

## Prevent Duty Policy & Procedure 2026-27

### Document control

This is Version 3.0. It replaces the 2022-23 policy, approved on 22 April 2024. It is updated to the Prevent duty guidance (2023), the Key Principles of Prevent (February 2026), the DfE's September 2026 practical guidance for DSLs, and KCSIE 2026.

| Version       | Date          | Author               | Authorised by                                  | Next review    |
|---------------|---------------|----------------------|------------------------------------------------|----------------|
| 3.0           | October 2026  | Zak Vesamia (DSL)    | Board of Governors — approval date to be added | September 2027 |
| 2.0 (2022-23) | 22 April 2024 | Vanessa Pinzon (DSL) | Ahmed Khan, Managing Director                  | —              |

The policy is reviewed every year, and sooner if the law, statutory guidance or local Prevent arrangements change, or after a Prevent referral raises lessons for NST.

## 1. Purpose, scope and policy statement

NextStep Training Limited (NST) treats Prevent as part of everyday safeguarding. Our aim is to protect apprentices and staff from being drawn into terrorism, and to support anyone who is susceptible to radicalisation early, before any crime takes place.

### Policy statement

Prevent is one of the four strands of CONTEST, the government's counter-terrorism strategy. As an independent training provider funded to deliver apprenticeships, NST must have "due regard to the need to prevent people from being drawn into terrorism" (section 26, Counter-Terrorism and Security Act 2015). Complying with the duty is also a condition of our funding.

The threat from terrorism in the UK is real and can involve the exploitation of people who are young, isolated or otherwise susceptible. NST is based in Hackney, a Prevent priority area. Most of our apprentices are adults and some have children of their own, so we also give apprentices advice on protecting their families from radicalisation.

Prevent is about safeguarding, not surveillance. It never targets any faith, ethnic or community group. It sits alongside our commitment to free speech and lawful debate.

### Purpose

This policy:

- sets out how NST meets the Prevent duty
- explains how to recognise and report concerns, and how NST works with Hackney's Prevent team, the police and Channel
- sets out how we build apprentices' resilience through teaching, British values and online safety

### Scope

This policy applies to all staff, the Managing Director, contractors, volunteers, visiting speakers and apprentices, wherever learning takes place: at our office, in apprentices' workplaces or online.

Read it alongside NST's Safeguarding & Child Protection Policy 2026-27, Internet, Email and Social Media Policy, External Speakers procedure, and Equality, Diversity and Inclusion Policy.

## 2. Legal framework and current guidance

NST follows:

- Counter-Terrorism and Security Act 2015, Part 5 (the Prevent duty and Channel)
- Terrorism Act 2000 and Terrorism Act 2006
- Prevent duty guidance: England and Wales (2023), in force since 31 December 2023, including its section on further education providers
- Channel duty guidance (an update is expected in autumn 2026)
- Key Principles of Prevent (February 2026), which confirm that a person does not need a clear ideology to be referred

- The Prevent duty: safeguarding learners susceptible to radicalisation — DfE practical guidance for DSLs (September 2026)
- Keeping Children Safe in Education 2026 and Working Together to Safeguard Children 2026
- Equality Act 2010, including the public sector equality duty where relevant
- UK GDPR and Data Protection Act 2018, as amended by the Data (Use and Access) Act 2025
- Ofsted's further education and skills inspection framework and toolkit

The government is changing Prevent after the Southport Inquiry, including a practitioner portal and updated Channel and Key Principles guidance due in late 2026. The DSL will update this policy when they are published.

