

# EDA COLLEGE



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## Prevent and Counterterrorism Policy<sup>1</sup>

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<sup>1</sup> In accordance with the Counterterrorism and Security Act 2015 and Home Office Prevent Guidance for Higher Education

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## 1. Introduction and Purpose

EDA College (“the College”) is committed to the safety and wellbeing of all its students, staff and visitors. This includes protecting them from the harms associated with radicalisation and violent extremism. The College believes that higher education should be a place of intellectual openness, challenge and debate — and that this is best protected by creating an environment in which students and staff are resilient to extremist ideas and where concerns can be raised and addressed promptly and sensitively.

This policy sets out EDA College’s approach to discharging its Prevent duty under the Counter-Terrorism and Security Act 2015 (“the Act”). The Prevent duty requires the College to have ‘due regard’ to the need to prevent people from being drawn into terrorism. This does not mean treating students and staff with suspicion — it means creating a safe, supportive environment where vulnerabilities can be identified early and appropriate support provided.

Prevent is one strand of the government’s counter-terrorism strategy, CONTEST, and sits alongside Pursue (disrupting terrorist activity), Protect (strengthening our protection against terrorist attack) and Prepare (mitigating the impact of an attack). The Prevent strand focuses on stopping people becoming terrorists or supporting terrorism.

“EDA College’s Prevent approach is rooted in our commitment to student and staff wellbeing. We see Prevent as a safeguarding issue — our duty is to support vulnerable individuals, not to police the thoughts or beliefs of our community. We are committed to getting this balance right.”

**IMPORTANT:** This policy must be read alongside EDA College’s Safeguarding and Child Protection Policy, Freedom of Speech and Academic Freedom Policy, and Equality, Diversity and Inclusion Policy. The Prevent duty must be discharged in a manner that is consistent with the College’s commitments to civil liberties, free speech and equality.

## 2. Legislative and Regulatory Framework

Legislation / Guidance	Relevance
<b>Counter-Terrorism and Security Act 2015 (CTSA 2015)</b>	Section 26 imposes a duty on specified authorities, including higher education institutions, to have ‘due regard’ to the need to prevent people from being drawn into terrorism
<b>Prevent Duty Guidance for England and Wales (2015, updated 2023)</b>	Statutory guidance setting out how higher education institutions should discharge the Prevent duty, including requirements for staff training, risk assessment, partnership working and external speaker vetting
<b>Higher Education Prevent Guidance (DfE / Home Office, 2015)</b>	Specific guidance for the higher education sector on implementing Prevent, including the importance of balancing Prevent with academic freedom
<b>Revised Prevent Duty Guidance (2023)</b>	Updated statutory guidance strengthening requirements around referrals, risk assessment and partnership with local authorities
<b>Channel Duty Guidance (2023)</b>	Sets out the Channel programme and how referrals should be made and managed
<b>Terrorism Act 2000 / Terrorism Act 2006</b>	Define terrorism and terrorism offences; apply to staff and students at EDA College
<b>OfS Regulatory Framework — Condition D</b>	OfS requires registered providers to comply with applicable legislation, including the Prevent duty
<b>Higher Education (Freedom of Speech) Act 2023</b>	The Prevent duty must be balanced against and is not inconsistent with the duty to secure freedom of speech and academic freedom
<b>Equality Act 2010</b>	The Prevent duty must be implemented in a manner that does not discriminate unlawfully on the basis of any protected characteristic, particularly religion, race and belief
<b>UK GDPR / Data Protection Act 2018</b>	Information shared in connection with Prevent referrals must be handled in accordance with data protection law

### 3. Scope and Application

This policy applies to:

- All enrolled students of EDA College, on any programme of study
- All members of staff, including academic staff, professional services staff, senior leaders and governors
- All contractors, agency workers and volunteers working on College premises or in College-organised activities
- All visitors to College premises, including visiting speakers, external partners and members of the public attending College events
- All online platforms and digital resources operated by or on behalf of EDA College

The Prevent duty applies to all forms of terrorism and all forms of extremism, whether far-right, far-left, Islamist, or any other ideology that promotes, supports or encourages terrorist activity or violent extremism. EDA College will apply this policy consistently and fairly across all ideologies and communities.

The Prevent duty applies to ALL forms of violent extremism — not only Islamist extremism. Far-right extremism, incel ideology, eco-terrorism, animal rights extremism, and domestic extremism all fall within scope. Staff should be equally alert to signs of radicalisation regardless of the ideology involved. Applying Prevent disproportionately to any one community or religion is unlawful and contrary to this policy.

### 4. Definitions: Radicalisation, Extremism and Terrorism

Term	Definition
<b>Terrorism</b>	The use or threat of action designed to influence a government or international organisation or to intimidate the public, where the action involves serious violence, serious damage to property, serious risk to public health or safety, or serious disruption to electronic systems, and where the use or threat is for the purpose of advancing a political, religious, racial or ideological cause (Terrorism Act 2000, s.1)
<b>Extremism</b>	Vocal or active opposition to the fundamental values of British society, including democracy, the rule of law, individual liberty and mutual respect and tolerance of different faiths and beliefs. This includes calling for the death of members of the armed forces. Note: extremism does not have a single legal definition and the term must be applied carefully.
<b>Radicalisation</b>	The process by which a person comes to support terrorism and extremist ideologies associated with terrorist groups. Radicalisation is a process, not a single event — it typically involves a gradual shift in beliefs, attitudes and behaviours over time.
<b>British Values</b>	Democracy; the rule of law; individual liberty; mutual respect and tolerance of those with different faiths and beliefs. These values are upheld by EDA College in its teaching, learning and institutional conduct.
<b>Vulnerability</b>	A combination of factors (personal, social, environmental) that may make an individual more susceptible to radicalisation. Vulnerability is not a fixed characteristic and can change over time. Identification of vulnerability is not the same as suspicion of criminal activity.
<b>Channel</b>	A multi-agency programme designed to provide support to individuals who are identified as being vulnerable to being drawn into terrorism. Channel is voluntary and confidential. It is a safeguarding programme, not a criminal justice programme.
<b>CONTEST</b>	The UK government’s counter-terrorism strategy, comprising four strands: Prevent (stop people becoming terrorists), Pursue (disrupt terrorist plots), Protect (strengthen our defences) and Prepare (minimise the impact of an attack). Prevent is the only strand that applies to EDA College’s day-to-day operations.

