

ITALIA CONTI

Extremism and Anti-Radicalisation Policy

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Prepared by:	Head of Quality Assurance
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1. Introduction

Italia Conti is an inclusive organisation which provides a safe environment for students to learn and achieve. As part of these principles, safeguarding is a top priority so that students can develop without fear of danger or abuse. Italia Conti is fully committed to supporting its learners and other stakeholders (including parents/carers or outside agencies) in minimising the dangers of radicalisation.

2. Aims and Objectives

- This policy supports the Prevent Duty for schools and colleges as part of the Counter Terrorism and Security Act (2015), Counter Terrorism Strategy (CONTEST) 2018, UK Government Prevent Strategy 2011 and Prevent Duty Guidance 2019. This policy incorporates the 2023 Prevent duty updates¹, and forms part of our overall *Safeguarding Policy*;
- This policy supports and complements the 'British Values' set out in the Department of Education guidance: 'Promoting Fundamental British Values as part of Spiritual, Moral, Social, and Cultural (SMSC) in Schools' and accompanies other related safeguarding documents including our Internet Safety and Equality policies;
- This policy aims to reduce the possibility of a permissive environment in order to tackle the ideological causes of terrorism.

3. Key Principles

All teachers, non-teaching staff and Board members:

- are made aware of what type of behaviour constitutes extremist behaviour (through appropriate and proportionate staff training) and are expected to be vigilant;
- understand the importance of promoting British values as part of the ethos of Italia Conti and will listen to the student about fears or concerns that they may have in light of any terrorist event;
- receive training on Prevent and understand the signs related to radicalisation. In addition, they know the procedures in any disclosures or concerns about a student or member of the Italia Conti community.
- should be aware that Italia Conti has a zero tolerance of any member of the institution engaged in extremist behaviour.
- are committed to safeguarding and are fully aware of the dangers of the radicalisation of students.

¹ GOV.UK. "Prevent Duty Guidance." Available at: https://assets.publishing.service.gov.uk/media/65e84b6008eef600115a5679/14.258_HO_Prevent+Duty+Guidance_v5d_Final_Print.pdf [Accessed 6/1/2025].

- are committed to promoting an inclusive curriculum that allows for different views to be heard, and for differences between learners and learning communities to be celebrated. (This includes the provision of visiting guest speaker protocols and IT policies to reduce learners' exposure to radicalising influences).

The Designated Safeguarding Lead (DSL) or Prevent Lead will receive:

- in-depth training² (including on extremist and terrorist ideologies) to enable them to train and advise other staff and support making informed referrals to Prevent (where necessary).

4. Prevent

Section 21 of the Counterterrorism and Security Act 2015 (the Act) places a duty on certain bodies, listed in Schedule 3 to the Act, to have “due regard to the need to prevent people from being drawn into terrorism”. The Act states that the authorities subject to the provisions must have regard to this guidance when carrying out the duty. Since 1st July 2015, schools and colleges have a duty to safeguard students and children from radicalisation under the Terrorism and Security Act (2015).

The current threat from Terrorism and Extremism in the United Kingdom is real and severe and can involve the exploitation of vulnerable people, including children and young people. This policy is designed to provide a clear framework to structure and inform our response to safeguarding concerns for those young people who may be vulnerable to the messages of extremism. In addition, it provides details of the local interagency process and expectations in identifying appropriate interventions based on the threshold of need and intervention model and the Channel process.

Prevent is one of the four elements of CONTEST, the government's counter-terrorism strategy. It aims to stop people becoming terrorists or supporting terrorism. The Home Office works with local authorities and a wide range of government departments, and community organisations to deliver the Prevent Strategy. The guidance only applies to non-violent extremism where it can be reasonably linked to terrorism or could draw people into terrorism.

There are four strands to the strategy:

- Prevent – To stop people becoming terrorists or supporting terrorism;
- Pursue – to stop terrorist attacks;
- Protect – to strengthen our protection against a terrorist attack;
- Prepare – to mitigate the impact of terrorist attacks.

The Prevent Strategy:

² Support for designated Prevent responsibilities is available at: GOV.UK. “Support for People Susceptible to Radicalisation.” Available at: <https://www.support-people-susceptible-to-radicalisation.service.gov.uk/> [Accessed 6/1/2025]

- aims to tackle the ideological causes of terrorism;
- responds to the ideological challenge we face from terrorism and aspects of extremism, and the threat we face from those who promote these views;
- provides practical help to prevent individuals from being drawn into terrorism and ensure they are given appropriate advice and support;
- works with a wide range of institutions (including education, criminal justice, faith, charities, online and health) where there are risks of radicalisation that we need to deal with;
- the strategy covers all forms of terrorism, including far right extremism and some aspects of non-violent extremism.
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Further information about the CONTEST strategy can be found here:

<https://www.gov.uk/government/publications/counter-terrorism-strategy-contest-2018>

5. Channel and Prevent Multi-Agency Panel (PMAO)

Channel is a key element of the Prevent Strategy. It is a multi-agency approach which focuses on providing support at an early stage to people who are identified as being vulnerable to being drawn into terrorism.

