



Service Delivery Policy

Anti-Radicalisation

POLICY STATEMENT

- This policy supports the PREVENT duty as part of the Counter Terrorism and Security Act (2015).
- Phoenix Learning & Care has zero tolerance of any member of our services engaged in extremist behaviour.
- Phoenix Employees are trained, and demonstrate an understanding of, what type of behaviour constitutes extremist behaviour and are vigilant.
- The policy supports and complements the 'British Values' set out in the Department for Education guidance, 'Promoting fundamental British Values as part of SMSC in schools'.
- The policy accompanies other related safeguarding documents including the e-safety and equality policies.

Document Control

Policy Code:	GRP550	Policy Owner:	Quality
Version:	2022.08v4.01	Policy Author(s):	Tom Massie – Group Quality & Service Delivery Director Wanda Green – Lead Quality Manager
Date ratified:	02/08/2022		
Review Frequency:	1 year	Ratifying Committee:	PRG
Next review date:	August 2023	Responsible Director:	Tom Massie – Group Quality & Service Delivery Director

Document History

Date of Issue	Version No.	Next Review Date	Date Approved	Person Responsible for Change	Nature of Change
14/3/2019	2019.012v2.01	January 2020	13/3/2019	Tom Massie	New revision.
01/10/2020	2019.03_v3.01	Dec 2021	1/10/2020	Wanda Green	Reviewed
10/08/2022	2022.08v4.01	August 2023	02/08/2022	Wanda Green	Updated and reviewed

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See separate document Appendix 5 for Risk Assessment Document

