risk. Channel involves agencies working together to give individuals access to services such as health and education, specialist mentoring and diversionary activities - Channel can (uniquely) provide theological or ideological mentoring. For those requiring support an appropriate package is offered based on an assessment of their vulnerability.

Unlike mainstream safeguarding for adults and learners, there is no threshold to make a Prevent referral for an individual to access assessment and specialist support. There may be cases that require a safeguarding response in conjunction with Prevent. Channel provides early support for anyone who is vulnerable to being drawn into any form of terrorism or supporting terrorist organisations, regardless of age, faith, ethnicity, or background. Individuals can receive support before their vulnerabilities are exploited by those who want them to embrace terrorism, and before they become involved in terrorist -related activity. While it remains rare for learners and young people to become involved in terrorist activity, young people from an early age can be exposed to terrorist and extremist influences or prejudiced views. As with other forms of safeguarding strategies, early intervention is always preferable.

### **What is Dovetail?**

Dovetail was introduced as a pilot programme in several areas across the country, including Kent. The pilot assessed the feasibility of transferring the resources and responsibility for administering the programme and case management aspects of Channel from the Police to local authorities. Dovetail has been in place in Kent since 2016 and Medway since late 2020 and continues to be the process by which Channel is managed.

### **How do I report concerns?**

- When a concern is identified, the 'notice, check, share' procedure should be applied as outlined in the Prevent duty awareness course.
- If you have immediate concerns about the welfare of any persons, then contact the Police by calling 999.
- **make a referral** - if you have any concerns or are unsure about making a referral then discuss it with your organisation's safeguarding lead/Prevent lead and/or contact the Kent and Medway Prevent Team by emailing **prevent@kent.gov.uk**
- Contact the Kent and Medway Prevent and Channel Manager, Jess Harman by emailing **jess.harman@kent.gov.uk**
- Once you have completed this form it is essential that you submit it to the police directly, or your Designated Safeguarding Lead (DSL) or equivalent will do this on your behalf. For Kent and Medway all forms must be submitted to **preventreferrals@kent.police.uk**
- Where possible you will receive a response on your referral, but this is not always possible due to data-protection considerations and other sensitivities.
- On page 1 of the referral form, it includes advice for members of the public – **https://actearly.uk/contact** The referral form is for 'specified authorities' only – i.e.

people with Prevent responsibilities according to the CTSA, **although police are happy to accept referrals from the public on the form.**

- Members of the public can call the Act Early Support Line on 0800 011 3764 in confidence to share your concerns or call the anti-terrorism Hotline on 0800 789 321
- If you are deaf, hard of hearing or have a speech impairment, a police non-emergency number is available as a text phone service on 18001 101. Remember, in an emergency dial 999
- **report online material promoting terrorism or extremism**

Terrorist attacks can sadly lead to spikes in hate crimes against certain groups, and many people in communities across the country are likely to feel vulnerable. Such action is not tolerated, is taken extremely seriously, and should always be reported.

**View guidance on reporting hate crime**

**How can I support Prevent?**

- Be vigilant - radicalisation is usually a process, not an event, and factors or events may contribute towards the radicalisation for an individual
- Familiarise yourself with the factors that contribute towards radicalisation and how to make a Prevent referral
- Please make sure that you are up to date with your Prevent training and have a clear understanding of the Prevent Duty, how to make Prevent referrals as well as knowing who your Prevent lead is for your organisation - and check that they are receiving regular updates. This is statutory training for all staff at Grow 19 college.
- Complete Prevent e-learning and contact the Kent and Medway prevent team for further training. [Prevent@kent.gov.uk](mailto:Prevent@kent.gov.uk)

Kent and Medway Prevent team training offer –

- Education information contact the Prevent Education officers and [The Prevent Duty In Education - KELS!](#)

**Prevent is a shared responsibility. Don't rely on others - report any concerns you have immediately.**

**Kent and Medway Prevent Team**

**Assistant Director Contest and Serious Organised Crime – Nick Wilkinson**

Strategic lead for Prevent and Channel at Kent County Council, Chair of Kent and Medway Channel Panel. Chair of Southeast Prevent and Channel Chairs meeting. Lead officer for Kent Community Safety Agreement priority of Preventing Extremism and Hate.

Email [nick.wilkinson@kent.gov.uk](mailto:nick.wilkinson@kent.gov.uk)

**Prevent and Channel Manager – Jess Harman**

Manages delivery of Prevent and Channel activity across Kent and Medway. Promotes and delivers the Prevent Strategy across both statutory and non-statutory partners. Develops and oversees the Prevent partnership plan and Counter Terrorism Situational Risk Assessment. Co-chair of the Kent and Medway Cross Directorate Groups. Delivers Prevent support and training to a range of agencies.

