



**CATS**  
GLOBAL SCHOOLS

# Prevent Duty Policy

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Going further than others

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# 1. Background and legal context

CATS Globals Schools (CGS) acknowledges and accepts its legal duty to have due regard to the risk of people being drawn into terrorism. The Prevent Duty, which came into force in September 2015 as part of the Counter-Terrorism and Security Act 2015, places legal requirements on education providers to minimise the risk of individuals being drawn into terrorism and to ensure vulnerable individuals receive timely and appropriate support. CGS must demonstrate that it has processes and policies in place to comply with the Prevent Duty in a proportionate way.

CGS must balance the requirements of Prevent with its central belief that the cultural, religious and ethnic diversity of its staff and students should be celebrated. It must also meet its legal and moral obligation to allow and promote academic freedom and free speech, which are vital aspects of successful academic communities.

All Office for Students (OfS) registered providers (Higher Education institutions) should report Prevent-related serious incidents and Prevent-related change of circumstances as reportable events as required by ongoing condition F3 (provision of information to the OfS). These must be submitted online via the OfS portal as for all reportable events.

Each institution of CGS in the UK is monitored by a relevant Educational Oversight Body, details of these can be found in Appendix 1.

## 2. Who does this policy apply to?

The Prevent Policy applies to everyone working at or attending a CGS School or College. It confers responsibilities on all governors, staff, students, agency staff and volunteers, contractors, visitors, consultants and those working under self-employed arrangements.

## 3. Compliance with Prevent Duties

All CGS institutions promote British Values, including democracy, the rule of law, individual and mutual respect and tolerance of different faiths and beliefs in whatever way is most appropriate for the ages and academic level of its students.

The Prevent Duty sits within the realm of Safeguarding at CGS institutions and this policy is integral to the Safeguarding Policies and should be applied as an extension to the School's/College's current and established safeguarding procedures.

All staff are trained and regularly updated on the Safeguarding Policy and associated professional practices and expectations.

The general risks affecting children and young adults may vary from area to area, and according to their age. CGS institutions are expected to implement processes and identify risks within their specific context.

## 4. Staff recruitment

As part of CGS' approach to Safer Recruitment, pre-employment DBS and Right to Work checks are conducted for all staff in roles working with students, or who will have access personal student data. This includes staff who will work remotely with students. Candidates' referees are given an opportunity to comment on the person's suitability for working with children and young adults.

## 5. Staff induction and training

- All members of staff are required to read and understand the specific Safeguarding Policy and Prevent Duty Guidance appropriate to their role within the organisation.
- Each CGS institution must ensure that staff have training that gives them the knowledge and confidence to identify students at risk of being drawn into terrorism, and to challenge extremist ideas which can be used to legitimise terrorism and are shared by terrorist groups.
- All staff are made aware of procedures both internally and externally for sharing information about vulnerable individuals (where appropriate to do so).
- Each CGS School/College (excluding Stafford House Summer who share the responsibility across the centres) has a Designated Safeguarding Officer/Lead and a deputy, both of whom are appropriately trained in Safeguarding and the Prevent Duty.
- Staff engaged in student welfare are required to undertake further training on matters of Prevent, safeguarding, counselling and student support.
- Key staff will be able to provide training, advice and support to other members of staff on protecting children from the risk of radicalisation.

## 6. Risk assessment and action plans

The statutory guidance makes clear that institutions are expected to assess the risk of students being drawn into terrorism, including support for extremist ideas that are part of terrorist ideology. This means being able to demonstrate both a general understanding of the risks affecting children and students/vulnerable adults in the area and a specific understanding of how to identify individuals who may be at risk of radicalisation and what to do to support them.

CGS institutions are expected to assess the risk of students being drawn into terrorism, including support for extremist ideas that are part of terrorist ideology. This should be based on an understanding, shared with partners, of the potential risk in the local area.