1. Key Information

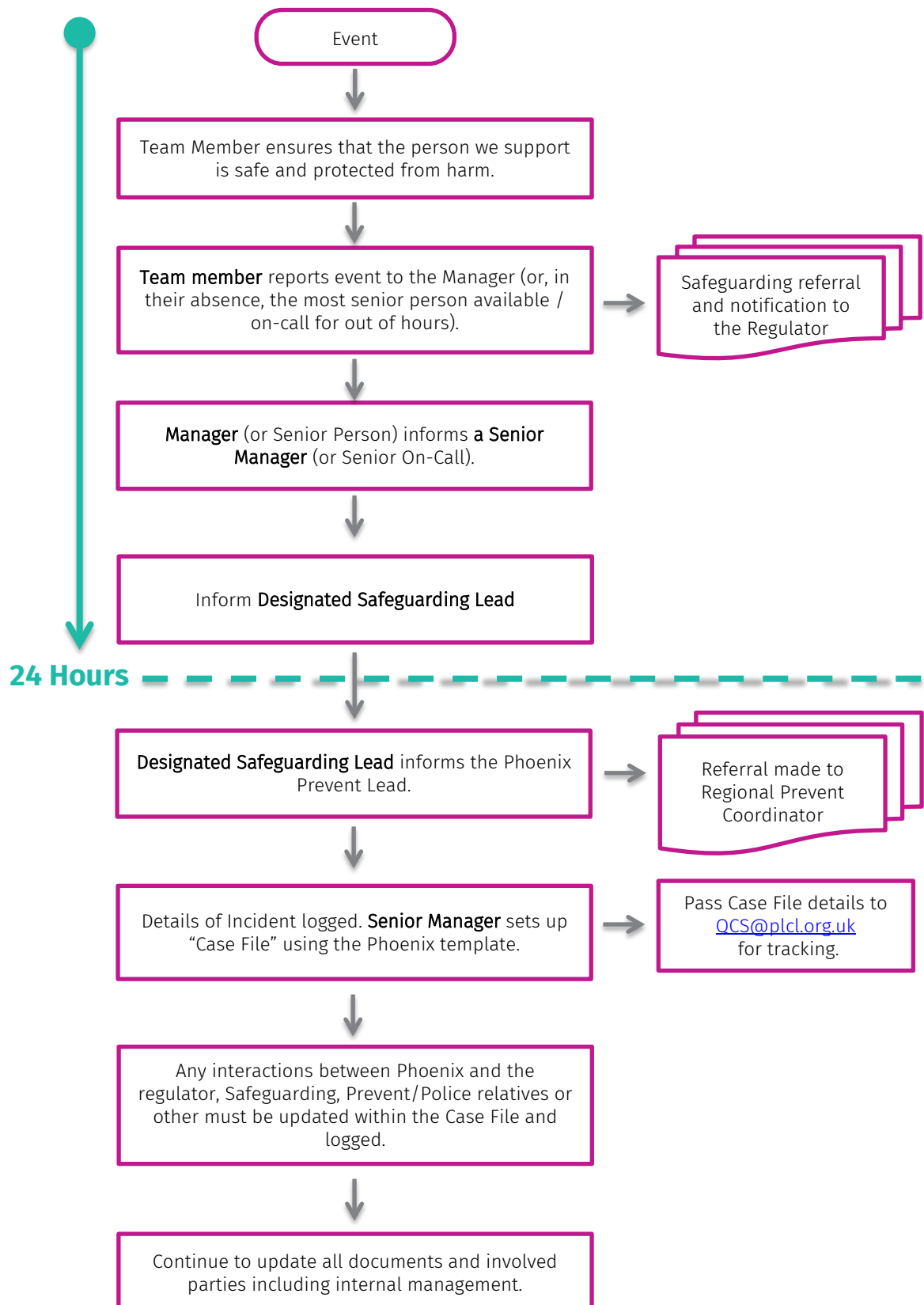
1.1 Contacts

- 1.1.1 Concerns about a person we support can vary greatly in terms of nature and seriousness, how they are identified and over what duration they have arisen. If you have concerns, you must ask for help. You should discuss your concerns with your line manager, a named or designated professional or a designated member of staff.
- 1.1.2 Designated key personnel are listed below:

Phoenix Prevent Lead (Single Point of Contact)	Abbie Heard	T: 0330 135 8 135 M: 07741903286
National Police Prevent Advice		T: 0800 011 3764
Regional Further and Higher-Level Education Prevent Coordinator	Cheri Fayers	T: 07392 135 873
Local Children Safeguarding Board: (LSCB)	Devon Somerset Cornwall Torbay Wales Caerphilly Merthyr Tydfil Rhondda Cynon Taf Child's Local Authority	0345 1551071 0300 123 2224 0300 1234 101 01803 208100 0808 1001727 01443 864616 01443 743730 01443 743730 Details available in setting
LADO: (Local Authority Designated Officer)	Devon Somerset Cornwall Torbay Wales	01392 384964 0300 123 2224 01872 326536 01803 208564 Not applicable
Local Police/Authority:	Devon & Cornwall Avon & Somerset Gwent South Wales	https://www.devon-cornwall.police.uk/ https://www.avonandsomerset.police.uk/ https://www.gwent.police.uk/en/contact-us/do-it-online/ https://www.south-wales.police.uk/
NSPCC: Childline:	National	0808 800 5000 0800 1111
Emergency Duty Team: (EDT)	Devon Somerset Cornwall Wales Caerphilly Merthyr Tydfil Rhondda Cynon Taf Child's Local Authority	0345 600 0388 or 0845 600 0388 0300 123 23 27 01208 251300 0800 3284432 0800 3284432 01443 743665/01443 657225 01443 743665/01443 657225 Details available in setting
Crimestoppers	National	0800 555 111
Confidential anti-terrorism hotline	National	0800 789 321
Counter Extremism	National	020 7340 7264 counter.extremism@education.gsi.gov.uk

1.2 Process Map

1.2.1 This is intended to provide an overview and does not replace reading the details in this policy.



2. Introduction

- 2.1.1 This policy describes the way in which Phoenix Learning and Care will meet the requirements of Prevent. Prevent is one of four work strands which make up the government 's counter-terrorism strategy – CONTEST. The aim of CONTEST is to reduce the risk to the UK and its interests overseas from terrorism.
- 2.1.2 Prevent is a strand of the counter-terrorism CONTEST strategy.
- 2.1.3 The policy will be adhered to by all employees and those we support as well as any volunteers working across the organisation.
- 2.1.4 Reference: Prevent Duty June 2015 Schools and Childcare Providers.

