Prevent and Radicalisation Policy

1. Policy statement

Learn to Shine Education Ltd is committed to safeguarding and promoting the welfare of every child and young person attending its Alternative Provision and Tuition Centre. We recognise that children may be vulnerable to radicalisation, extremist exploitation, coercion, grooming and involvement in terrorism.

We will use a proportionate, child-centred safeguarding approach to identify concerns early, protect learners from harm, challenge extremist narratives appropriately and work with families and relevant agencies to secure support.

We will not tolerate the promotion of terrorism, encouragement of terrorist activity, or the use of our premises, technology, resources or educational activities to facilitate radicalisation.

We will protect freedom of expression, lawful religious belief, political discussion and respectful debate. A learner must not be regarded as a Prevent concern solely because of their religion, ethnicity, nationality, political opinion, disability, neurodivergence or lawful expression of unpopular views. Decisions will be based on relevant information, behaviour, context and safeguarding risk.

This policy applies to all employees, directors, agency workers, volunteers, contractors, visitors and other adults working with or on behalf of Learn to Shine Education Ltd.

2. Legal framework and statutory guidance

This policy should be read alongside the current versions of the following:

- Counter-Terrorism and Security Act 2015, section 26 — establishes the Prevent duty for specified authorities.
- Prevent duty guidance: England and Wales — statutory guidance issued under section 29 of the 2015 Act.
- Keeping Children Safe in Education 2026 — current statutory safeguarding guidance for schools and colleges.
- Education Act 2002, section 175 — safeguarding and welfare duties for relevant education bodies.
- Children Act 1989 — child welfare and protection framework.
- Children Act 2004 — duties concerning safeguarding and promoting children's welfare.
- Equality Act 2010 — protection against unlawful discrimination.

- Online Safety Act 2023 — relevant online safety framework.
- Alternative Provision statutory guidance — expectations concerning the suitability and safeguarding of AP placements.
- Working Together to Safeguard Children — multi-agency safeguarding arrangements.

Learn to Shine Education Ltd will check for amendments and updated guidance during each policy review. Where a duty applies directly to a commissioning school or another specified authority rather than directly to this provider, Learn to Shine Education Ltd will co-operate with that authority and meet the applicable contractual, safeguarding and placement requirements.

3. What is Prevent?

Prevent is part of the UK's CONTEST counter-terrorism strategy. Its purpose is to stop people from becoming terrorists or supporting terrorism.

Radicalisation is the process by which a person comes to support terrorism or extremist ideologies associated with terrorism. It can take place online, in person or through a combination of influences.

Learners in Alternative Provision may experience additional vulnerabilities, including social isolation, exclusion, exploitation, unmet special educational needs, adverse childhood experiences, bullying, mental health difficulties, involvement with criminal networks or a desire to belong. These circumstances do not mean that a learner is becoming radicalised; they mean staff should be alert to the learner's individual safeguarding needs.

Prevent concerns must be considered alongside other possible explanations and safeguarding risks. Staff must not diagnose radicalisation or conduct their own investigations.

4. Roles and responsibilities

Directors/proprietor

The directors or proprietor will:

- Ensure this policy is implemented, reviewed and communicated.
- Ensure that appropriate safeguarding leadership, staff training and reporting arrangements are in place.

- Ensure staff understand the provider's safeguarding responsibilities and the arrangements agreed with commissioning schools.
- Review significant incidents, referrals and learning arising from safeguarding concerns.
- Ensure proportionate oversight of online safety, filtering and monitoring where relevant to the provision.

Designated Safeguarding Lead(s) (DSL)

The DSL will:

- Receive, assess, record and respond to Prevent-related safeguarding concerns.
- Maintain appropriate safeguarding records and ensure information is shared lawfully.
- Seek advice from children's social care, the local authority Prevent team, police or other relevant professionals where appropriate.
- Make referrals through the appropriate local Prevent pathway when indicated.
- Liaise with commissioning schools, parents/carers and other agencies as appropriate and safe.
- Ensure staff receive suitable Prevent and safeguarding training and understand local referral procedures.
- Continue safeguarding oversight after a referral.

All staff

Every member of staff must:

- Remain vigilant to possible signs of radicalisation, grooming, coercion and exploitation.
- Recognise that one sign alone does not establish radicalisation.
- Report concerns promptly to the DSL or deputy DSL.
- Make a factual, dated record of concerns and the actions taken.
- Maintain professional curiosity and avoid discriminatory assumptions.
- Never promise secrecy or undertake an independent investigation.
- Escalate urgent risks immediately to the police or emergency services where necessary.