Email: [jess.harman@kent.gov.uk](mailto:jess.harman@kent.gov.uk)

**Prevent Community Engagement Officer (PCEO) – Nadine Permaul**

Supporting Kent and Medway communities and encouraging engagement with Prevent. Promoting awareness and addressing misconceptions of Prevent to build resilience and confidence within communities. Improving outreach and awareness and working with partners to ensure local and emerging needs are addressed.

Email: [Nadine.Permaul@kent.gov.uk](mailto:Nadine.Permaul@kent.gov.uk)

**Prevent Education Officers (PEO) by district:**

**Sally Green (Medway and North/West Kent)**

**Rachel Murray (South and East Kent)**

Emails: [sally.green2@kent.gov.uk](mailto:sally.green2@kent.gov.uk) and [Rachel.Murray@kent.gov.uk](mailto:Rachel.Murray@kent.gov.uk)

**Prevent Duty Risk Assessment and Action Plan Grow 19 College**

The UK Government have classified the risk of terrorism in the UK as 'Severe'

The risk assessment below has been developed but must be considered in line with learner cognitive understanding, appropriateness in line with their SEND

<b>Compliance Requirements</b>	<b>Yes/No/High/Medium Low</b>	<b>Action required</b>
The risk to our learners of being drawn into terrorism has been assessed and is considered to be:	Low/medium	Ensure awareness training is up to date for all staff (annually September). Staff are aware of the procedures to raise concerns using Myconcern or Myconfide and to report to a DSL immediately if urgent.
The risk to our learners of being radicalised and supporting terrorism has been assessed and is considered to be:	Low/medium	Educating learners, when appropriate about risk, through relevant curriculum. Ensure awareness training is up to date for all staff. Training for staff is delivered through Sally Green (Prevent officer) also at point of induction as part of safeguarding training. Specific PREVENT awareness training from the National College this is online training. Further updates provided during Tuesday briefing updates. Board are provided with safeguarding training which includes exploitation, PREVENT and extremism. Staff are aware of the procedures to raise concerns.
<b>Training Requirements</b>	<b>Yes/No/High/ Medium/Low</b>	<b>Action required</b>
Have all staff been trained to understand the Prevent duty?	Yes	This information is held by HR, staff are

		required to complete the Home office prevent training or National college prevent training as part of their induction. Prevent Duty delivered through Sally Green during whole college INSET September 2025 and through whole college briefings. Lead DSL has completed the basic awareness and referral training.
Has the role of the Designated lead for child protection been extended to lead on inter-agency liaison in respect of the Prevent duty?	Yes	The DSL or deputies will liaise with appropriate agencies in line with prevent requirements and using the recognised referral mechanism <a href="#">Report radicalisation or extremism (Prevent) - Kent County Council</a>
Do all your staff know who to refer to in respect of a child being at risk of radicalisation and extremism?	Yes	Prevent training is included in the annual CP refresher, safeguarding briefings and all staff complete the statutory prevent training upon starting.
<b>College Policies</b>	<b>Yes/No/High/Medium/Low</b>	<b>Action required</b>
Does the Adult Protection Policy refer to the new duty of the Designated lead and the Prevent guidance? (Online Safety policy is part of this)	Yes	Ensure this information remains included with ongoing policy updates.
Has your college got a clear statement about the Prevent duty on your website and in the prospectus?	Yes	<a href="#">Grow 19</a>
Does the college have clear guidance on the use of prayer rooms for faith related activity?	Yes	We do not have a permanent prayer room however a room of appropriate size and location will be provided when required.

Does the college have clear guidance for visitors including faith related visiting speakers?	Yes	HR have developed guidance regarding visitors. Visitors are thoroughly vetted through DBS, volunteers are interviewed and references sought. Relevant staff ie the class teacher or SLT meet with visitors to ensure that they do not have extremist views and opinions. Visitors are given advice and guidance on what information should be shared with learners. There is a Visitor's Acceptable Use policy, and they are provided with safeguarding information.
<b>British Values</b>	<b>Yes/No/High/Medium/Low</b>	<b>Action required</b>
Has the college got a clear strategy for embedding these values and be able to demonstrate how their work with learners has been effective in doing so?	Yes	As appropriate to learner understanding delivered through curriculum offer, this is reviewed termly to ensure efficacy. Learners where appropriate learn about and complete PREVENT training
Our learners have an understanding of how citizens can influence decision-making through the democratic process	Low	Grow 19 is a college for learners with SEND, the curriculum is developed as appropriate to the needs and understanding of cohorts of learners. Learners understanding varies.
Our learners have an understanding that the freedom to hold other faiths and beliefs is protected in law	Low	Grow 19 is a college for learners with SEND, curriculum is developed as appropriate to the needs and