Where necessary, CGS Schools/Colleges should create an action plan in relation to the Prevent Duty, and to monitor and report on progress on an annual basis.

## 7. Safeguarding, Welfare and Pastoral care

To ensure that staff take preventative and responsive steps, CGS Schools/Colleges are expected to have strong, effective and responsive student support services.

Each CGS School/College has a published Safeguarding Policy available on the institution's website which outlines the approach.

## 8. IT policies

CGS IT Policies (for staff and students) refer to the Prevent Duty and Counter Terrorism & Security Act 2015. Filtering systems have been assessed as robust with regard to traffic related to extremism and terrorism. Policies and processes are reviewed regularly to ensure that CGS are continuously developing effective ICT security.

## 9. External speakers and visitors

- All CGS institutions are required to have clear protocols for ensuring that any visiting speakers whether invited by staff or students, are suitable and appropriately supervised
- External speakers and consultants are required to be made familiar with their division of CGS' Prevent Duty obligations and any Visitor and/or Freedom of Speech Policy. Where appropriate, this may also require visitors to sign an External Speaker Policy and Form, available from the Prevent Lead or Head/Principal.
- Staff organisers of a visiting speaker or event must follow any relevant policies applicable to their institution and ensure visitors are appropriately supervised.
- Contractors or visitors to any CGS School/College are to be made aware of the Prevent Duty as part of their safeguarding introduction.

## 10. Partnerships with other local organisations

Local authorities are vital to all aspects of Prevent work. In some priority local authority areas, Home Office fund dedicated Prevent co-ordinators to work with communities and organisations, including education providers. Other partners, in particular the police and also civil society organisations, may be able to provide advice and support to institutions on

implementing the duty.

All CGS institutions are aware of how make contact with their local Safeguarding Board, and local Prevent Police representative, should it be necessary.

## 11. Expectations of staff

Any member of CGS staff may be in regular contact with students and/or work colleagues and may get to know them well. They may witness activity and behaviour or receive information which others are not privy to. They should use professional judgement to decide when concerns should be referred to the safeguarding team. All staff members should be familiar with the Safeguarding policies and Prevent Duty guidance relevant to their role.

**If a person is in imminent risk of harm, call 999.**

If your professional experience gives you concerns about the behaviour of an individual student or colleague, contact your Designated Safeguarding Officer/Lead.

Identification of concerns might include:

- Expression of views which are discriminatory against protected groups or individuals
- Third party reports of concerns about behaviour e.g. plans to travel abroad to high risk countries or extremist activities
- Evidence of discriminatory treatment of other groups or individuals
- Evidence of bullying behaviour or harassment
- Evidence of non-compliance with the providers expectations of behaviour
- Possessing, accessing extremist materials.
- Evidence of family concern about vulnerability to extremism
- Expression of extremist views, including on private social media accounts.
- Use of extremist language
- Threats of violence

## 12. Extremism and Terrorism

This section provides ways in which a person can be vulnerable to radicalisation and the indicators that might suggest vulnerabilities. However, it should not be assumed that the characteristics or experiences set out below necessarily indicate a person is either committed to terrorism or may become a terrorist.

- Engagement with a group, cause or ideology
- Changing style of dress or appearance in accordance with ideology group
- Day to day behaviour/thoughts/ideas become centred around ideology group or cause
- Loss of interest in friends/activities not associated with ideology group or cause
- Possession of material or symbols associated with an extremist cause
- Attempts to recruit others to the group/cause/ideology

- Communications with others to suggest identification with group/cause/ideology

If you are concerned about a person's behaviour (staff or student) then please in the first instance report your concerns to the Designated Safeguarding Officer/Lead (DSO/L). The DSO/L will liaise with the Senior Management Team and if necessary liaise directly with the local Police Prevent Officer and Police Channel coordinator.