5. Recognising possible indicators

Potential indicators requiring consideration in context may include:

- A sudden or sustained change in behaviour, relationships, identity or expressed beliefs.
- Increasing isolation from previously supportive relationships or activities.

- Repeated use or promotion of material that glorifies terrorism, encourages terrorist violence or dehumanises targeted groups.
- Attempts by others to control a learner's communications, movements, beliefs or relationships.
- Contact with individuals who appear to be grooming, coercing or exploiting the learner.
- Statements suggesting an intention to commit, facilitate or support terrorist violence.
- Plans to travel to join a terrorist organisation or provide material support for terrorism.
- Significant online activity involving terrorist propaganda, recruitment or instructions connected with terrorism.

Staff must consider context, the learner's age, communication needs, SEND, mental health, experiences of discrimination and any relevant protective factors. Do not treat ordinary religious observance, political disagreement, curiosity, lawful protest or criticism of government policy as evidence of radicalisation.

6. Important safeguarding terminology staff must understand

Radicalisation: A process through which a person comes to support terrorism or extremist ideologies associated with terrorism.

Extremism: In the current Prevent framework, the term is used in relation to ideologies or activities that promote or facilitate terrorism, or that fall within the applicable government definition. Staff should use the current statutory guidance rather than applying the term loosely to views they personally disagree with.

Terrorism: Refer to the applicable legal definition in the Terrorism Act 2000 and related legislation. Staff should report relevant safeguarding concerns rather than attempt to determine criminal liability.

Grooming: A process in which someone builds trust, influence or control over a person to exploit or abuse them. Grooming may be sexual, criminal, financial or ideological.

Coercion: Pressuring, threatening or manipulating someone into doing something against their wishes.

Exploitation: Taking unfair or abusive advantage of a person's vulnerability for another person's benefit.

Cuckooing: When criminals or exploiters take over, manipulate or use another person's home, often a vulnerable person's property, as a base for criminal activity. This can include drug dealing, storing weapons or stolen goods, or exploiting the occupant. The occupant may be threatened, intimidated, groomed, indebted or made to feel that they have no choice. Cuckooing is commonly associated with county lines and criminal exploitation; it is not, by itself, proof of radicalisation.

County lines: Criminal activity involving organised groups or individuals who use a phone line or other means to move and supply drugs, often across local or regional boundaries. Children and vulnerable adults may be exploited to transport drugs or money, store items or facilitate criminal activity.

Child criminal exploitation (CCE): Where a child is manipulated, coerced or exploited into criminal activity. Apparent agreement or participation does not mean the child is not a victim.

Channel: A voluntary, confidential, multi-agency safeguarding programme that can provide tailored support to people assessed as vulnerable to being drawn into terrorism. It is not a criminal conviction or a substitute for emergency safeguarding action.

Prevent referral: A referral to the appropriate local Prevent pathway when there is a concern that an individual may be susceptible to being drawn into terrorism. A referral is not an accusation or finding of guilt.

Protective factors: Circumstances that may reduce vulnerability, such as positive relationships, a sense of belonging, trusted adults, meaningful education, family support and access to appropriate services.

Staff should also recognise that cuckooing, county lines, radicalisation and other forms of exploitation may overlap, but are not interchangeable terms. A concern about one form of harm must be addressed on its own evidence and safeguarding merits.

7. Reporting and responding to concerns

Staff must follow the steps below whenever they suspect that a learner may be at risk of radicalisation or related exploitation.

Step 1 — Respond safely

- Listen calmly and take the concern seriously.
- Reassure the learner that they have done the right thing by speaking up.
- Do not promise confidentiality.
- Do not confront suspected exploiters or attempt to obtain evidence.
- Ask only necessary, open questions to clarify immediate safeguarding needs.

Step 2 — Report promptly

Report the concern to the DSL on duty or deputy DSL as soon as possible, on the same day wherever practicable.

If a child is in immediate danger, a threat of imminent violence exists, or there is an urgent terrorist threat, call 999. **Do not wait for internal authorisation**.

If the DSL is implicated, unavailable and the matter cannot safely wait, report directly to the appropriate children's social care team or police, and inform the provider's senior leadership where safe and appropriate.

Step 3 — Record accurately

The record must include:

- The learner's name and relevant identifying details.
- Date, time and location of the concern.
- The facts observed or the words disclosed, using direct quotations where possible.
- The identity of any witnesses or relevant people, where known.
- The learner's presentation and any immediate safety concerns.
- Actions taken, advice received, referrals made and decisions with their rationale.
- The names and roles of people receiving the information.