## 5. EDA College's Prevent Duty Obligations

Under the Counterterrorism and Security Act 2015 and the associated statutory guidance, EDA College is required to demonstrate 'due regard' to the Prevent duty by meeting the following key obligations:

Obligation	What It Requires	EDA College's Approach
<b>Risk Assessment</b>	Assess the risk of students being drawn into terrorism or extremism and document this assessment	Annual Prevent Risk Assessment maintained and reviewed; presented to Academic Board
<b>Action Plan</b>	Develop and implement an action plan to manage identified risks	Annual Prevent Action Plan, linked to this policy and reviewed by the Board
<b>Prevent Lead</b>	Appoint a senior member of staff as the Prevent Lead with responsibility for coordinating the College's Prevent activities	Principal acts as Prevent Lead until a dedicated lead is appointed
<b>Staff Training</b>	Ensure that all staff receive appropriate Prevent awareness training	All staff complete WRAP (Workshop to Raise Awareness of Prevent) or equivalent training on joining and annually thereafter
<b>Partnership Working</b>	Work with local police, Channel panels, local authorities and other partners	Annual engagement with West Midlands Police Prevent team; participation in Channel panels where required
<b>External Speakers</b>	Have a process for vetting external speakers to ensure College premises are not used to promote extremist views	External Speaker vetting process in place; linked to Freedom of Speech Policy
<b>IT Policies</b>	Ensure IT policies are in place to prevent students from accessing extremist or terrorist content	IT Acceptable Use Policy; filtering and monitoring of College IT systems
<b>Welfare and Pastoral Support</b>	Ensure that students identified as vulnerable have access to appropriate welfare support	Personal Academic Tutor system; Manager of Student Services; referral to Channel where appropriate
<b>Annual Prevent Return</b>	Submit the DfE / Home Office Prevent Return annually	Manager of Finance / Academic Registrar submits annual return by published deadline

## 6. Risk Assessment

### 6.1 Institutional Risk Assessment

EDA College is required to conduct and maintain a Prevent Risk Assessment that identifies the specific risks of radicalisation relevant to the College's student community, geographic location and programme portfolio. The Risk Assessment is conducted annually by the Prevent Lead and presented to the Academic Board.

EDA College's Prevent Risk Assessment considers the following factors:

- The demographic profile of EDA College's student community and the communities they come from
- The geographic and social context of EDA College's location in Shirley, Birmingham, including intelligence from the local police Prevent team
- The subject areas and programme portfolio offered by the College and any particular vulnerabilities associated with them
- Historical referrals and concerns raised at EDA College
- National and local threat assessments provided by the Home Office and NPCC
- Intelligence and information from West Midlands Police and the local Channel panel

## 6.2 Risk Levels

The current assessed Prevent risk level for EDA College is reviewed annually and may be classified as follows:

Risk Level	Indicators	Response
<b>LOW</b>	No specific intelligence of concern; general Prevent awareness measures in place	Maintain standard Prevent programme: training, risk assessment, external speaker vetting, IT controls
<b>MEDIUM</b>	Some concerning activity identified; one or more referrals made; intelligence suggests elevated risk in local area or student community	Enhanced monitoring; additional staff training; proactive engagement with local Prevent team; review of IT controls
<b>HIGH</b>	Credible and specific concern regarding one or more individuals; imminent risk of harm	Immediate referral to police and / or Channel; senior leadership involved; liaison with OfS if required; heightened security measures

## 6.3 Local Partnership Intelligence

EDA College will engage with West Midlands Police Counter-Terrorism Unit and the Birmingham Prevent coordinator on at least an annual basis to receive local intelligence briefings and to share relevant information about the College's risk profile. This engagement will inform the annual Prevent Risk Assessment.

## 7. Prevent Lead

### 7.1 Role and Responsibilities

EDA College's Prevent Lead is the Principal, acting in this capacity until a dedicated Prevent Lead is appointed. The Prevent Lead is responsible for:

- Overseeing EDA College's compliance with the Prevent duty
- Maintaining and annually reviewing the Prevent Risk Assessment and Action Plan
- Receiving and assessing all Prevent referrals made by staff
- Making decisions on whether to refer individuals to the Channel panel
- Liaising with West Midlands Police Counter-Terrorism Unit and the Birmingham Channel panel
- Ensuring all staff complete Prevent training and maintaining training records
- Overseeing the external speaker vetting process
- Submitting the annual Prevent Return to the DfE / Home Office
- Reporting to the Academic Board on Prevent matters at least annually
- Advising the Board on changes to the national or local threat picture and their implications for EDA College

### 7.2 Deputy Prevent Lead

The Academic Registrar will act as Deputy Prevent Lead and will be fully briefed on EDA College's Prevent arrangements. The Deputy Prevent Lead will carry out the Prevent Lead's responsibilities in their absence.

### 7.3 Prevent Lead Training

The Prevent Lead must complete the Home Office's Prevent Senior Designated Lead training within three months of taking up the role and refresh this training every two years. The Deputy Prevent Lead must complete the WRAP training and a suitable lead-level Prevent course within three months of appointment.