2.2 Policy Review References & Key Sources

- 2.2.1 In writing this policy the following regulations and guidance have been considered:
- 2017 Children and Social Work Act
 - Revised Prevent duty guidance for England and Wales 2021
 - Counterterrorism and Border Security Act 2019.
 - Keeping Children Safe in Education, DfE.
 - Guidance for Safer Working Practice for Adults who Work with Children and Young People Revised
 - Safeguarding Children and Safer Recruitment in Education”, DCSF Guidance February 2014
 - The Prevent duty Departmental advice for schools and childcare providers, DfE, June 2015 (updated April 2021)
 - Safeguarding children who may have been trafficked, HMG, 2011
 - Protecting vulnerable people from being drawn into terrorism, DfE
 - Preventing youth violence and gang involvement Practical advice for schools and colleges, DfE
 - NSPCC Briefing on key updates to statutory guidance, June 2016
 - Preventing and tackling bullying, DfE, 2018
 - SEND Code of Practice, DfE, January 2015
 - Children missing education Statutory guidance for local authorities, DfE January 2015
 - Local Safeguarding Children Board
 - Local Child Protection Procedures
 - Threshold Matrix December 2012
 - The Equality Act 2010 and schools Departmental advice for school leaders, school staff, governing bodies and local authorities, DfE, May 2014
 - Human Rights Act 1998
 - United Convention of the Rights of the Child 1991
 - Data Protection Act 1998
 - Children Act 2004
 - Education Act 2002

- Protection of Freedom Act 2012
- Serious Crime Act 2015
- Malicious Communications Act 1988
- Communications Act 2003
- Public Order Act 1986
- Local Safeguarding Children Board Procedures (LSCB)
- Relevant government guidance on safeguarding children
- Guidance from the UK Safer Internet Centre
- Information sharing Advice for practitioners providing safeguarding services to children, young people, parents and carers, March 2015

2.2.2 Other policies to reference:

- Mental capacity, decision making & DoLS (Group Policy No. 525)
- Records, Record Keeping and Passing on Information (Group Policy No. 545)
- Governance (Group Policy No. 519)
- Lone Working (Group Policy No 509)
- Risk Taking and Risk Assessment (Group Policy No. 558)