Channel uses existing collaboration between local authorities, statutory partners (such as the education and health sectors, social services, children's and youth services and offender management services), the police and the local community to:

- **identify** individuals at risk of being drawn into terrorism;
- **assess** the nature and extent of that risk; and
- **develop** the most appropriate support plan for the individuals concerned.

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.

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 also 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.

Further information about the Channel Programme can be found here:

https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/964567/6.6271_HO_HMG_Channel_Duty_Guidance_v14_Web.pdf

6. Tackling Extremism

Italia Conti is a tolerant and safe environment for learners to develop and achieve. Staff have training in the procedures in place for reporting concerning behaviour.

In addition, a risk assessment³ will be undertaken by the Designated Safeguarding Lead or staff member with Prevent responsibilities. This should assess how our learners or staff may be at risk of being radicalised into terrorism, including online. Where specific risks are identified, an action plan will be developed to set out the steps that Italia Conti will take to mitigate the risk. The risk assessment will accurately reflect and account for local risk and threat and will be proportionate based on Italia Contis' setting size and provision.

7. Evidence of Extremism

In 2024, the UK government's definition of extremism was updated and is now defined as

"The promotion or advancement of an ideology based on violence, hatred or intolerance, that aims to:

1. negate or destroy the fundamental rights and freedom of others; or
2. undermine, overturn or replace the UK's system of liberal parliamentary democracy and democratic rights; or
intentionally create a permissive environment for others to achieve the results in (1) or (2).

<https://www.gov.uk/government/publications/new-definition-of-extremism-2024/new-definition-of-extremism-2024>

Context: Behaviour that could constitute Extremism

Further information and context to support this definition and the types of behaviour that are indicative of the kind of promotion or advancement which may be relevant to the definition, and are an important guide to its application, can be found in the appendix [here](#) and in the UK government's 2024 guidance on the definition of extremism.

Further context also states that: "The lawful exercise of a person's rights (including freedom of thought, conscience and religion, freedom of expression, freedom of association, or the right to engage in lawful debate, protest or campaign for a change in the law) is not extremism. Simply holding a belief, regardless of its substance, is rightly protected under law. However, the advancement of extremist ideologies and the social harms they create are of concern, and government must seek to limit their reach, whilst protecting the space for free expression and debate."

<https://www.gov.uk/government/publications/new-definition-of-extremism-2024/new-definition-of-extremism-2024>

³ GOV.UK. "Prevent Duty Guidance." Paragraph 162, Available at: https://assets.publishing.service.gov.uk/media/65e84b6008eef600115a5679/14.258_HO_Prevent+Duty+Guidance_v5d_Final_Print.pdf [Accessed 6/1/2025]

Terrorist groups very often draw on extremist ideas developed by extremist organisations.

The Prevent Strategy defines radicalisation as “the process by which a person comes to support terrorism and extremist ideologies associated with terrorist groups.”⁴

Evidence of extremist behaviour may take the following form:

- disclosure by students about extremist or radicalised behaviour. This could be in the form of exposure to materials outside of Italia Conti;
- 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 particular extremist views;
- evidence of accessing online materials (including social media sites) that include extremist materials;
- refusal to accept views expressed by others which are counter to the Italia Conti’s equality policy, unwillingness, or inability to discuss their views;
- concerns raised by parents or carers or others about the changing behaviour of their child student;
- references to an extremist narrative in a learner’s work;
- isolating themselves from family and friends;
- talking as if from a scripted speech;
- a sudden disrespectful attitude towards others or increased levels of anger;
- increased secretiveness, especially around internet use.

Young adults who are at risk of radicalisation may show signs of low self-esteem or be victims of bullying or discrimination. Extremists might target them and tell them they can be part of something special, which may lead to signs of young people disengaging with family, friends, and peers. These signs do not necessarily mean a young person is being radicalised – it may be normal teenage behaviour, or a sign that something else is wrong.

8. Making a Judgement

When making a judgment, staff will ask themselves the following questions:

- does the student have access to extremist influences through the internet e.g., via closed network groups or through liaison with organisations or members of the community?