## 8. Staff Training

EDA College is committed to ensuring that all staff have sufficient knowledge and skills to fulfil their Prevent responsibilities. The following training framework applies:

Training	Audience	Delivery	Frequency	Lead
<b>WRAP (Workshop to Raise Awareness of Prevent)</b>	All staff (mandatory)	Online (Home Office WRAP e-learning) or face-to-face delivered by trained facilitator	On joining; refreshed annually	Prevent Lead
<b>Prevent Awareness Briefing</b>	All governors	Briefing from Prevent Lead; supplemented by Home Office resources	On appointment; annually	Prevent Lead / Principal
<b>Prevent Senior Designated Lead Training</b>	Prevent Lead and Deputy	Home Office approved training programme	On appointment; every 2 years	External (Home Office approved)
<b>Channel Panel Training</b>	Prevent Lead and Deputy	Home Office Channel Panel training	Before attending first panel; refreshed as required	External (Home Office)
<b>Contextualised Prevent Briefing</b>	All new staff in student-facing roles	Induction briefing from Prevent Lead covering local risk context and referral procedure	On joining	Prevent Lead
<b>Prevent Refresher and Update</b>	All staff	Annual update session covering changes to Prevent guidance, new threats and lessons learned	Annually	Prevent Lead

Training completion records are maintained by the Academic Registrar and reported to the Academic Board annually. Staff who do not complete mandatory Prevent training within the required timescale will have their access to student-facing responsibilities reviewed until training is completed.

## 9. Identifying Vulnerability to Radicalisation

Radicalisation is a process, not a sudden change. It typically involves a gradual shift in an individual's beliefs, attitudes, social connections and behaviours. EDA College staff are not expected to be experts in identifying radicalisation, but they are expected to be alert to possible signs of concern and to share those concerns with the Prevent Lead without delay.

### 9.1 Understanding Vulnerability

Individuals may be vulnerable to radicalisation for a range of reasons, including:

- A sense of grievance, injustice or humiliation, whether personal, social or political
- Identity crisis or a search for belonging and significance
- Exposure to extremist propaganda online or through personal contacts
- Social isolation or disconnection from mainstream community
- Mental health difficulties that may make an individual more susceptible to manipulation
- Significant personal trauma or crisis
- Living in or being connected to communities affected by conflict or displacement

It is important to emphasise that vulnerability to radicalisation is not linked to any faith, ethnicity or cultural background. Factors that increase vulnerability are individual and context specific.

## 9.2 Signs of Possible Concern

The following behaviours or changes in behaviour may — in combination with other factors — indicate that an individual is being radicalised or is at risk of being drawn into extremism. No single indicator is sufficient to conclude that radicalisation is occurring, and many of these behaviours may have completely innocent explanations. Staff must exercise professional judgement and share concerns rather than investigate independently.

See Appendix A for the full Signs of Radicalisation Awareness Guidance for staff. The indicators below are a summary only — Appendix A provides more detailed guidance, including contextual factors and common pitfalls to avoid.

Category	Possible Indicators (to be considered in context)
<b>Behavioural changes</b>	Sudden or significant change in behaviour, demeanour or social connections; increased secrecy or withdrawal from previously enjoyed activities; distancing from friends and family; new and intense friendship groups of unknown origin
<b>Expression of views</b>	Expressing sympathy for or justifying the use of violence to achieve political, religious or ideological goals; expressing support for terrorist organisations or their ideology; dehumanising language toward particular groups or communities; expressing belief that violence is the only solution to political problems
<b>Online activity</b>	Seeking out extremist content online; sharing extremist material on social media; using coded language associated with extremist movements; joining encrypted or private online groups connected to extremist ideology
<b>Travel and contacts</b>	Unexplained or sudden interest in travelling to conflict zones; association with individuals known to hold extremist views; unexplained international contacts or communications
<b>Materials and possession</b>	Possession of extremist literature, propaganda or materials; viewing or downloading terrorist-related content; producing materials that glorify or promote violence or extremism
<b>Social withdrawal</b>	Withdrawal from multicultural groups; expressed hostility toward specific religious, ethnic or political communities; increased social isolation combined with other indicators

Staff must NOT investigate suspected radicalisation themselves, confront the individual concerned, or share concerns with anyone other than the Prevent Lead. Unauthorised investigation or disclosure can compromise safeguarding referrals and put both the individual and staff members at risk. If in doubt, refer to the Prevent Lead immediately.

## 10. Referral Procedure

### 10.1 When to Refer

Any member of staff who has a concern about a student or colleague that relates to possible radicalisation or vulnerability to extremism must refer that concern to the Prevent Lead without delay. You do not need to be certain that radicalisation is occurring — it is sufficient that you have a genuine and reasonable concern. It is always better to refer and have a concern assessed than to remain silent.

### 10.2 Referral Steps

Step	Action	By Whom
<b>1</b>	IDENTIFY: You observe behaviour or receive information that gives rise to a genuine Prevent concern. Do not investigate; do not confront the individual.	Concerned member   staff
<b>2</b>	RECORD: Make a note of the specific behaviours, information or events that have given rise to your concern, including dates, times and witnesses where relevant.	Concerned member   staff

3	REFER: Contact the Prevent Lead (or Deputy if unavailable) without delay. If the matter is urgent (imminent risk of harm or a credible threat), call 999 and the Prevent Lead simultaneously.	Concerned member	staff
4	COMPLETE FORM: The referring member of staff completes the Prevent Referral Form (Appendix B) and submits it to the Prevent Lead within 24 hours of the verbal referral.	Concerned member	staff
5	ASSESS: The Prevent Lead reviews the referral and assesses whether there is a genuine Prevent concern warranting further action. The Prevent Lead may gather additional information from the Academic Registrar or other relevant staff.	Prevent Lead	
6	DECIDE: The Prevent Lead decides on the appropriate course of action: no further action (with reasons recorded); informal support and monitoring; formal Channel referral; or referral to police where there is a risk of harm.	Prevent Lead	
7	REFER TO CHANNEL: Where the Prevent Lead determines a Channel referral is appropriate, the referral is made to the Birmingham Channel panel. The individual's consent is normally sought before referral (see Section 11).	Prevent Lead	
8	FEEDBACK: The referring member of staff is informed of the outcome of their referral, to the extent that confidentiality permits.	Prevent Lead	
9	RECORD: All referrals, decisions and actions are recorded in the Prevent Referral Log (maintained by the Prevent Lead and held securely).	Prevent Lead / Academic Registrar	