3. Definitions

3.1 People

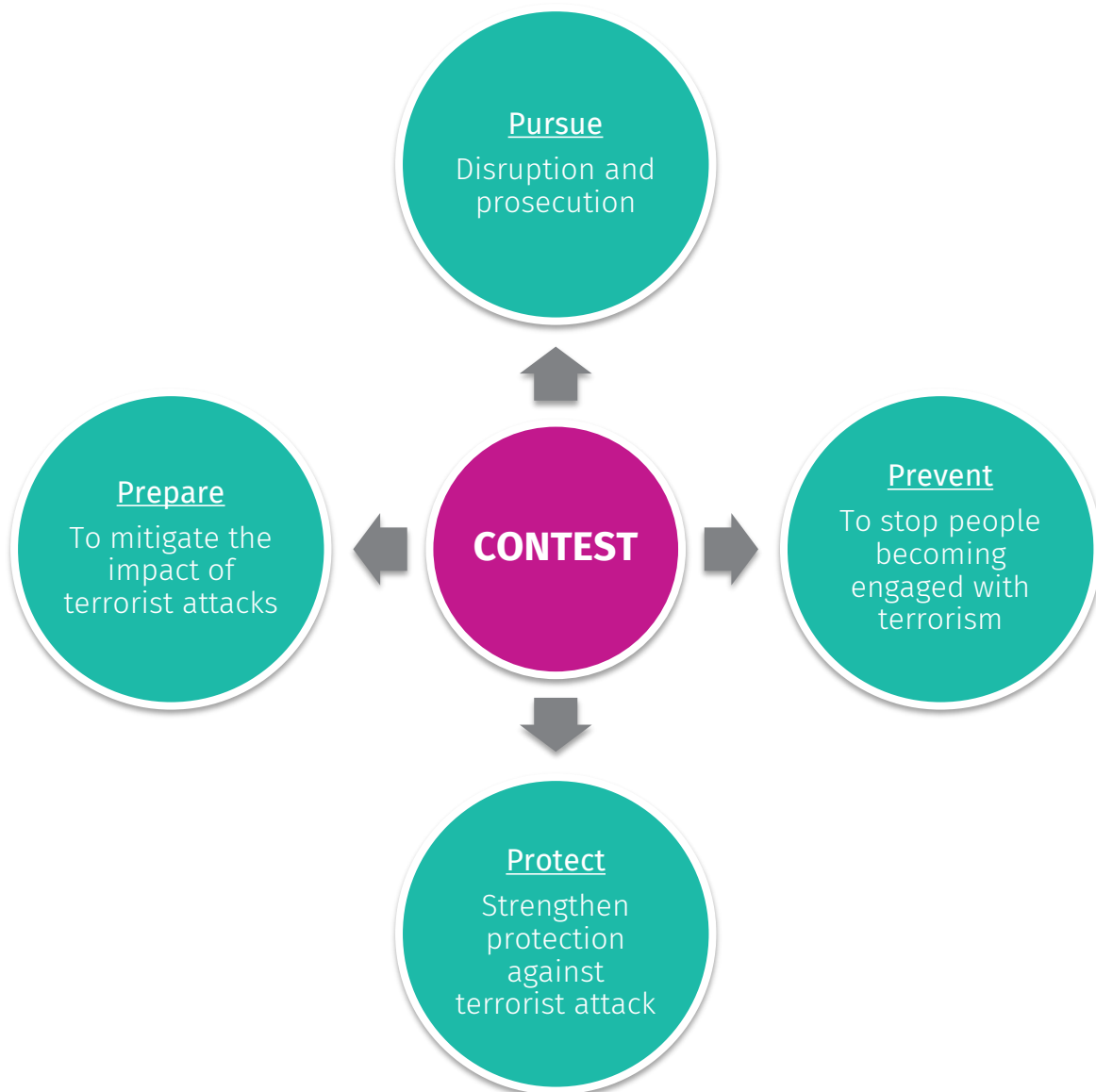
Role	Definition
People/Person we support	Child / Young Person Learner / Student
Manager	Registered Manager Head Teacher / Principal Deputy Head / Vice Principal
Senior Manager	Area Manager Regional Education Lead Residential Operations Manager Operations Director

3.2 Glossary of Terms

Item	Definition
Radicalisation	A process by which an individual/group comes to adopt increasingly extreme political, social, or religious ideals and aspirations.
Extremism	The holding of extreme political or religious views.
Propaganda	Information, especially of a biased or misleading nature, used to promote a political cause or point of view.
Terrorism	The unofficial or unauthorised use of violence and intimidation in the pursuit of political aims.
Bias	Inclination or prejudice for or against one person or group, especially in a way considered to be unfair.
Refugee	A person who has been forced to leave their country in order to find work or better living conditions.
Migrant	A person who moves from one place to another in order to find work or better living conditions.
WRAP	Workshop to Raise Awareness of Prevent.
Quality Assurance	Refers to a program for the systematic monitoring and evaluation of the various aspects of the business operations to ensure that standards of quality are being met.
Governance	Governance is a framework for continuously improving the quality of service whilst safeguarding high standards of care
Regulatory Body	An organisation appointed by the Government to establish national standards for qualifications and to ensure consistent compliance with them.
Care Manager	The lead person for a care package. In most cases is the Social Worker but could be a CPN or other MDT member.
Appendices	Supplementary information that supports the main text but is not essential to read as part of policy as will have been covered in training.

4. CONTEST

- 4.1.1 This is the government strategy to target terrorist groups in the UK and abroad. The focus is to prevent repeats of terrorist acts. There are four strands to the strategy:



5. Prevent

- 5.1.1 Prevent is one of four strands of the government's counter-terrorism strategy, CONTEST.
- 5.1.2 The purpose of Prevent is to stop people from becoming terrorists or supporting terrorism. This includes countering terrorist ideology and challenging those who promote it, supporting individuals who are especially vulnerable to becoming radicalised, and working with sectors and institutions where the risk of radicalisation is assessed to be high.
- 5.1.3 The Counter-terrorism Act 2015 places a duty on those working with vulnerable children to safeguard them from being drawn into terrorism.