		<p>understanding of learners.</p> <p>Learners understanding varies.</p>
<p>Our learners have an acceptance that people having different faiths or beliefs to oneself (or having none) should be accepted and tolerated, and should not be the cause of prejudicial or discriminatory behaviour</p>	<p>Low</p>	<p>There is a Child-on-Child Abuse policy which is reviewed annually.</p> <p>There is an Anti-Bullying policy.</p> <p>Grow 19 has a zero tolerance of prejudicial and discriminatory behaviour.</p> <p>Staff are trained to identify and report such incidents and not to dismiss them.</p> <p>Staff model tolerance and acceptance of people having different faiths or beliefs.</p> <p>There is a staff relationship guidelines document which reinforces this.</p>
<p>Our learners understand the importance of identifying and combatting discrimination</p>	<p>Yes</p>	<p>Some learners, where appropriate to cognitive ability, have awareness of this.</p> <p>All learners are taught to be accepting of difference which learners model through their behaviours and interactions with peers.</p>
<p>Does the college ensure all learners have a voice that is listened to, and demonstrate how democracy works by actively promoting democratic processes such as a college council whose members are voted for by the learners?</p>	<p>Yes</p>	<p>There is a college council.</p> <p>Learner voice is captured through questionnaires and opportunities to provide their opinion.</p> <p>Learners contribute to section A of their EHCP.</p>
<p>Does the college include in suitable parts of the curriculum - as appropriate for the age of learners - material on the strengths, advantages and disadvantages</p>	<p>Yes</p>	<p>Where appropriate to the cognitive abilities of the learners.</p>

of democracy, and how democracy and the law works in Britain, in contrast to other forms of government in other countries?		
Does the college use opportunities such as general or local elections to hold mock elections to promote fundamental British values and provide learners with the opportunity to learn how to argue and defend points of view?	Yes	Where appropriate to the cognitive abilities of the learners. Learners visit the local courts to develop their understanding of the criminal justice system.
Does the college use extra-curricular activity, including any run directly by learners, in promoting fundamental British values?	Yes	The college offers residential trips which are used to develop learner resilience, independence, communication, collaboration, social skills and their understanding of differences in others including fundamental British values.

**Our Designated Lead for Prevent is Matthew Jones, Principal**

**Appendix Staff checklists (HR)**



**Agency and Contractor staff checklist**

Name	
Agency/ Organisation	
Start Date	
End date	

Document Type seen	Date seen	Seen by
Compliance document		
DBS Certificate		
Identity of individual confirmed		

Question	Yes/No	Date asked
Safeguarding information given?		

Any concerns identified?

Staff member inspecting	Signature	Date signed

**Once completed, staple to the comfort document and store.**



**Contractor's compliance form**

To ensure our Single Central Record (SCR) is compliant we require the below information. If you are unable to provide us with the below information the candidate will not be able to work at Grow 19 College.

If you have any questions regarding the below, please do not hesitate to contact the Human Resources department on 01622 743925 or alternatively via e-mail [hr@five-acre.kent.sch.uk](mailto:hr@five-acre.kent.sch.uk)

<b>Candidate Name:</b>	
<b>Position:</b>	
<b>Start Date:</b>	
<b>End Date:</b>	
<b>Has an enhanced DBS check been completed? (this should include a child and adult barred list check)</b>	<b>Yes/No</b>
<b>DBS Number:</b>	
<b>Has the candidate been given our Safeguarding policy</b>	<b>Yes/No</b>

Name: \_\_\_\_\_

Organisation: \_\_\_\_\_

Date: \_\_\_\_\_

### **External links**

<https://www.kent.police.uk/advice/advice-and-information/t/prevent/prevent>

- DfE Counter Extremism Helpline:
- Call: 020 7340 7264
- Email: [counter.extremism@education.gsi.gov.uk](mailto:counter.extremism@education.gsi.gov.uk)
- National Police Prevent advice line [0800 011 3764](tel:08000113764)

[Report radicalisation or extremism \(Prevent\) - Kent County Council](#)

[Managing risk of radicalisation in your education setting - GOV.UK](#)

[The Prevent duty: an introduction for those with safeguarding responsibilities - GOV.UK](#)

[Prevent duty guidance factsheet – Home Office in the media](#)

[Prevent duty guidance: for England and Wales \(accessible\) - GOV.UK](#)

[Prevent - Kent Safeguarding Learners Multi-Agency Partnership](#)