⁴ GOV.UK. “The Prevent Duty: An Introduction for Those with Safeguarding Responsibilities.” Available at: <https://www.gov.uk/government/publications/the-prevent-duty-safeguarding-learners-vulnerable-to-radicalisation/the-prevent-duty-an-introduction-for-those-with-safeguarding-responsibilities>. [Accessed 6/1/2025]

- does the student possess or actively seek extremist literature/other media likely to incite racial or religious hatred?
- does the student sympathize or support extremist groups or behaviour in their vocal support for terrorist attacks or in their written work?
- does the student's outward appearance suggest a new social, religious, or political influence e.g., jewellery, tattoo, clothing?
- has the student been a victim of a race hate or religious crime?
- has the student had major disagreements with peers, family or faith groups which has led to rejection, isolation, or exclusion?
- does the student display an irregular and distorted view of religion or politics?
- does the student show a strong objection to specific cultures, races, or religions?
- is the student a foreign national awaiting a decision about deportation or immigration?
- Is there an irregular pattern of travel by the student's family?
- has the student 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?

9. Referrals and reporting

In line with Italia Conti's safeguarding procedures, staff members are fully aware of reporting extremist behaviour. The following system for referrals is as follows:

- any disclosures or concerns of extremist behaviour should be referred to the named Designated Safeguarding Lead (DSL);
- all incidents will be investigated in line with current policies and evidence will be recorded and retained for Italia Conti records;
- where age appropriate, parents/carers will be contacted, and the issue will be discussed with them to investigate whether there are any mitigating home circumstances. A decision will be made at this meeting to look at any further external agency support and whether a referral should be made;
- the DSL will follow up any referrals and the student or young person will be monitored for a period of time to look at whether there has been any change in attitude or behaviour. Parents/carers will be consulted during this period of time;
- if concerns are still expressed, the DSL will contact the local Prevent Co-ordinator;
- where it is deemed that there is a risk to an individual in the context of radicalisation to extremist ideology and causes, the individual should be referred to the Channel programme.

10. Prevent-related serious incident reporting HE

The Office for Students' (OfS) Prevent-related serious incident guidance places formal responsibility on all Relevant Higher Education Bodies (RHEBs) to determine what constitutes a Prevent-related serious incident that needs to be reported, and to report it following the principles set out in the note and the associated reporting requirements.

The OfS expect a provider to report any incidents or developments which:

- have led to the review and substantive revision of Prevent-related policies;
- have caused harm to staff and students or reputational harm;
- could be reasonably perceived as being related to Prevent.

Examples of serious incident reporting include (but are not limited to) **hate crime, arrests and charges, harm** (either reputational harm or harm to staff and students), **failure of Prevent-related policies and processes**, and **near misses**.

Providers are expected to report an actual or suspected Prevent-related incident promptly. OfS guidance states that providers should contact the OfS at the time when a potential serious incident is identified, and no later than five days after the incident occurring or being identified. In the case of 'near misses', this should be as soon as it is deemed that a potential incident would have impacted on Prevent duty implementation had it progressed to its conclusion. The OfS does not require personal data to carry out its function, and personal information is not shared as part of this reporting.

Italia Conti has a process in place for serious incident reporting as part of its implementation of Prevent Strategy.

Further information about Prevent-related serious incident reporting can be found here: <https://www.officeforstudents.org.uk/media/29154421-d3e7-4989-9e53-94413fd013f9/ofs-prevent-related-serious-incident-guidance.pdf>

Further information about Prevent framework for monitoring in HE can be found here:

https://www.officeforstudents.org.uk/media/29ebc57e-1987-4120-b329-a10ba826a9ac/prevent-duty-serious-incident-guidance_update-dec-2021.pdf

<https://www.officeforstudents.org.uk/publications/prevent-duty-framework-for-monitoring-in-higher-education-in-england-2018-19-onwards/>

11. British Values

Italia Conti seeks to promote fundamental British Values wherever it can during the time learners spend with us. For more information, please refer to our separate policy on *Promoting British Values*.

12. IT Services

The statutory guidance makes clear the need for colleges to ensure that learners under the age of 18 are safe from terrorist and extremist material when accessing the Internet on our site(s).

Italia Conti employs IT managers who are committed to safeguarding students and staff when using the Italia Conti network. The IT infrastructure has a filtering solution in place to block inappropriate content and if a breach occurred and access to radicalisation material happened, Italia Conti would follow its e-safety incident management procedure to blacklist the site.

13. Use of External Speakers

Vetting of all external and visiting speakers is in line with Italia Conti safeguarding procedures, and in line with our Academic Freedom and Freedom of Speech Codes of Practice. This includes risk assessments for any speakers whose beliefs might undermine the principles and ethos of the British Values endorsed by Italia Conti.