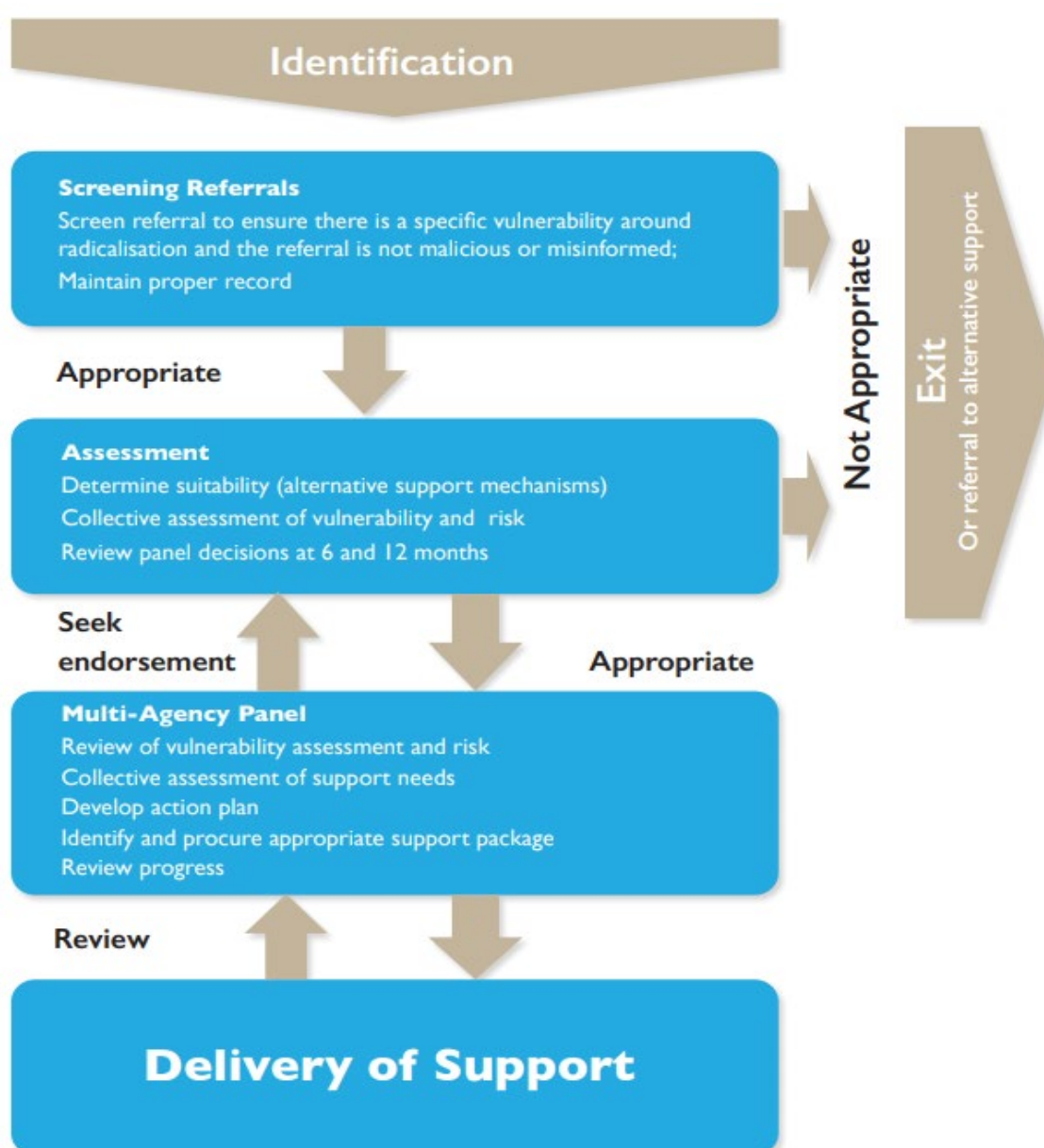
- 5.1.4 The de-radicalisation programme is known as Channel; it is led by the police and uses mentors.