### 10.3 Urgent Referrals

Where a staff member has reason to believe that there is an imminent threat of harm to any person, or where they discover materials or plans suggesting an imminent terrorist attack is being planned, they should:

- Call 999 immediately
- Contact the Prevent Lead immediately after calling 999
- Ensure the safety of students and other staff in the vicinity
- Not attempt to apprehend or confront the individual
- Preserve any evidence, but only if it is safe to do so
- Follow the College’s Critical Incident Response procedures

The Anti-Terrorist Hotline is available 24/7: 0800 789 321. This can be used to report non-emergency terrorism-related concerns confidentially. The online reporting tool is available at [www.gov.uk/report-terrorism](http://www.gov.uk/report-terrorism)

## 11. Channel

### 11.1 What Is Channel?

Channel is a multi-agency, voluntary programme that provides support to individuals who have been identified as being vulnerable to being drawn into terrorism. It is a safeguarding programme — not a criminal justice or intelligence programme. Channel is designed to provide early intervention before any criminal activity occurs.

Channel panels are coordinated by the local authority and typically include representatives from police, health, education, social care and other relevant agencies. Channel panels assess the nature and extent of an individual’s vulnerability and, if appropriate, agree a tailored support package.

### 11.2 EDA College’s Role in Channel

As a higher education institution, EDA College may:

- Make referrals to the Birmingham Channel panel where the Prevent Lead has assessed an individual as potentially vulnerable to radicalisation
- Be requested to provide information about a student to a Channel panel (with appropriate legal authority)
- Be invited to participate in a Channel panel to provide information and to contribute to a support plan for a student

- Be asked to implement elements of a Channel support plan (e.g. mentoring, academic support, monitoring arrangements)

### 11.3 Consent

Channel support is voluntary. Before making a Channel referral for an adult (aged 18 or over), the Prevent Lead will normally seek the individual's consent to the referral. However, consent is not always required — in particular where seeking consent would undermine the purpose of the referral or where there is an immediate safeguarding concern.

For students under the age of 18, consent will be sought from the student's parent or guardian, unless doing so would put the student or others at risk.

### 11.4 Confidentiality of Channel Referrals

Channel referrals are treated with the highest level of confidentiality. Information about a referral will be shared only with those who have a legitimate need to know — including the Prevent Lead, the Channel panel, and (where appropriate) the individual's Personal Academic Tutor. Information will be handled in accordance with UK GDPR and the College's Data Protection Policy.

## 12. Information Sharing and Confidentiality

The Prevent duty involves handling sensitive personal information. EDA College will manage information in connection with Prevent in accordance with the following principles:

- Information about Prevent concerns and referrals will be shared on a strictly 'need to know' basis
- Information will be shared with external agencies (including police and Channel) only where there is a legal basis for doing so, such as the prevention or detection of crime, the protection of vital interests, or compliance with a legal obligation
- The Data Protection Act 2018 provides exemptions from certain data protection principles where processing is necessary for national security, crime prevention or safeguarding purposes — these exemptions apply to Prevent activity where relevant
- The Prevent Lead will seek advice from the College's Data Protection Officer where there is uncertainty about the lawfulness of sharing information
- All information shared in connection with Prevent referrals will be recorded in the Prevent Referral Log
- Information will not be shared with the individual who is the subject of a concern unless the Prevent Lead has determined that doing so would not undermine the referral process or put any person at risk

Information sharing in the Prevent context may engage the following legal gateways:

Legal Gateway	When It Applies
<b>s.29 Data Protection Act 2018</b>	Sharing with law enforcement where necessary for the prevention or detection of crime or the apprehension or prosecution of offenders
<b>s.35 Data Protection Act 2018</b>	Sharing where required by law or for legal proceedings
<b>Vital interests (UK GDPR Art. 6(1)(d))</b>	Sharing where necessary to protect the vital interests (life) of the data subject or another person
<b>Public task (UK GDPR Art. 6(1)(e))</b>	Sharing in the exercise of a public function, where this applies to EDA College's activities
<b>Common law duty of care</b>	Sharing to protect individuals from harm, consistent with established legal principles

## 13. Protecting Students Online

The internet is a primary vehicle for the dissemination of extremist content and for the radicalisation of vulnerable individuals. EDA College is committed to ensuring that its IT systems and digital environment are managed in a way that reduces exposure to harmful online content without unduly restricting legitimate academic activity.

### 13.1 Filtering and Monitoring

- EDA College's IT systems are configured with appropriate content filtering to prevent access to websites known to contain extremist or terrorist content, illegal material, or content that promotes violence
- The College's network monitoring system may identify unusual activity patterns that could indicate access to extremist content or communications
- Network monitoring data that raises a Prevent concern will be referred to the Prevent Lead for assessment
- Students and staff will be informed in the IT Acceptable Use Policy that College systems may be monitored for security and safeguarding purposes

### 13.2 IT Acceptable Use Policy

The College's IT Acceptable Use Policy prohibits the use of College IT systems, networks and devices to:

- Access, view, download or share extremist or terrorist content
- Communicate with terrorist organisations or individuals known or suspected to be involved in terrorism
- Share or distribute materials that glorify, promote or support terrorism or violent extremism
- Engage in activity that could constitute a terrorism offence under the Terrorism Act 2000 or 2006

### 13.3 Online Safety Awareness

EDA College will provide students with awareness of online safety issues, including the risks associated with extremist content and radicalisation online, as part of the student induction programme and through targeted communications. Students will be encouraged to report concerns about online extremist content to the Prevent Lead.