### 3. Definitions and the current threat picture

| Term           | Meaning                                                                                                                                                                                                                                                                                                                              |
|----------------|--------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| Prevent        | The strand of CONTEST that aims to stop people becoming terrorists or supporting terrorism. Its three objectives (2023) are to tackle the ideological causes of terrorism, intervene early to support people susceptible to radicalisation, and enable people who have already engaged in terrorism to disengage and rehabilitate.   |
| CONTEST        | The UK counter-terrorism strategy: Prevent, Pursue (stop attacks), Protect (strengthen protection) and Prepare (reduce the impact of an attack).                                                                                                                                                                                     |
| Terrorism      | The use or threat of serious violence against a person, or serious damage to property, designed to influence a government or intimidate the public, to advance a political, religious, racial or ideological cause (Terrorism Act 2000).                                                                                             |
| Radicalisation | The process of a person legitimising support for, or use of, terrorist violence.                                                                                                                                                                                                                                                     |
| Extremism      | The promotion or advancement of an ideology based on violence, hatred or intolerance that aims to destroy others' fundamental rights and freedoms; undermine or overthrow the UK's parliamentary democracy and democratic rights; or intentionally create an environment where others can do so (government definition, March 2024). |
| Susceptibility | Being likely to be influenced or harmed by terrorist or extremist ideologies. It is specific to each person and may be linked to vulnerability, but not everyone who is susceptible is vulnerable.                                                                                                                                   |
| Channel        | A voluntary, confidential, multi-agency programme that supports people assessed as susceptible to being drawn into terrorism.                                                                                                                                                                                                        |
| British values | Democracy, the rule of law, individual liberty, and mutual respect and tolerance of those with different faiths and beliefs, and those without faith.                                                                                                                                                                                |

## Ideologies of concern

The greatest threats in the UK come from Islamist and extreme right-wing terrorism. Staff should also be alert to:

- mixed, unclear or unstable ideologies, where people take ideas from several sources
- fixation on violence, school massacres or mass-casualty attacks, including an interest in weapons or explosives
- extreme misogyny, including "incel" ideology
- antisemitic, anti-Muslim and other hate-based narratives
- conspiracy theories, misinformation and disinformation that can lead to violence

The Key Principles of Prevent (February 2026) confirm that **a clear ideology is not required** to make a Prevent referral. Concerns about someone who is fixated on violence without a clear cause must still be reported.

Young people make up a growing share of Prevent referrals and terrorism arrests. Most are radicalised online, often quickly and through social media, gaming platforms and closed messaging groups.

## 4. Roles and responsibilities

Prevent is everyone's responsibility at NST. The DSL is NST's Prevent lead.

| Role                                          | Name                  | Responsibilities                                                                                                                                                                                                                                                                                      |
|-----------------------------------------------|-----------------------|-------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| Board of Governors                            | Chair of the Board    | Approves this policy; receives termly Prevent reports; handles concerns about the Managing Director                                                                                                                                                                                                   |
| Managing Director                             | Ahmed Khan            | Overall accountability for the Prevent duty; approves the Prevent risk assessment; makes sure the policy is on the shared drive, in the policy file and on NST's website; consulted on every referral                                                                                                 |
| Designated Safeguarding Lead and Prevent lead | Zak Vesamia           | Leads referrals; keeps up to date with Prevent and Channel guidance and briefs managers; owns the risk assessment and action plan; makes sure all staff complete training; attends Channel panels when invited; advises staff and apprentices, including apprentices worried about their own children |
| Deputy DSL                                    | Anna Kirpichnikova    | Covers all DSL duties when the DSL is absent                                                                                                                                                                                                                                                          |
| Safeguarding Officer                          | Laura Stephens Nields | Monitors the shared safeguarding mailbox with the DSL and Deputy DSL; supports the DSL with records, training and follow-up                                                                                                                                                                           |

| Role                           | Name       | Responsibilities                                                                                                                  |
|--------------------------------|------------|-----------------------------------------------------------------------------------------------------------------------------------|
| Safer Recruitment Lead         | Ahmed Khan | Makes sure recruitment and checks on staff, volunteers and external speakers follow the Safer Recruitment Policy                  |
| Programme Manager and IQA team | —          | Check, through observations, reviews and IQA, that tutors promote British values and Prevent awareness in teaching and assessment |
| Assessor/Tutors                | —          | Build British values and online safety into sessions and progress reviews; know their apprentices; report concerns the same day   |
| All staff                      | —          | Follow this policy; complete Prevent training; report any concern to the DSL immediately                                          |

When the DSL is away, the Deputy DSL takes on the role. If both are absent, a trained member of the senior leadership team covers, as named on the staff noticeboard and in the weekly bulletin. Concerns can always be sent to the shared safeguarding mailbox, which the DSL, Deputy DSL and Safeguarding Officer all monitor during working hours.