5.2 Phoenix Prevent Lead

- 5.2.1 Details of the Phoenix Prevent Lead can be found in Section 1: Key Information.
- 5.2.2 The Phoenix Prevent lead must be contacted prior to any prevent referral being made and can support with any concerns people have about potential radicalisation risks.
- 5.2.3 Should a concern be made then the Phoenix Prevent Lead can seek advice from the Regional Prevent Coordinator or work with the team to make a referral.

6. Channel

- 6.1.1 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.
- 6.1.2 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.



7. Procedure

- 7.1.1 Phoenix provides care, support, and education for people with a variety of needs, and we provide a safe environment to learn and achieve. As part of these principles, safeguarding is a top priority so that people we support can develop without fear of danger or abuse. As part of our safeguarding policies and procedures, we are fully committed to supporting parents and other agencies in preventing people we support being exposed to radicalisation. We adhere to the importance of British Values and encourage children and young people to debate controversial issues. However, all team members are trained to evaluate the distinction between moderate and extremist behaviour.

7.2 Factors which may contribute to vulnerability

- 7.2.1 We recognise that people we support can be exposed to extremist influences or prejudiced views, particular those via the internet and other social media. The purpose is to protect people from harm and to ensure that they are taught in a way that is consistent with the law and our values.
- 7.2.2 Awareness of Prevent and the risks it is intended to address are both vital. Employees must identify, and to refer to the safeguarding lead people whose behaviour suggests that they are being drawn into terrorism or extremism.



7.3 Tackling extremism

7.3.1 Phoenix Learning & Care provides tolerant and safe environments for all individuals to learn and achieve. In tackling extremism, we will be vigilant in looking for signs of extremist behaviour and all team members will be aware of the procedures in place for reporting concerning behaviour.

7.3.2 Evidence of extremist behaviour may take the following form:

- Disclosure by individuals about extremist or radicalised behaviour. This could be in the form of exposure to materials.
- 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 extremist views.
- Evidence of assessing online materials (including social media sites) that include extremist materials.
- Refusal to accept views expressed by others which are counter to Phoenix's equality and diversity policy.

- Concerns raised by parents or carers about the changing behaviour of the individual.
- References to an extremist narrative in their work.

7.3.3 If team members believe there to be a risk, then they should follow the “Making a judgment” guidance in the appendices.

7.4 Risk assessment

7.4.1 Schools, Colleges, and Childcare providers are expected to assess the risk of Young People being drawn into terrorism including their potential support of extremist ideology. The risk assessment should include a general understanding of the risks affecting Young People in the local area as applicable and include a special understanding of how to identify individual Young People who may be at risk of radicalisation and what to do to support them.

7.5 Referrals

- 7.5.1 In line with our safeguarding procedures, team members are fully aware of reporting extremist behaviour.
- 7.5.2 Any disclosures or concerns of extremist behaviour should be referred to the named Designated Safeguarding Lead (DSL).
- 7.5.3 All incidents will be investigated in line with current policies and evidence will be recorded and retained for records
- 7.5.4 Social Workers / Parents / Representatives will be contacted as appropriate, and the issue will be discussed with them to investigate whether there are any mitigating

circumstances. A decision will be made at this meeting to look at any further external agency support and whether a referral should be made.

- 7.5.5 The DSL will follow up any referrals and the child or young person will be monitored for a period to look at whether there has been any change in attitude or behaviour. Social Workers / Parents / Representatives will be consulted during this period.
- 7.5.6 If concerns are still expressed, the DSL & Prevent Lead will contact the local Safeguarding Team (or Prevent Coordinator where required) to discuss the next steps.

7.6 Team Member Guidance

- 7.6.1 Team members have a duty to ensure that their interactions with the people we support preclude the promotion of partisan political views. Further information can be found in the Professional Boundaries policy.
- 7.6.2 Team members need to ensure that they take such steps as are reasonably practicable to ensure that where political issues are brought to the attention of people we support that they are offered a balanced presentation of opposing views.

