Prevent Policy

DHA adopts a whole-provider approach to Prevent, ensuring that safeguarding, wellbeing, equality, diversity and inclusion, British Values and learner voice are embedded throughout the learner journey. Prevent effectiveness is monitored through learner feedback, observations, quality assurance activities, audits, risk assessments, staff training records and governance oversight.

Legislative Framework

This policy is informed by and should be read alongside:

- Counter Terrorism and Security Act 2015.
- Prevent Duty Guidance for England and Wales.
- Department for Education (2026) The Prevent Duty: Practical Guidance for Designated Safeguarding Leads.
- Department for Education (2026) Channel Meetings: Practical Guidance for Designated Safeguarding Leads.
- Department for Education (2026) Safeguarding Learners Susceptible to Radicalisation: Next-Step Checklists.
- Home Office (2026) *Notice, Check, Share Guidance*
- Keeping Children Safe in Education (KCSIE).
- Working Together to Safeguard Children.
- Apprenticeships, Skills, Children and Learning Act 2009.
- Equality Act 2010.
- Data Protection Act 2018 and UK GDPR.
- DHA Safeguarding Policy, E-Safety Policy, Equality and Diversity Policy and Whistleblowing Policy.

Prevent is one of the four strands of the UK Government's counter terrorism strategy, CONTEST, which aims to reduce the threat of terrorism through proactive and preventative measures.

The Prevent strategy specifically aims to:

- Tackle the ideological causes of terrorism.
- Intervene early to support individuals susceptible to radicalisation.
- Support the disengagement and rehabilitation of those already involved in terrorism.
- Work across sectors where risks of radicalisation exist, including education and training, health, social care and law enforcement.

DHA is fully committed to upholding the principles and statutory responsibilities of the Prevent Duty and safeguarding apprentices from all forms of extremism, radicalisation and terrorism.

This policy applies to:

- All DHA staff, trainers, managers and stakeholders.
- All apprentices enrolled with DHA.
- All subcontractors and third parties working on behalf of DHA.

Definitions

Radicalisation: The process by which a person comes to support terrorism or forms of extremism that may lead to terrorism.

Extremism (as defined in the Prevent Strategy):

"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 also includes calls for the death of members of the armed forces."

British Values
The government defines these as:

- Democracy
- The rule of law
- Individual liberty
- Mutual respect and tolerance of people with different faiths, beliefs, cultures and backgrounds, including those with no religious belief.

Prevent as Safeguarding

DHA recognises that Prevent is a safeguarding responsibility and should not operate separately from wider safeguarding systems and processes.

Concerns relating to radicalisation may sit alongside other safeguarding risks including:

- Child criminal or sexual exploitation.
- Online harm.
- Mental health and wellbeing concerns.
- Social isolation.
- Family difficulties.
- Peer influence.
- Hate incidents or discrimination.
- Other vulnerabilities that may increase susceptibility to harmful influences.

Staff must apply the same safeguarding principles to Prevent concerns as they would to any other safeguarding matter, including:

- Professional curiosity.
- Proportionate decision-making.
- Information sharing.
- Accurate record keeping.
- Contextual safeguarding.
- Appropriate escalation where concerns remain.

DHA recognises that the presence of a single behaviour, statement or concern does not automatically indicate radicalisation or extremism. Concerns must be considered within the wider safeguarding context of the learner's circumstances, experiences and support needs.

DHA's Prevent Policy is designed to:

- Promote and reinforce a shared set of British values.
- Create safe, respectful environments for learning and debate.
- Ensure apprentices are protected from all forms of radicalisation, bullying, harassment and discrimination.
- Enable staff to identify and respond to signs of radicalisation early and appropriately.
- Outline clear processes for reporting concerns and making referrals.

The UK has five official threat levels indicating the likelihood of a terrorist attack:

- **LOW** – an attack is highly unlikely
- **MODERATE** – an attack is possible, but not likely
- **SUBSTANTIAL** – an attack is likely
- **SEVERE** – an attack is highly likely
- **CRITICAL** – an attack is highly likely in the near future

The **current threat level** can be found at:
☞ Terrorism threat levels - Threat Levels | MI5 - The Security Service

Designated Safeguarding Lead (DSL)

- Holds strategic responsibility for Prevent across DHA.
- Coordinates Prevent activities and ensures compliance with legislation.
- Oversees referrals and liaises with Channel, local authorities and other external bodies.
- Supported by the Deputy Safeguarding Lead and Managing Director.