## 14. External Speakers and Events

EDA College is committed to being an institution where a wide range of views can be expressed and debated. At the same time, the College has a duty to ensure that its premises and platforms are not used to promote extremist views or to facilitate radicalisation. These two commitments are complementary, not contradictory.

The process for managing external speakers is set out in full in EDA College's Freedom of Speech and Academic Freedom Policy (Section 11). The Prevent-specific requirements are:

### 14.1 Speaker Vetting

- All external speakers must be notified to the Prevent Lead as part of the External Speaker Request Form process
- The Prevent Lead (or a designated reviewer) will conduct an assessment of any Prevent-related concerns about a proposed speaker, drawing on publicly available information and, where appropriate, intelligence from the local police Prevent team
- A speaker will not be refused solely because their views are controversial, offensive or critical of government policy — this would be inconsistent with EDA College's freedom of speech commitments
- A speaker may be refused where there is credible and specific evidence that they intend to use the platform to promote terrorism, violent extremism or the incitement to violence
- All vetting decisions will be recorded, including the basis for the decision

### 14.2 Managing Events

- The Prevent Lead should be notified of any event that could attract Prevent-related concerns, so that appropriate measures can be considered
- Where an event on a sensitive topic is approved, the College may require the event to be chaired, may require a response to be available, or may impose other reasonable conditions

- Staff and students attending events should be alert to content that may raise Prevent concerns and should report such concerns to the Prevent Lead after the event
- Events that attract a large audience from outside the College may require a risk assessment and liaison with the local police Prevent team

## 15. Partnership Working

Prevent is most effective when institutions work in partnership with statutory agencies, local communities and other organisations. EDA College’s partnership arrangements include:

Partner	Nature of Partnership	Frequency of Contact
<b>West Midlands Police — Counter Terrorism Unit (CTU)</b>	Receive local Prevent intelligence briefings; discuss specific cases where appropriate; consult on the annual risk assessment	At least annually; as required for specific cases
<b>Birmingham City Council Prevent Coordinator</b>	Receive local strategic briefings; discuss risk assessment; participate in local Prevent community activities	At least annually
<b>Birmingham Channel Panel</b>	Make referrals for vulnerable students; participate in panels as required; implement support plans	As cases arise
<b>Birmingham Newman University (Awarding Body)</b>	Share Prevent good practice; align approaches where appropriate; notify of significant concerns relating to programmes	As required
<b>Office for Students (OfS)</b>	Comply with OfS Prevent-related regulatory requirements; report significant incidents as required by OfS guidance	As required by OfS guidance
<b>Advance HE / Independent HE</b>	Engage with sector Prevent guidance and training resources; participate in sector benchmarking	As relevant
<b>Local faith and community organisations</b>	Build positive community relationships that support Prevent objectives; seek guidance on community dynamics where relevant	As appropriate; informally

## 16. Prevent and Freedom of Speech

The Prevent duty and the duty to secure freedom of speech and academic freedom under the Higher Education (Freedom of Speech) Act 2023 are both legal obligations on EDA College. They are not inherently contradictory — both are designed to protect individuals and to maintain a healthy and open academic environment. However, EDA College recognises that getting the balance right requires careful judgement.

The following principles govern EDA College’s approach to balancing Prevent and freedom of speech:

- Freedom of speech does not extend to speech that constitutes a terrorism offence or that incites violence. Prevent measures that prevent unlawful speech are consistent with freedom of speech.
- Expressing controversial, offensive or unpopular political, religious or ideological views — including views critical of government foreign or domestic policy — is not evidence of radicalisation and does not justify Prevent intervention.
- Prevent referrals must be based on genuine, evidence-based concerns about vulnerability to violent extremism, not on discomfort with controversial opinions or lawful political advocacy.
- EDA College will not use Prevent as a pretext to restrict lawful speech, academic debate or the expression of minority political, religious or cultural views.
- When considering whether to refer a concern, the Prevent Lead must consider whether the behaviour in question relates to the promotion of violent extremism or constitutes lawful (if controversial) speech. If in doubt, the Prevent Lead should seek advice from the local police Prevent team before taking action.

EDA College will never refer a student or member of staff to Channel or to the police solely on the basis of their lawful political, religious or ideological views, however controversial those views may be. Referrals must be grounded in genuine evidence of vulnerability to violent extremism.

## 17. Prevent and Equalities

EDA College is committed to implementing the Prevent duty in a manner that is consistent with its obligations under the Equality Act 2010 and its EDI Policy. The following commitments apply:

- Prevent training and awareness activities will emphasise that vulnerability to radicalisation is not associated with any particular faith, ethnicity, nationality or cultural background
- Staff will be trained not to make assumptions about Prevent risk based on a person's religion, race, ethnicity or appearance
- The College will monitor its Prevent referrals by protected characteristic and will investigate any significant disparities that could indicate discriminatory application of Prevent
- EDA College will not profile students or staff on the basis of race, religion or ethnicity in connection with Prevent. Profiling of this kind is unlawful and contrary to this policy.
- The College will ensure that Prevent activity does not create a climate of suspicion or surveillance that disproportionately affects students from particular communities
- The College will build positive relationships with all communities it serves, including Muslim students, to ensure that Prevent is seen as a safeguarding programme that benefits all, not a programme that stigmatises particular groups
- Any staff member who applies Prevent in a manner that discriminates on the basis of a protected characteristic will be subject to disciplinary action

Prevent referrals that appear to be motivated by racial, religious or other prejudice rather than a genuine and evidence-based concern about radicalisation will be reported to the Principal and investigated under the College's Disciplinary Procedure. Discriminatory application of Prevent is both unlawful and damaging to community relations.