14. Staff Training

The statutory guidance refers to the importance of Prevent awareness training to equip staff to identify children at risk of being drawn into terrorism and to challenge extremist ideas.

Staff members receive Safeguarding and Child Protection training at least every two years in line with the relevant policies. The topic of anti-radicalisation is also incorporated into e-safety training and updated in line with emerging online behaviours. All staff, including support staff and governors, are required to complete the government Prevent training.

15. Disclosure and Referrals relating to staff and students

- Italia Conti will have a designated Prevent Single Point of Contact (SPOC) with designated responsibility for Prevent referrals/liaison and establish appropriate arrangements to ensure cover for this role. The current SPOC is listed in [Appendix 2](#).
- Where a member of staff has any concerns about a student relating to Prevent, they should, as a matter of urgency, refer the matter to the Italia Conti's designated (SPOC) or, in his/ her absence, a member of the Safeguarding team or the Senior Leadership Team.
- There may be some circumstances where Italia Conti, in the course of Prevent-related work, identifies someone who may already be engaged in illegal terrorist-related activity. People suspected of being involved in such activity should be referred to the police by the Prevent SPOC or her/his delegated alternative.
- Where a referral is made to Prevent in relation to a student, the Senior Leadership Team will be notified.

16. Sharing of personal information

When considering sharing personal information, Italia Conti will take account of the following:

- necessity and proportionality: personal information should only be shared where it is strictly necessary to the intended outcome and proportionate to it. Key to determining the necessity and proportionality of sharing information will be the professional judgement of the risks to an individual or the public.
- consent: wherever possible the consent of the person concerned should be obtained before sharing any information about them.
- power to share: the sharing of data by public sector bodies requires the existence of a power to do so, in addition to satisfying the requirements of the Data Protection Act 2018, General Data Protection Regulation (GDPR) 2018 and the Human Rights Act 1998.
- Data Protection Act and the Common Law Duty of Confidentiality: in engaging with non-public bodies, a body on which the Prevent duty falls should ensure that they are aware of their own responsibilities under the Data Protection Act.

Acting in accordance with these principles, the Prevent SPOC may seek advice regarding a Prevent-related concern (which might include the sharing of personal information), to an external body before determining whether further action should be taken in relation to a concern about an individual or individuals.

17. Prevent Compliance

- Italia Conti fully recognises its role in helping prevent people being drawn into terrorism, which includes not just violent extremism but also non-violent extremism, which can create an atmosphere conducive to terrorism and can popularise views that terrorists exploit.
- Italia Conti understand that radicalisation is usually a process, not an event. During that process, behaviours as well as opinions are likely to change. These changes may be apparent to the friends, families and work colleagues of the person concerned.
- Italia Conti will aim to ensure that their arrangements for the implementation of the Equality Duty balance their responsibilities towards equality with their responsibilities to protect student and staff welfare under the Prevent duty.
- The Prevent work undertaken will be closely aligned with the existing Safeguarding or equivalent procedures.
- Any concerns about a student at risk of radicalisation should be made as a Safeguarding referral where it is appropriate to do so under Italia Conti policies. The Prevent SPOC should be notified about such concerns as a matter of urgency.
- The Italia Conti Prevent SPOC will decide upon whether a referral to an external agency is appropriate. Where appropriate and legal to do so, the Italia Conti Prevent SPOC will share information with other institutions and key partners, such as the local Prevent group.
- Italia Conti will ensure its Safeguarding policy (or equivalent) is aligned with the Prevent duty and will ensure that it abides by any locally agreed inter-agency procedures relating to safeguarding.
- The Governing Body will ensure that appropriate policies, procedures, and networks are in place to enable the Prevent duty of Italia Conti to be discharged.

18. Equality and Diversity

This policy is intended to ensure that no-one is treated in any way less favourably on the grounds of race, colour, nationality or ethnic or social origin, race, disability, gender, sexual orientation, gender reassignment, marriage and civil partnership, pregnancy and maternity, age, religion/ belief, or political/ other personal beliefs.

19. Linked Policies

This policy is linked to the following policies:

- *Safeguarding and Child Protection Policy*
- *Promoting British Values*
- *ICT policies*
- *Academic Freedom Code of Practice*
- *Freedom of Speech Code of Practice.*

Appendix 1: Definitions

Further context to support the new UK government 2024 definition of Extremism:

Aim 1 (negate or destroy fundamental rights and freedoms): Behaviour against a group, or members of it, that seeks to negate or destroy their rights to live equally under the law and free of fear, threat, violence, and discrimination. Including:

- Using, threatening, inciting, justifying, glorifying or excusing violence towards a group in order to dissuade them from using their legally defined rights and freedoms.