All Staff and Trainers

- Must complete mandatory Prevent and safeguarding training annually.
- Must familiarise themselves with this policy and adhere to procedures.
- Are responsible for promoting British values and encouraging respectful, inclusive dialogue.
- Must report any Prevent related concerns immediately to the DSL.

Apprentices' Responsibilities

Prevent should not sit solely with staff.

All Apprentices are expected to:

- Treat others with dignity and respect.
- Demonstrate British Values and positive behaviour.
- Report any concerns relating to extremism, radicalisation, bullying, discrimination, hate crime, or online harms.
- Use DHA systems and online resources responsibly.

Prevent Policy last review September 2026 – Kate Day

- Engage positively with Prevent, safeguarding and wellbeing activities.

Employer Responsibilities

Employers supporting DHA apprentices are expected to:

- Promote safe and inclusive working environments.
- Notify DHA of any safeguarding or Prevent concerns relating to apprentices.
- Support apprentices to participate in Prevent and safeguarding awareness activities.
- Work collaboratively with DHA and relevant agencies where concerns arise.

Risk Assessment and Monitoring

- DHA conducts a regular Prevent Risk Assessment reviewed quarterly by the DSL and Managing Director.
- This includes updates to Prevent action plans and monitoring of implementation.
- Web filtering and monitoring systems are in place to restrict access to extremist content on DHA devices and networks.
- Breaches of the IT Acceptable Use Policy will trigger disciplinary action.

Curriculum and Learner Engagement

- Equality, Diversity, and Inclusion principles, including respect and tolerance are embedded in all teaching and learning activities.
- DHA embeds Prevent, British Values, Equality, Diversity and Inclusion, online safety and current affairs through curriculum activities, learner reviews, tutorials and ‘Hot Topics' discussions. These activities promote critical thinking, media literacy, resilience to extremist narratives and informed decision making.
- Trainers are encouraged to create safe spaces for learners to explore and debate sensitive issues constructively and respectfully.

Online Safety

DHA recognises that online radicalisation presents a significant safeguarding risk. Staff and learners receive guidance on identifying misinformation, disinformation, harmful online influences and extremist content including content shared through social media platforms.

- DHA employs robust IT filters and monitoring to prevent access to extremist material.
- Online safety is taught as part of the learner journey, with clear expectations around safe and responsible use of the internet.
- Any attempt to access extremist or inappropriate content will be investigated, with appropriate follow-up action taken.

Recognising and Assessing Concerns

DHA recognises there is no single indicator of radicalisation and that vulnerability to radicalisation can present differently for each individual.

Potential indicators may include:

- Expressing extremist views or support for extremist causes.
- Sudden changes in behaviour, appearance or friendship groups.
- Increasing isolation from family, peers or colleagues.
- Accessing, creating or sharing extremist content online.
- Demonstrating intolerance towards different cultures, beliefs or lifestyles.
- Justifying violence to resolve political, religious or social issues.
- Changes in language, attitudes or behaviour that cause concern.

These indicators do not automatically mean an individual is being radicalised. Staff must avoid making assumptions based on a single incident, statement or behaviour.

When concerns arise, practitioners should consider:

- What specifically has been observed.
- Whether this represents an isolated incident or developing pattern.
- Changes in the learner's presentation, behaviour or circumstances.
- Other safeguarding, wellbeing or support needs.
- Family, peer and environmental influences.
- Online activity and online influences.
- Existing protective factors and support networks.

Professional curiosity should be applied to understand the wider context before any decision is made regarding a referral.

Speaking Up / Whistleblowing

DHA encourages staff, apprentices, employers and stakeholders to raise concerns where they believe extremist behaviour, radicalisation risks or failures in safeguarding practice may exist.

Concerns may be raised through DHA's Whistleblowing Policy and will be managed confidentially and appropriately.

SEND and Neurodivergent Learners

DHA recognises that apprentices with special educational needs, disabilities or neurodivergent conditions may present behaviours, communication styles or social interactions that require additional consideration when assessing safeguarding concerns.

When considering Prevent concerns involving learners with SEND or neurodivergence, staff should consider:

- Communication and processing differences.
- Existing Education, Health and Care Plans (where applicable).
- Support plans and additional learning needs.
- Whether behaviours are longstanding or newly emerging.

- Social isolation or vulnerability to influence.
- Relationships with peers, family and colleagues.
- Online activity and online influences.