## Contacts

| Contact                                                    | Telephone                                        | Email / web                                               |
|------------------------------------------------------------|--------------------------------------------------|-----------------------------------------------------------|
| NST DSL (Zak Vesamia)                                      | 020 7247 5497 ·<br>out of hours<br>07553 071 775 | zak@nextsteptrainingltd.co.uk                             |
| NST Deputy DSL (Anna Kirpichnikova)                        | 020 7247 5497                                    | anna@nextsteptrainingltd.co.uk                            |
| NST Safeguarding Officer (Laura Stephens Nields)           | 020 7247 5497                                    | laura@nextsteptrainingltd.co.uk                           |
| NST shared safeguarding mailbox                            | —                                                | [shared mailbox address to be confirmed]                  |
| Hackney Prevent Team                                       | 020 8356 8104                                    | prevent@hackney.gov.uk                                    |
| Met Police SO15 Prevent (North East)                       | 020 7275 4652                                    | SO15Mailbox-<br>.LocalOpsNorthEastTeam3@me<br>t.police.uk |
| Hackney MASH (children's social care), Mon–<br>Fri 9am–5pm | 020 8356 5500                                    | MASH@hackney.gov.uk                                       |
| Hackney Emergency Duty Team (out of<br>hours)              | 020 8356 2710                                    | —                                                         |
| Hackney LADO (concerns about staff)                        | 020 8356 4569                                    | lado@hackney.gov.uk                                       |

| Contact                                     | Telephone     | Email / web                                                                              |
|---------------------------------------------|---------------|------------------------------------------------------------------------------------------|
| Anti-Terrorist Hotline                      | 0800 789 321  | <a href="https://gov.uk/report-terrorism">gov.uk/report-terrorism</a> (online reporting) |
| ACT Early (advice for families and friends) | 0800 011 3764 | <a href="https://actearly.uk">actearly.uk</a>                                            |
| Police — emergency / non-emergency          | 999 / 101     | —                                                                                        |

NST address: Unit A2, Ment House, 1B Mentmore Terrace, London E8 3DQ. Contacts are checked every term, in line with the Safeguarding & Child Protection Policy.

## 5. Risk assessment and action plan

NST keeps a written Prevent risk assessment and action plan, owned by the DSL and approved by the Managing Director. It is reviewed every year and after any significant incident or change in local risk.

The risk assessment covers:

- leadership and partnership: links with Hackney's Prevent team, the DfE regional Prevent coordinator and employers
- staff training and awareness
- welfare and pastoral support, including apprentices who are under 18, care-experienced, isolated or have special educational needs
- teaching, British values and the curriculum
- IT, filtering and monitoring
- external speakers, events and use of premises
- local and online risks, including those in apprentices' workplaces and sectors

NST uses the DfE's Prevent duty self-assessment tool for further education to check its arrangements, and acts on gaps. Staff and apprentices are told about relevant findings and changes.

## 6. Recognising susceptibility to radicalisation

There is no typical profile of someone being radicalised. The signs below are not a checklist: any, all or none may be present, and having them does not mean someone is being radicalised. Staff should trust their professional judgement and report what worries them.

### Factors that may increase susceptibility

- **Identity and belonging:** questions about identity, faith or belonging; feeling uncomfortable with their place in society; distance from family or cultural heritage
- **Personal crisis:** family tensions, bereavement, isolation, low self-esteem, leaving old friends for a new group
- **Grievance and injustice:** a sense of grievance triggered by racism, discrimination or events in the UK or overseas; feelings of failure or rejection
- **Circumstances:** migration, uncertain immigration status, community tensions, disadvantage or exclusion
- **Criminality:** past involvement with criminal groups, time in custody, or poor resettlement

- **Mental health and neurodivergence:** these do not cause radicalisation, but may make someone easier to exploit, and should be considered alongside other needs
- **Online exposure:** heavy time spent in closed online groups, forums or gaming communities with extremist content

### Behaviours of concern

- expressing support for terrorist attacks, extremist groups or leaders
- justifying violence to solve social or political problems
- contact with extremist recruiters, or joining extremist groups
- accessing, possessing or sharing extremist material, including online
- fixation on violence, mass killings, weapons or explosives
- hateful language about a group, including antisemitic, anti-Muslim, racist or misogynistic remarks
- sudden changes in behaviour, appearance, friendships or routine
- extended travel to areas linked with terrorism or conflict, or use of false identity documents

Where several factors appear together, or behaviour escalates, the concern is more urgent.