Aim 2 (undermine, overturn or replace liberal democracy): Attempts to undermine, overturn, or replace the UK's system of liberal parliamentary democracy and democratic rights. Including:

- Advocating that the UK's parliamentary democracy and democratic values and rights are not compatible with their ideology, and seeking to challenge, overthrow, or change our political system outside of lawful means.
- Using, threatening, inciting, justifying, glorifying or excusing violence towards citizens, in order to dissuade them from participating freely in the democratic process.
- Subverting the way public or state institutions exercise their powers, in order to further ideological goals, for example through entryism, or by misusing powers or encouraging others to do so.
- Using, threatening, inciting, justifying, glorifying or excusing violence towards public officials including our armed forces, police forces and members of local, devolved or national legislatures, in order to dissuade them from conducting their obligations freely and fearlessly, without external interference.
- Establishing parallel governance structures which, whether or not they have formal legal underpinning, seek to supersede the lawful powers of existing institutions of state.

Aim 3 (enabling the spread of extremism): Intentionally creating a permissive environment for behaviour in aim 1 or aim 2. Including:

- Providing an uncritical platform for individuals or representatives of groups or organisations that have demonstrated behaviour in either aim 1 or aim 2.
- Facilitating activity of individuals or representatives of groups or organisations that have demonstrated behaviour in either aim 1 or aim 2, including through provision of endorsement, funding, or other forms of support.
- The dissemination of extremist propaganda and narratives that call for behaviour in either aim 1 or aim 2.
- Attempts to radicalise, indoctrinate and recruit others to an ideology based on violence, hatred or intolerance, including young people.
- Consistent association with individuals or representatives of groups or organisations that have demonstrated behaviour in either aim 1 or aim 2 without providing critical challenge to their ideology or behaviour.

- If any behaviour listed in aim 1 or aim 2 has occurred previously, a refusal by the individual, group or organisation that conducted the behaviour to rescind, repudiate or distance themselves from the behaviour.

<https://www.gov.uk/government/publications/new-definition-of-extremism-2024/new-definition-of-extremism-2024#fn:3>

Further definitions

Bias:

inclination or prejudice for or against one person or group, especially in a way considered to be unfair.

Far Right:

Far-right politics are right-wing politics to the right of the mainstream centre right on the traditional left-right spectrum. They often involve a focus on tradition as opposed to policies and customs that are regarded as reflective of modernism.

ISIS/Daesh:

is a Wahhabi/Salafi jihadist Islamic extremist militant group. It is led by and mainly composed of Sunni Arabs from Iraq and Syria.

Migrant:

a person who moves from one place to another in order to find work or better living conditions.

Propaganda:

information, especially of a biased or misleading nature, used to promote a political cause or point of view.

Radicalisation:

is a process by which an individual or group comes to adopt increasingly extreme political, social, or religious ideals and aspirations and forms of extremism leading to terrorism.

Refugee:

a person who has been forced to leave their country in order to escape war, persecution, or natural disaster.

Terrorism:

the unofficial or unauthorized use of violence and intimidation in the pursuit of political aims.

Appendix 2: Prevent Duty Guidance – useful contacts and additional links

ROLE	NAME	CONTACT DETAILS
Single Point of Contact (SPOC) for Prevent.	Designated Safeguarding Lead	Safeguarding@italiaconti.co.uk
Chair of Board of Directors	Keith Bailey	Keith.Bailey@italiaconti.co.uk

HM government – PREVENT Duty Guidance

[Prevent duty guidance: England and Wales \(2023\) - GOV.UK](#)

Department of Education - Protecting Students and Children from radicalisation: the prevent duty

[The Prevent duty: safeguarding learners vulnerable to radicalisation - GOV.UK](#)

2018 government policy: counterterrorism

[Counter-terrorism strategy \(CONTEST\) 2018 - GOV.UK](#)

Department of Education – Keeping Students and Children safe in education

[Keeping children safe in education - GOV.UK](#)

Department of Education & Home Office – The use of social media for online radicalisation

[The use of social media for online radicalisation - GOV.UK](#)

Appendix 4: Advice and support

Prevent Advice Surrey

You should report any safeguarding issues to one of the Surrey Adult Learning safeguarding team whose contacts are available on the following link:

<https://www.surreycc.gov.uk/schools-and-learning/adult-learning/your-learning/safeguarding/your-safeguarding>

or speak directly to the

- Surrey's Multi-Agency Safeguarding Hub - 0300 470 9100
- Police - 999 in an emergency or 101 for less urgent concerns

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