## 18. Support for Individuals of Concern

The College's primary approach to Prevent is pastoral and supportive. The goal is to help vulnerable individuals — not to punish them. The following support mechanisms are available:

- **Personal Academic Tutor (PAT):** all students are assigned a PAT who can provide pastoral support and can identify early signs of concern. Where appropriate, the PAT may be involved in supporting a student who has been referred to Channel, with the agreement of the Prevent Lead and the student
- **Manager of Student Services:** the College's Student Services team can provide pastoral support, welfare advice and referrals to external support services for students experiencing personal difficulties that may make them vulnerable
- **Mental health and wellbeing referrals:** where a Prevent concern is connected to an individual's mental health, the College will facilitate access to appropriate mental health support as part of the response
- **Channel support plan:** where a student is referred to and engaged with Channel, the College will cooperate with the Channel panel to deliver any elements of the support plan that fall within its remit
- **Continued support post-referral:** making a Prevent referral does not mean withdrawing support from an individual. The College will continue to provide appropriate academic and pastoral support to all enrolled students, including those who are the subject of Prevent concerns
- **Exit from Channel:** where a student's Channel engagement concludes, the College will provide appropriate ongoing support to help them reintegrate fully into College life

EDA College recognises that students referred through Prevent have not committed a criminal offence and should not be treated as suspects. The College's duty of care continues throughout any Prevent process.

## 19. Record Keeping

EDA College will maintain the following records in connection with its Prevent activities:

Record	Content	Retention	Custodian
<b>Prevent Referral Log</b>	All concerns raised; referrals made; decisions taken; Channel referrals; outcomes	6 years from last action; longer where linked to criminal proceedings	Prevent Lead (held securely)
<b>Prevent Risk Assessment</b>	Annual risk assessment document; risk level; identified risks; mitigating actions	5 years	Prevent Lead
<b>Prevent Action Plan</b>	Annual action plan; progress updates; Board approvals	5 years	Prevent Lead / Academic Registrar
<b>Staff Prevent Training Records</b>	Names of staff; training completed; dates; provider	3 years from end of employment	Academic Registrar / HR
<b>External Speaker Prevent Vetting Records</b>	Speaker details; vetting outcome; basis for decision	6 years	Academic Registrar
<b>Annual Prevent Return</b>	Copy of annual DfE / Home Office submission	5 years	Academic Registrar
<b>Channel Panel Records</b>	Anonymised records of Channel panel involvement; support plans (held securely and separately)	As directed by Channel panel; normally 6 years	Prevent Lead (maximum confidentiality)

All Prevent records are stored securely with access restricted to the Prevent Lead, Deputy Prevent Lead and, where necessary, the Principal. Channel-related records are held with particular care given the sensitivity of the information involved. All records are managed in accordance with EDA College's Data Protection and Privacy Policy.

## 20. Reporting Terrorist Incidents or Threats

In the event of an actual or suspected terrorist incident on or near College premises, or if EDA College receives a credible terrorist threat, the following immediate actions apply:

Action	What to Do	Priority
<b>CALL 999</b>	Call 999 immediately. Provide your name, location and as much detail about the threat or incident as possible. Do not end the call unless instructed to.	<b>FIRST</b>
<b>ALERT STAFF</b>	Activate the College's emergency alert procedure. Ensure all staff are aware of the situation.	<b>IMMEDIATELY</b>
<b>EVACUATE OR LOCK DOWN</b>	Depending on the nature of the threat, implement evacuation or lockdown procedures in accordance with the College's Emergency Response Plan.	<b>AS DIRECTED</b>
<b>DO NOT INVESTIGATE</b>	Do not approach the source of the threat; do not attempt to resolve the situation; do not enter any area that may be unsafe.	<b>ALWAYS</b>
<b>NOTIFY PREVENT LEAD</b>	Notify the Principal (acting as Prevent Lead) once immediate safety has been addressed.	<b>AS SOON AS SAFE</b>
<b>PRESERVE EVIDENCE</b>	Do not disturb any area or materials unless directed to do so by police. Preserve CCTV footage where possible.	<b>AS DIRECTED BY POLICE</b>
<b>NOTIFY OfS</b>	Where the incident involves actual or suspected terrorism and affects the College's ability to operate, notify the OfS as soon as reasonably practicable.	<b>WITHIN 24 HOURS</b>

EDA College's Emergency Response Plan, which includes procedures for lockdown and evacuation, is held by the Principal, Academic Registrar and IT Manager. All staff should familiarise themselves with the Emergency Response Plan as part of their induction.

## 21. Monitoring, Review and Governance

EDA College's Prevent arrangements are subject to the following governance and monitoring framework:

Activity	Lead	Frequency	Reported To
<b>Annual Prevent Risk Assessment</b>	Prevent Lead	Annual (August / September)	Academic Board
<b>Annual Prevent Action Plan</b>	Prevent Lead	Annual	Academic Board
<b>Annual Prevent Return (DfE / Home Office)</b>	Prevent Lead / Academic Registrar	Annual (by published deadline)	DfE / Home Office
<b>Staff Prevent training completion report</b>	Academic Registrar	Annual	Academic Board
<b>Prevent referrals log review</b>	Prevent Lead	Termly (anonymised summary)	Principal
<b>Prevent referrals data review (by characteristic)</b>	Prevent Lead	Annual	Principal; reported to Board if concerns arise
<b>External speaker Prevent vetting records review</b>	Academic Registrar	Annual	Prevent Lead
<b>Annual Prevent policy review</b>	Prevent Lead	Annual (August)	Academic Board
<b>Engagement with West Midlands Police Prevent team</b>	Prevent Lead	At least annually	Prevent Lead records; reported to Board as relevant
<b>Board Prevent briefing</b>	Prevent Lead / Principal	Annual	Academic Board

The Academic Board has ultimate responsibility for ensuring EDA College complies with the Prevent duty. The Board receives an annual Prevent briefing and approves the annual Prevent Risk Assessment and Action Plan. Significant Prevent incidents are reported to the Board as soon as practicable after they occur.