## 7. Referral procedure and Channel

Report any Prevent concern to the DSL immediately, and no later than the end of the working day. Do not wait for proof, and do not investigate yourself.

### Steps to follow

1. **Immediate risk to life or of an attack:** call **999**, then tell the DSL. For urgent information about terrorism, call the Anti-Terrorist Hotline on 0800 789 321.
2. **All other concerns:** tell the DSL or Deputy DSL in person or by phone, or email the shared safeguarding mailbox. If the DSL team cannot be reached, contact Hackney's Prevent team directly and tell the DSL as soon as possible. Record what you saw or heard, in the person's own words, with dates and times, on the Safeguarding Report Form (Appendix C of the Safeguarding & Child Protection Policy).
3. **DSL assessment:** the DSL gathers relevant information, talks to the staff member and, where safe, to the apprentice. For apprentices under 18, the DSL considers speaking to parents or carers unless this would increase the risk. The DSL may seek advice from Hackney's Prevent team or the Met Police Prevent team.
4. **Referral:** where there is a Prevent concern, the DSL completes the **Prevent National Referral Form**, including any social media handles, and sends it to the police Prevent team, consulting the Managing Director. Consent is not needed to make a referral. A clear ideology is not needed either.
5. **Other safeguarding needs:** where the person is also at risk of other harm, such as abuse or exploitation, the DSL also refers to Hackney MASH or adult social care.
6. **Records:** the DSL records every concern, decision and reason, including decisions not to refer, and stores them securely and separately from apprentice files.
7. **Follow-up:** the DSL keeps supporting the apprentice whatever the outcome, and tells the staff member who raised the concern what they need to know.

## What happens after a referral

- The police assess the referral and may gather more information. If it meets the threshold, it goes to a **Channel panel**, chaired by the local authority.
- Channel is voluntary and confidential. Adults must consent; for under-18s, parents or carers are usually involved. Support may include mentoring, education, health or careers support.
- Referrals that do not meet the Channel threshold may be passed to other services. The DSL continues to support the apprentice and re-refers if concerns return or grow.
- The DSL attends Channel meetings when invited and shares relevant information.

## Concerns about staff

If a concern involves a member of staff, contractor or volunteer, report it to the DSL or Managing Director; if it concerns the Managing Director, report it to the Chair of the Board of Governors. It is handled under both this policy and the allegations section of the Safeguarding & Child Protection Policy, including a referral to the LADO where appropriate.

## 8. Training, curriculum and British values

### Staff training

| Who                                        | Training                                                                                       | When                                              |
|--------------------------------------------|------------------------------------------------------------------------------------------------|---------------------------------------------------|
| All staff, including the Managing Director | Home Office Prevent awareness e-learning and Prevent referrals module                          | Within 2 weeks of starting; refresh every 2 years |
| All staff                                  | Prevent update covering local risks, new guidance and case learning                            | At least once a year                              |
| DSL and Deputy DSL                         | Prevent and Channel awareness, DfE practical guidance for DSLs, local Hackney Prevent training | Every 2 years, with annual updates                |
| Programme Manager and IQA team             | Embedding British values and Prevent in teaching and assessment                                | Every year                                        |

The DSL keeps a record of completion and follows up anyone who is overdue.

### Apprentices

- All apprentices complete Prevent and British values awareness at induction, using the Education and Training Foundation's free learner modules.
- Prevent, online safety and British values are discussed at every progress review.
- Apprentices learn how to raise concerns about themselves, a friend, a colleague or a family member.

## Embedding British values in learning

Tutors use planned and unplanned opportunities to:

- link democracy and the rule of law to vocational topics such as health and safety law and employment law
- set ground rules for sessions based on tolerance and mutual respect for faiths and beliefs
- discuss individual liberty in relation to careers, rights and responsibilities at work
- teach critical thinking, including how to spot extremist content, misinformation, disinformation and conspiracy theories online
- help apprentices see how mutual respect and tolerance apply in their workplace
- create a safe space to discuss difficult and current issues, while challenging hateful or discriminatory views

NST promotes equality, values diversity and builds community cohesion, so that every apprentice feels they belong.