7.7 ICT Services

- 7.7.1 Phoenix Learning and care purchases technical services and connectivity for our services and is committed to safeguarding the people we support and our team members when using the network.
- 7.7.2 Our ICT infrastructure has a filtering solution in place to block inappropriate content, and if a breach occurred and access to radicalisation material happened, the establishment would follow its e-safety incident management procedure to blacklist the site.

7.8 Use of External Speakers

- 7.8.1 Vetting of all external speakers would follow our safeguarding procedures and we would not allow any such speaker that undermined the principles, ethos and values endorsed by Phoenix Learning & Care.

8. Education Responsibilities

- 8.1.1 We equip Students and Learners with the knowledge, skills, and reflex to think for themselves, to challenge and to debate; and allow the opportunity to learn about different cultures and faiths and, to gain an understanding of the values we share. Exploring ideas, developing a sense of identity, and forming views are a normal part of growing up for all individuals.
- 8.1.2 We provide a safe environment for discussing controversial issues and helping Students to understand how they can influence and participate in decision-making. We actively encourage our Students to express their views but also to appreciate the impact their views can have on others, to take responsibility for their actions and to understand that the use of violence to further any cause is criminal.
- 8.1.3 We give Students the opportunity to learn about different cultures and faiths and to debate shared values, to enable them to become involved in decision-making about important and real issues.

8.2 Aims and Objectives

- 8.2.1 Our Education Establishments will:
- raise awareness
 - provide information
 - enable Students to make a positive contribution
 - Safeguard People we support.
- 8.2.2 Values and leadership strategies underpin the ethos of the school to play a positive role model in preventing extremism. These are developed, understood, and shared by leaders at all levels in the school; the senior leadership team and all employees and then made explicit to Students.
- 8.2.3 Team Members will:
- Create explicit value statements that are inclusive of all students.
 - Review curriculum and learner participation and safeguarding processes.
 - Develop personal thinking skills and use curriculum opportunities including group work.
 - Implement social and emotional aspects of learning.
 - Explore and promote diversity and shared values between and within communities.
 - Challenge Islamophobia, anti-Semitism, and other prejudices.
 - Support those at risk of being isolated.
 - Build ties with all local communities, seeking opportunities for links with other schools.
 - Use anti-bullying strategies to minimise hate and prejudice-based bullying.

- 8.2.4 The resources aim to build ties with all local communities, seeking opportunities for linking with other schools.
- 8.2.5 The resources promote a shared culture of openness and pluralism in the school and with the wider community, regardless of the specific status, location, or faith affiliation of the school.
- 8.2.6 The school/college focuses directly on the learning, teaching, and curriculum aspects of a whole school approach. It is important, however, to see the connections between the learning, teaching and curriculum elements and the other dimensions of a whole school approach.
- 8.2.7 In approaching the issues outlined above the school will support Students through an entry point of learning. Teaching and the curriculum therefore require some thought to be given to teaching style. A curriculum and pedagogy for Students to support them in achieving the goals outlined above will include:
- promoting knowledge, skills and understanding to build the resilience of Students;
 - exploring controversial issues;
 - recognising local needs;
 - challenging extremist narratives;
 - promoting universal rights;
 - promoting critical analysis; and
 - promoting pro-social values.
- 8.2.8 Effectively tackling controversial issues can help Students challenge the perceptions and misconceptions of their own and others'. To do this classroom practices can include:
- developing questioning techniques to open up safe debate
 - building confidence to promote honesty about a plurality of views
 - ensuring freedom of expression and freedom from threat
 - debating fundamental moral and human rights principles
 - promoting open respectful dialogue
 - affirming multiple identities
- 8.2.9 Management at the school/college (and residential services where applicable) will:
- Work with Safer School Partnerships police officers and Local Authority 'Prevent' employees to deliver training to employees, parents, and governors.
 - Facilitate a session of Act Now or Internet Safety; where appropriate use external agencies to deliver training to employees, parents, and investors.
 - Promote equal opportunity and tackling discrimination to challenge the ideology that underpins extremist belief.
 - Work with other agencies through safeguarding processes, such as CHANNEL, suitable for Young People who are thought to be vulnerable to radicalisation.
 - Develop positive relationships with the wider community.
- 8.2.10 Effective school/college leadership and management will focus on the:
- leadership, values, and ethos of the school/college