## Appendix A: Signs of Radicalisation — Awareness Guidance for Staff

This appendix provides more detailed guidance for staff on identifying possible signs of radicalisation. It should be read in conjunction with Section 9 of this policy and with the WRAP training materials.

**IMPORTANT CAUTION:** No single indicator in this appendix should be treated as proof of radicalisation. Many of these behaviours have entirely innocent explanations. Your role as a member of staff is to notice and report — not to investigate or draw conclusions. Always refer concerns to the Prevent Lead rather than acting independently.

### Understanding the Radicalisation Process

Radicalisation rarely happens overnight. It is typically a gradual process involving a combination of:

- Personal grievance or trauma — real or perceived injustice, humiliation, loss or marginalisation
- Ideological influence — exposure to extremist narratives that provide an explanation for grievances and a call to action
- Social network — connection to a peer group, online community or individual that reinforces extremist views and provides belonging
- Enabling opportunity — access to training, weapons, finance or operational knowledge

### Contextual Factors That May Increase Vulnerability

Factor	Examples
<b>Identity and belonging</b>	Struggling with a sense of identity; feeling caught between cultures; experiencing discrimination or exclusion; searching for a community or sense of purpose
<b>Grievance and injustice</b>	Strong sense of personal, community or political grievance; feeling that legitimate channels of redress have failed; belief that injustice toward a group justifies a violent response
<b>Mental health</b>	Significant mental health difficulties, including depression, anxiety, paranoia or personality disorders, that may increase susceptibility to manipulation
<b>Social isolation</b>	Withdrawal from family, existing friends or mainstream social networks; reliance on a narrow online community for social connection
<b>Personal crisis</b>	Bereavement, relationship breakdown, job loss, academic failure or other significant personal trauma that leaves an individual in a fragile and receptive state
<b>Online influence</b>	Heavy online engagement, particularly with platforms and content associated with extremist movements; exposure to highly radicalised peers online
<b>Conflict-affected background</b>	Personal or family connection to areas of conflict or humanitarian crisis, particularly where there is unresolved trauma or a narrative of victimhood

### Behavioural Indicators — Detailed Guidance

The following are more detailed indicators that — in combination with contextual vulnerability factors and other behaviours — may warrant a Prevent referral. They are organised by type:

#### Changes in Social Behaviour

- Sudden withdrawal from established friendships; new and intense social connections of unknown origin
- Expressing hostility toward former friends or community members who do not share new views
- Adoption of new dress, appearance or language associated with a specific ideological movement
- References to a 'new community' or 'brothers/sisters' in ways that suggest group membership rather than mainstream social connection

#### Expression of Views

- Expressing the view that violence is justified to achieve political, religious or ideological goals
- Defending or justifying the actions of terrorist groups or individuals

- Expressing the view that a particular group of people (defined by religion, race, nationality or other characteristic) are subhuman or deserving of harm
- Expressing hopelessness about peaceful solutions and enthusiasm for violent alternatives
- Describing dying for a cause as desirable, honourable or inevitable

### **Online Activity**

- Sharing or posting extremist material on social media or in College online spaces
- References to specific extremist groups, ideologies or individuals in academic work or informal conversation
- Spending significant time on encrypted or anonymous platforms in ways that are unexplained and secretive
- Seeking out or celebrating violent extremist content online

### **Academic Work**

- Producing assessed or non-assessed work that glorifies, justifies or promotes violence or extremism
- Expressing extreme and unqualified views in academic writing that go beyond critique or controversial opinion into endorsement of violence
- Displaying unusual interest in topics related to weapons, attacks, martyrdom or violent campaigns without academic justification

### **Common Pitfalls to Avoid**

DO NOT assume radicalisation based on: practising a particular religion or wearing religious dress; discussing or expressing views on geopolitical conflicts, even strongly; holding conservative religious or political views; being a first or second-generation immigrant; or expressing anger about discrimination or injustice. These are all lawful activities that have nothing to do with terrorism.

## Appendix B: Prevent Referral Form

Complete this form and submit it to the Prevent Lead (Principal) within 24 hours of making a verbal referral. This form is strictly confidential. Do not share it with the individual concerned or with other staff without the Prevent Lead's authorisation.

SECTION A: YOUR DETAILS	
Your name	
Your role at EDA College	
Date of verbal referral to Prevent Lead	
Date of this written referral form	
SECTION B: INDIVIDUAL OF CONCERN	
Name of individual (if known)	
Student ID / staff ID (if applicable)	
Programme / role	
Age (approximate if not known)	
Any relevant background information	
SECTION C: NATURE OF CONCERN	
Please describe in detail the specific behaviour(s), statement(s) or information that have given rise to your concern. Include dates, times, locations and any witnesses.	
What type of extremism or radicalisation are you concerned about?  How long have you been concerned about this individual?	<input type="checkbox"/> Far-right / white nationalist <input type="checkbox"/> Islamist extremism <input type="checkbox"/> Far-left extremism <input type="checkbox"/> Incel / misogynist extremism <input type="checkbox"/> Other (please describe):
Have you noticed any other relevant changes in behaviour?	
Is there any immediate risk to the safety of the individual or others?	Yes / No — If YES, have you called 999? Yes / No
SECTION D: INFORMATION SOURCES	
How did you come to have this concern? (Direct observation / information from third party / other)	
Are there other people who share your concern or who have relevant information?	