Staff must not assume that SEND or neurodivergence alone explains a safeguarding concern, nor should it automatically be viewed as increasing susceptibility to radicalisation.

Any concerns must be considered within the learner's full safeguarding context and assessed proportionately and fairly.

Responding to Prevent Concerns

When a concern is identified, DHA staff should follow the principles contained within the Department for Education's safeguarding guidance and the Home Office Notice, Check, Share framework.

1. Notice

Staff should clearly identify:

- The behaviour, incident or information that has caused concern.
- Whether the concern appears isolated or forms part of a wider pattern.
- Any immediate safeguarding risk.

2. Check

Where appropriate and safe to do so, staff should:

- Speak with the learner.
- Consult with the Designated Safeguarding Lead.
- Review attendance, progress, behaviour and wellbeing information.
- Gather relevant information from colleagues and employers.

The purpose of checking is not to investigate or prove radicalisation. It is to obtain sufficient information to make an informed safeguarding decision.

3. Consider Context

Practitioners should consider:

- The learner's circumstances and experiences.
- Protective factors.
- Family relationships.
- Peer influences.
- Online influences.
- Environmental factors.
- Existing safeguarding concerns.

- Mental health or wellbeing needs.

4. Seek Advice and Record

Staff must:

- Discuss concerns promptly with the Designated Safeguarding Lead.
- Record all observations, actions taken, discussions held and advice received.
- Clearly document the rationale for decisions made.
- Seek additional advice from Prevent professionals or external agencies where appropriate.

5. Decide

The Designated Safeguarding Lead will consider:

- The full safeguarding picture.
- Whether sufficient information has been gathered.
- Whether further support is required.
- Whether a Prevent referral or Channel referral is proportionate and necessary.

All decisions must be evidence-informed, proportionate and focused on the learner's welfare and safety.

Reporting Concerns

Any concern about an apprentice or staff member who may be vulnerable to radicalisation must be reported immediately to the DSL.

Safeguarding Team

- **Kate Day – Director of Operations (DSL)**
  07580 864473 | kate.day@dhassociates.co.uk
- **Claire Oakes – Deputy DSL**
  07825 637622 | claire.oakes@dhassociates.co.uk
- **Kirstie Battams – Deputy DSL**
  07776528093 | kirstie.battams@dhassociates.co.uk

The Channel Programme

Prior to any referral to Channel, DHA will normally undertake appropriate safeguarding checks and information gathering through the Notice, Check, Context, Seek Advice and Decide process unless immediate risk dictates otherwise. The DSL may be required to participate in Channel discussions, provide relevant information and contribute to multi-agency safeguarding planning where a learner is accepted into the Channel process.

Channel is a voluntary, confidential, multi-agency safeguarding programme that provides support to individuals who may be vulnerable to being drawn into terrorism.

The programme aims to:

- Identify individuals at risk.
- Assess the nature and extent of that risk.
- Develop an appropriate support plan.
- Reduce vulnerability and build resilience.

Participation in Channel is voluntary and operates within existing safeguarding frameworks.

Referrals to Channel or External Agencies

- The DSL will determine whether to refer a concern to Channel, the multi-agency panel that provides support for individuals at risk of being drawn into terrorism.
- The DSL may also consult with the Managing Director or hold a special safeguarding meeting prior to referral.
- Once referred, the Channel coordinator and local authority will assess the case.

Training and Development

Training will include:

- Understanding the Prevent Duty.
- The DfE Prevent Practical Guidance (2026).
- Notice, Check, Share principles.
- Contextual safeguarding approaches.
- Professional curiosity and decision-making.
- Recording and information sharing requirements.
- SEND and neurodiversity considerations within Prevent

External Collaboration

- DHA maintains strong links with:
    - Local authorities
    - Regional CONTEST Coordinator
    - Police and safeguarding partners
    - Learner Provider Networks
- Information will be shared responsibly and securely in line with safeguarding protocols and data protection legislation.

Contacts for Further Guidance

Prevent Duty Guidance:
Prevent duty guidance: GOV.UK

Regional CONTEST Coordinator – North West:
Email: Prevent.NorthWest@service.education.gov.uk

Contact form: Contact Form: https://www.gov.uk/guidance/regional-contest-co-ordinators

Policy Review

This policy will be reviewed annually or sooner where:

- Legislation changes.
- Government guidance is updated.
- Following a Prevent incident or referral.
- Risk assessments identify emerging threats.

The Designated Safeguarding Lead is responsible for ensuring the policy remains current and effective.