Records must be factual, objective, securely stored and shared only with those who need the information for safeguarding purposes.

Step 4 — DSL assessment and referral

The DSL will consider the concern in the context of the learner's circumstances, other safeguarding information, vulnerabilities, protective factors and any existing professional involvement.

Where appropriate, the DSL will consult or refer to the local authority Prevent team, children's social care, the police or the local safeguarding partnership. The DSL may seek advice where the threshold is uncertain.

Staff do not need proof that radicalisation has occurred before reporting a concern. Do not delay an appropriate referral while trying to establish the facts independently.

Step 5 — Ongoing support

A referral does not end the provider's safeguarding responsibilities. The DSL will ensure that appropriate support, monitoring, information-sharing and placement review continue, in liaison with the commissioning school / LEA and relevant agencies.

8. Information sharing and confidentiality

Information will be shared in accordance with applicable data protection law, safeguarding guidance and the common-law duty of confidentiality.

Staff must not promise secrecy. Relevant information may be shared without consent where there is a lawful basis and sharing is necessary and proportionate to safeguard a child or prevent serious harm.

The DSL will record the reason for sharing or not sharing information and follow applicable local multi-agency procedures. Information will be kept securely and retained in accordance with the provider's records-management arrangements.

9. Online safety and educational practice

Learn to Shine Education Ltd will take proportionate steps to protect learners from harmful online content and exploitation, including:

- Applying appropriate filtering and monitoring arrangements where relevant to the provision and its IT systems.
- Ensuring staff know how to report and escalate concerning online activity.
- Teaching learners to assess information critically, recognise manipulation and report unsafe contact.
- Promoting respectful discussion, inclusion, equality and the lawful expression of differing opinions.
- Ensuring resources, visiting speakers and educational activities are risk-assessed appropriately.
- Preventing the use of provider premises, devices or systems to promote terrorism or facilitate extremist recruitment.

Staff must not use personal devices or accounts to investigate a learner's online activity outside authorised procedures.

10. Training and awareness

All staff will receive safeguarding induction and appropriate Prevent awareness training before or as soon as practicable after beginning relevant duties, with updates and refresher training as needed.

The DSL will maintain up-to-date knowledge of the current Prevent guidance, local referral pathways and available training. Staff must be able to explain how to recognise, record and report concerns.

Prevent awareness must form part of the provider's wider safeguarding culture rather than being treated as an isolated compliance exercise.

11. Alternative Provision and commissioning arrangements

Learn to Shine Education Ltd recognises the additional safeguarding risks that may arise for learners attending Alternative Provision.

For every placement, the provider will follow the agreed arrangements for:

- Safeguarding contacts and emergency escalation.
- Sharing attendance concerns, unexplained absence and changes in presentation.
- Reporting allegations, exploitation concerns and significant incidents.
- Communicating with parents/carers and commissioning schools / LEAs where appropriate.
- Reviewing risk assessments, support plans and placement suitability.
- Confirming where learners are educated and whether any subcontracted or off-site provision is used.

The commissioning school LEA retains its own safeguarding responsibilities for a pupil it places in Alternative Provision. The provider will co-operate with the commissioner and relevant agencies and will not assume that a referral transfers responsibility for the learner's safety.

12. Monitoring, review and policy compliance

The DSL will maintain a record of Prevent concerns, decisions, referrals, outcomes and learning, with access restricted appropriately.

The proprietor or director will review the effectiveness of this policy at least annually and sooner following changes in statutory guidance, local risks or a significant incident.

Failure by staff to follow this policy may result in disciplinary action and, where appropriate, referral to the relevant professional or safeguarding authority.

13. Key Contacts

Role	Name / Organisation	Contact Details
Director / DSL	Katie McDonough	07312276588
DSL	Gabrielle Nicholson	07817520183
DSL	Shannon Crooks	07930527109
Derbyshire Starting Point	Derbyshire County	01629 533190
Derbyshire LADO	Local Authority	01629 533190
Designated Officer		
Police (non-emergency)	Derbyshire	101
Emergency Services		999
Prevent Team	Derbyshire	03001228694 / 08000113764
Advice and concerns: ctp-em-prevent@derbyshire.pnn.police.uk / prevent@derbyshire.gov.uk		
Constabulary		
NSPCC Helpline	National Helpline	0808 800 5000
CEOP	Online Reporting	www.ceop.police.uk
Anti-Terrorist Hotline		0800 789 321

ACT Early: https://actearly.uk — advice and information on recognising and reporting concerns about radicalisation.

Each student has an individual Safeguarding Contact in their online platform.

This policy was approved by:

Katie McDonough