## 9. Online safety, IT and external speakers

### IT, filtering and monitoring

- NST's networks and devices use filtering and monitoring that meet the DfE's filtering and monitoring standards, including blocking terrorist and extremist content.
- A named senior leader is responsible for filtering and monitoring, supported by the DSL and the IT provider. Their effectiveness is reviewed **at least once every academic year**, and each review is recorded (KCSIE 2026).
- The DSL receives and acts on monitoring alerts about extremist searches or content.
- Staff and apprentices must not use NST systems to access, create or share extremist material. This is a serious disciplinary matter and may be reported to the police.

### Online risks

Staff talk to apprentices about how extremists use social media, gaming platforms, closed groups and AI-generated content to groom and recruit. Apprentices are taught to report extremist content online through the government's [online reporting tool](#).

### External speakers and events

- The member of staff inviting an external speaker completes a risk assessment before the event, checking the speaker's background, content and purpose.
- The DSL approves higher-risk events and may require changes, such as an alternative view being presented or the event being chaired.
- Speakers are supervised by their NST host and must follow NST's values and the law.
- NST does not allow its premises, branding or online platforms to be used to promote extremism.
- A log records each speaker's name, topic, date and the checks completed.

This is balanced with NST's commitment to free speech and lawful debate.

## 10. Employers, partnerships, monitoring and review

### Employers and workplaces

- Employers receive guidance on Prevent and British values at sign-up, with NST's DSL contact details.
- Employers must tell NST's DSL about any Prevent concern involving an apprentice.
- Tutors check during workplace visits that apprentices feel safe and know how to report concerns.

### Working with partners

NST works with Hackney's Prevent team, the Met Police Prevent team, the DfE regional Prevent coordinator for London, Hackney MASH and the City and Hackney Safeguarding Children Partnership. The DSL shares information with these partners where it is necessary and proportionate. Data protection law does not prevent sharing information to keep people safe.

### Ofsted

Ofsted's inspection framework for further education and skills looks at how well NST keeps apprentices safe, including from radicalisation, and how well we prepare them for life in modern Britain. Inspectors expect apprentices to understand the risks of radicalisation and extremism, including online, and to know how to report concerns.

### Monitoring and review

The DSL reports to the Managing Director and the Board of Governors at least termly on:

- the number and outcome of Prevent concerns and referrals
- training completion
- risk assessment and action plan progress
- filtering and monitoring reviews
- external speaker checks

This policy is reviewed every September, or sooner if guidance changes.

## Appendix A — Main changes from the 2022-23 version

- Updated to the Prevent duty guidance (2023). It replaces the 2015 and 2011 references, the old Prevent objectives and the 2011 extremism definition.
- Updated language from "vulnerable" to "susceptible", in line with the 2023 guidance.
- Added the March 2024 government definition of extremism, and newer ideologies of concern: mixed or unclear ideologies, violence fixation, misogyny and antisemitism.
- Added that a clear ideology is not needed to make a referral (Key Principles of Prevent, February 2026).
- Set out a full referral procedure using the Prevent National Referral Form, with Channel and the contacts table. Previously this was a single paragraph.
- Removed the October 2018 Ofsted handbook extract, which has been superseded.
- Removed the outdated [preventforfeandtraining.org.uk](http://preventforfeandtraining.org.uk) link and the references to SFA funding.

- Updated the named roles: Zak Vesamia replaces Vanessa Pinzon as DSL.
- Added training, IT filtering and monitoring, external speakers, employer and review sections.
- Linked to the Safeguarding & Child Protection Policy 2026-27.

## Sources

- [Prevent duty guidance: England and Wales \(2023\)](#) — Home Office
- [Prevent duty guidance: glossary of terms](#) — Home Office
- [The Prevent duty: safeguarding learners susceptible to radicalisation](#) — DfE, updated October 2026
- [Government response to phase 1 of the Southport Inquiry](#) — July 2026
- [Further education and skills inspection toolkit](#) — Ofsted
- [KCSIE 2026: a practical guide](#) — Farrer & Co