## 13. The role of Executive Team and Governing Body

The CGS Executive Team and Governing Bodies of CGS institutions will undertake appropriate training to ensure that they are clear about their role and the parameters of their responsibilities as Governors, including their statutory safeguarding duties. In line with the provisions set out in the DfE guidance 'Keeping Children Safe in Education' the Governing Body will challenge CGS institutions on the delivery of this policy and relevant policies within each institution and monitor effectiveness.

OfS require an annual signed accountability declaration from the provider's governing body (or proprietor where there is no governing body) confirming this it has had due regard to the need to prevent people being drawn into terrorism and has provided all the required information.

## 14. Further information and training

The United Kingdom's strategy for countering terrorism:

[www.gov.uk/government/publications/counter-extremism-strategy](http://www.gov.uk/government/publications/counter-extremism-strategy)

[www.gov.uk/government/publications/prevent-duty-guidance](http://www.gov.uk/government/publications/prevent-duty-guidance)

### Training

Government advice for schools: <https://www.educateagainsthate.com>

Home Office: <https://www.elearning.prevent.homeoffice.gov.uk/screen2>

Leadership Foundation approved training for HE: <http://www.safecampuscommunities.ac.uk/>

FE training: <http://www.preventforfeandtraining.org.uk/>

This guidance should be read in conjunction with other relevant guidance. In England, this includes Working Together to Safeguard Children, Keeping Children Safe in Education and Information Sharing: Her Majesty's Government advice for professionals providing safeguarding services to children, young people, parents and carers.

[Working together to safeguard children](#)

[Keeping children safe in education](#)

In Wales it should be read alongside [Keeping learners safe](#).

## Appendix 1: Summary of CGS institution oversight

As with other education providers, the Prevent Duty falls under CGS' Safeguarding Policies as a matter of student welfare, along with IT Policies and systems for assessing and mitigating risks around external speakers and events. With different Educational Oversight Bodies and based in different locations, each of CGS institutions requires a slightly different approach, related to the ages and academic level of its students.

### CATS Canterbury, CATS London, Bosworth College and Bournemouth Collegiate School

- Prevent Duty overseen by ISI on behalf of DfE
- Does not currently have to submit any Prevent-specific returns
- Established systems and checks in place via Designated Safeguarding Lead (DSL)
- Safeguarding and other policies available on website and internal systems
- DfE Essential reading: <https://www.gov.uk/government/publications/protecting-children-from-radicalisation-the-prevent-duty>

### CATS Cambridge and CSVPA

- Trading names of Cambridge Arts & Sciences Ltd, partly overseen by ISI (RQF Level 2 and 3) and partly Office for Students (OfS) (RQF level 4+)
- CATS and CSVPA have established systems and checks in place via Designated Safeguarding Lead (DSL)
- CSVPA is classed as a Higher Education Institution (HEI) and registered with OfS, who are responsible for monitoring the implementation of the Prevent duty for HE students
- Safeguarding and other policies available on website and internal systems
- Required to report Prevent-related serious incidents and Prevent-related change of circumstances to OfS as Reportable Events
- Annual signed accountability declaration required for OfS
- DfE Essential reading: <https://www.gov.uk/government/publications/protecting-children-from-radicalisation-the-prevent-duty>
- OfS Essential reading: <https://www.officeforstudents.org.uk/advice-and-guidance/student-wellbeing-and-protection/counter-terrorism-the-prevent-duty>

### St Michael's School

- Prevent Duty overseen by Estyn on behalf of the Welsh Government (under Annex 5: Preventing radicalisation and extremism)
- Does not currently have to submit any Prevent-specific returns
- Established systems and checks in place via Designated Safeguarding Lead
- Safeguarding and other policies available on website and internal systems

- Estyn Prevent report, including recommendations:  
<https://www.estyn.gov.wales/thematic-report/prevent-how-well-maintained-schools-implement-their-duties-under-counter-terrorism>

### Stafford House

- Prevent Duty overseen by the British Council
- Does not currently have to submit any Prevent-specific returns.
- Stafford House and Stafford House Summer have established systems in place via the DSL.



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