**Is there any physical or digital evidence relevant to this concern?**

**SECTION E: DECLARATION**

**I confirm that:**

The information in this form is accurate to the best of my knowledge. I have not disclosed this concern to the individual concerned or to colleagues other than the Prevent Lead. I understand that this form is strictly confidential.

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

**FOR PREVENT LEAD USE ONLY**

**Date received**

**Initial assessment**

**Action taken**

No further action  Monitoring  Channel referral  Police referral  Other

**Date of action**

**Outcome**

**Prevent Lead signature**

## Appendix C: Channel Referral Process

This appendix sets out the process for referring an individual to the Birmingham Channel panel, for the guidance of the Prevent Lead.

Stage	Action	Notes
<b>1. Assess</b>	The Prevent Lead reviews the referral form and assesses whether the individual is at risk of being drawn into terrorism. Consider: Is there a genuine Prevent concern? Is the behaviour related to a possible terrorist ideology? Is the person vulnerable?	Consider seeking informal advice from the local police Prevent team before making a formal referral.
<b>2. Seek consent</b>	Where the individual is an adult (18+), the Prevent Lead normally seeks their consent to the referral. Explain that Channel is a voluntary programme designed to provide support, not to criminalise.	Consent is not required where seeking it would undermine the referral or endanger others. Document the consent decision and the reasons.
<b>3. Make referral</b>	The Prevent Lead contacts the Birmingham Channel panel (via West Midlands Police or the local authority Prevent coordinator) and submits the referral. The referral should include: individual's details (name, age, address if available); nature of concern; relevant background; information about vulnerability factors.	Channel referrals are made by the Prevent Lead only. Do not refer directly to Channel without the Prevent Lead's authorisation.
<b>4. Channel assessment</b>	The Channel panel will assess the referral and determine whether the individual meets the threshold for Channel. The panel may request additional information from EDA College.	Provide information requested by the panel in a timely manner. Maintain confidentiality throughout.
<b>5. Support plan</b>	If the individual is accepted into Channel, the panel will develop a support plan. EDA College may be asked to contribute to the support plan (e.g. through mentoring, pastoral support or academic adjustments).	Implement support plan elements within EDA College's capacity and in accordance with the individual's best interests.
<b>6. Review</b>	Channel panels review cases regularly. The Prevent Lead should maintain contact with the panel and provide updates on the individual's engagement with College life.	Continue to provide pastoral support to the individual throughout the Channel process.
<b>7. Closure</b>	When Channel engagement concludes, the Prevent Lead is notified. EDA College will continue to provide appropriate ongoing support.	Document the closure and ensure the individual receives continued pastoral support as appropriate.

Channel contacts for West Midlands:

Contact	Details
<b>West Midlands Police Prevent Team</b>	Via West Midlands Police main switchboard or the Prevent duty advice line: 0800 789 321 (24 hours)
<b>Birmingham City Council Prevent Coordinator</b>	Via Birmingham City Council main switchboard or the local authority Prevent coordinator
<b>National Channel Referral Guidance</b>	Available at: <a href="http://www.gov.uk/government/publications/channel-duty-guidance-protecting-vulnerable-people-from-being-drawn-into-terrorism">www.gov.uk/government/publications/channel-duty-guidance-protecting-vulnerable-people-from-being-drawn-into-terrorism</a>

## Appendix D: Key Contacts and Useful Resources

### Emergency and Immediate Threat Contacts

Contact	Details	When to Use
Emergency services	999	Immediate terrorist threat; imminent danger to life
Anti-Terrorist Hotline	0800 789 321 (24 hours, free)	Non-emergency terrorism concerns; information about suspicious activity
Online terrorism reporting	<a href="http://www.gov.uk/report-terrorism">www.gov.uk/report-terrorism</a>	Reporting extremist online content
Text emergency (for deaf/speech impaired)	18000	Emergency where voice call is not possible

### Prevent and Channel Contacts

Contact	Details
EDA College Prevent Lead	Principal — contact via College main office
EDA College Deputy Prevent Lead	Academic Registrar — contact via College main office
West Midlands Police Counter Terrorism Unit	Via West Midlands Police switchboard; Prevent duty advice line: 0800 789 321
Birmingham Channel Panel	Via West Midlands Police Prevent team or Birmingham City Council
Home Office Prevent Team	<a href="http://www.gov.uk/government/organisations/home-office">www.gov.uk/government/organisations/home-office</a>
OfS (regulatory matters)	<a href="http://www.officeforstudents.org.uk">www.officeforstudents.org.uk</a>

### Training and Resources

Resource	Details
WRAP e-learning (Home Office)	Available via the Home Office Prevent e-learning portal; free to all staff
Prevent duty guidance for HE	<a href="http://www.gov.uk/government/publications/prevent-duty-guidance">www.gov.uk/government/publications/prevent-duty-guidance</a>
Channel duty guidance	<a href="http://www.gov.uk/government/publications/channel-duty-guidance-protecting-vulnerable-people-from-being-drawn-into-terrorism">www.gov.uk/government/publications/channel-duty-guidance-protecting-vulnerable-people-from-being-drawn-into-terrorism</a>
ACT Awareness e-learning (counter-terrorism awareness)	<a href="http://www.gov.uk/ACT-awareness-e-learning">www.gov.uk/ACT-awareness-e-learning</a> — free; designed for the public, useful for staff
Educate Against Hate (government resource for educators)	<a href="http://www.educateagainsthate.com">www.educateagainsthate.com</a> — practical tools and guidance for education providers
NASUWT / Advance HE Prevent guidance	Available from respective organisations' websites

Approved by the Academic Board of EDA College | August 2025

*This policy is reviewed annually. The current version is always available on the College website.*

*Educate. Develop. Achieve.*