- learning, teaching, and the curriculum
- learner support processes
- management of risks and responding to events
- relationship between the school and its community
- evaluation of the progress being made

9. Governance

9.1 Training requirements

- 9.1.1 Phoenix will provide Prevent training and then on a refresher basis to ensure consistency of approach.
- 9.1.2 This training is provided by the Home Office through eLearning.
- 9.1.3 Supervision and appraisal of team members will identify any additional learning needs in this area.

9.2 Equality

- 9.2.1 All team members are required to comply with this procedure and must demonstrate sensitivity and competence in relation to diversity in race, faith, age, gender, disability, and sexual orientation. If you, or any other groups, believe a person has been disadvantaged by this procedure please contact your Line Manager. Phoenix will then actively respond to the enquiry.

9.3 Setting level auditing

- 9.3.1 The Manager of each Setting must ensure the following:
 - 1. Every Employee is trained in Prevent.
 - 2. That all support plans have appropriate guidelines in place to keep people we support safe from radicalisation.

9.4 Quality Assurance

- 9.4.1 The Area Manager/Regional Education Lead/Residential Operations Manager will monitor risks of radicalisation through incident report reviews.
- 9.4.2 The Quality Department will undertake an annual inspection of each setting where risks and plans will be reviewed.

10. Appendix 1 – Making a judgment

10.1.1 When making a judgement, team members 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 sympathise 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 race hate or a 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?

11. Appendix 2 – The use of social media in radicalisation

- 11.1.1 Briefing note for education and schools July 2015 (Revised Prevent Duty Guidance for England and Wales updated April 2021)
- 11.1.2 There is increasingly widespread recognition that terrorist and extremist organisations are utilising the Internet and Social Media for the radicalisation and grooming of Young People. Further to this, the Department for Education and the Home Office have issued the joint enclosed briefing note (see link below) for schools and schools highlighting some of these aspects and actions providers should take.
- 11.1.3 https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/440450/How_social_media_is_used_to_encourage_travel_to_Syria_and_Iraq.pdf
- 11.1.4 Further advice for schools can be found below including a toolkit:
- 11.1.5 https://dera.ioe.ac.uk/8396/1/DCSF-Learning%20Together_bkmk.pdf
- 11.1.6 Further Contacts for more information if needed can be obtained from the following the Prevent Lead.

12. Appendix 3 – Good practice for the Prevent duty

1. Leadership and management

- a. When and if the police contact a service with concerns these go straight to the Senior Manager and the DSL is informed.
- b. Preventing Extremism is integrated into Safeguarding procedures.

2. Training

- a. All learners in the Phoenix education provisions will be made aware of what to be alert to in terms of students or staff extremism.
- b. Phoenix staff are trained in Prevent by an accredited trainer.

3. Communication

- a. All services have a DSL and there is an organisational Prevent Lead who has effective communications with local Prevent coordinator.

4. Policies which should be reviewed to ensure they cover the Prevent duty.

- a. There is a specific Anti-radicalisation policy covering Prevent.
- b. IT policy / Acceptable use.
- c. Code of Conduct.

5. Education: Curriculum – formal and informal

- a. Through delivery of education the Learners will develop critical thinking skills which will support them in resisting extremism
- b. There are opportunities for all Learners to discuss challenging topics and events in a supported environment both in and out of the classroom.
- c. All Staff develop their own approach to implementing British values to support students in resisting extremism while developing their political views in all of their planning and contact with learning development.

6. Clear agreed referral channels

- a. Every person in the college including people we support knows what they need to do if they are concerned about a peer or member of staff.
- b. The process of referral within our services has a clear flow chart (see start of policy)
- c. The process for referring is labelled on the flow chart (see reverse)

If you recognise someone who is at risk from radicalisation, you need to liaise with you safeguarding lead and follow the flow chart below;

13. Appendix 4 – Approach to the Channel Process within Phoenix

