# HBXL Prevent Policy

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| Notes | This document should be used in conjunction with the:<br>HBXL Adult Safeguarding Policy<br>HBXL Adult Safeguarding Procedure<br>HBXL Adult Safeguarding and Incident Reporting Flowchart<br>HBXL External Speaker Policy and Procedure<br>HBXL Freedom of Speech Policy<br>British Values at the HBXL Skills Academy (incorporating British Values within the Curriculum) |

## 1. Aims and Scope

As an education provider, HBXL Group has a duty to safeguard their learners and staff. This includes safeguarding learners from extremist ideologies and radicalisation. HBXL's Prevent Policy is designed to ensure that the HBXL Group has a structured and informed response to safeguarding concerns for learners who may be vulnerable to possible exploitation by terrorist/extremist groups.

The Prevent Policy will be shared with all employees as part of their induction programme. Thereafter, all employees will be expected to revisit the Prevent Policy on an annual basis. The Prevent Policy should be read in conjunction with HBXL's policies for adult safeguarding and equality, diversity and inclusion.

## 2. Context

In 2011 the Government published its Prevent Strategy designed to; (1) respond to the ideological challenge of terrorism and those that promote it; (2) prevent people from being drawn into terrorism and ensure that they are given appropriate support and (3) work with sectors and institutions where there are risks of radicalisation or extremism that need to be addressed.

The Counter –Terrorism and Security Act (2015) contains a duty on specified authorities, including education authorities to take steps to prevent people from being drawn into terrorism. This is known as the Prevent Duty. The Prevent Duty requires HBXL Group to establish mechanisms for understanding the risks of radicalisation, to ensure that staff understand these risks and how to deal with them, to communicate the importance of the Duty and to ensure that staff implement the duty effectively. The Duty also requires HBXL Group to promote 'fundamental British Values' to learners – defined as democracy, the rule of law, individual liberty and mutual respect and tolerance for those of different beliefs and faiths.

The United Kingdom currently faces a range of terrorist threats. There are currently 5 threat levels: Critical (an attack is expected imminent); 'Severe (an attack is high likely); Substantial (an attack is a strong possibility); Moderate (an attack is possible, but not likely); Low (an attack is highly unlikely). As of July 2026, the national terrorism threat level in the UK is currently categorised as 'severe',

meaning “an attack is highly likely”. The threat level was increased from ‘substantial’ on 30th April 2026.

The Home Office continues to assess Islamist extremism as the UK’s most significant terrorist threat, due to its organisational capability, international networks, and intent. Extreme right-wing terrorism remains the second-largest threat, with a growing number of young people influenced by online propaganda, conspiracy narratives, and violent extremist subcultures. Counter-terrorism policing also reports a sharp increase in non-ideological violent-fixation cases, including school-massacre style threats and individuals motivated by nihilistic or grievance-based violence rather than a coherent ideology. This evolving threat landscape demonstrates that radicalisation is increasingly driven by online spaces, mental-health vulnerabilities, and hybrid ideologies rather than traditional terrorist organisations alone.

Sources: Home Office, *CONTEST: The UK’s Counter-Terrorism Strategy (2024)*; Home Office Statistical Release, *Individuals referred to Prevent 2024–25*; Counter Terrorism Policing Annual Update (2025).

## 3. Definitions

**Terrorism** in the UK it is defined as a violent action that endangers a person’s life, involves serious violence against a person, causes serious damage to property, creates a serious risk to the public’s health and safety or interferes with or seriously disrupts an electronic system.

**Extremism** is defined as the vocal or active opposition to fundamental British values, including democracy, the rule of law, individual liberty, mutual respect for others and tolerance of different faiths and beliefs. Not all extremist groups will commit terrorist or violent acts but some groups pose particular threats, both on-line and off-line.

**Radicalisation** is the process by which a person comes to support terrorism and extremist ideologies associated with terrorist groups.

## 4. Policy Objectives

- To develop staff and learner awareness of the Government’s Prevent Strategy
- To ensure that learners and staff are aware of their roles and responsibilities in identifying and preventing radicalisation and extremism.
- To promote shared values and integration among learner communities, including ‘British Values’.
- To ensure learner safety and support for learners who may be at risk of radicalisation.
- To monitor, manage and deal effectively with any threat posed by individuals supporting or engaging in extremism in the name of ideology or belief.

## 5. Responsibilities within the Prevent Duty

### *Leadership and Management*

Leadership and Management is about assessing the threats from terrorism, extremism and radicalisation and ensuring plans are in place to respond appropriately to such threats. Overall responsibility for the management of Prevent will rest with the HBXL Group Designated Safeguarding Lead and Deputy Designated Safeguarding Lead. The responsibilities of these post-holders are listed in Appendix 1.

### *Staff*

All staff have a responsibility to: uphold HBXL Group’s values and promote respect, equality, diversity and inclusion, understand factors that may make people vulnerable to extremism, use opportunities

to educate and challenge extremist ideas, report concerns about the risks of radicalisation, report any literature that could cause offense or promote extremist views and provide support to learners at risk of harm from extremist activity. All staff are also expected to participate in Prevent training.

### *Learners*

All learners will be expected to adhere to the terms of HBXL's Group Prevent Policy. They are expected to work closely with the HBXL Group in challenging extremist ideas, which risk drawing people into terrorism, and reporting concerns if a fellow learner is at risk of radicalisation. Learners should report any Prevent concerns to the Designated Safeguarding Lead. Contact details provided in Appendix 1.

## 6. Measures to mitigate risk

### *Prevent Awareness*

All Designated Safeguarding Staff will receive external Prevent awareness training.

All new staff members receive Prevent training as part of their induction; refresher training is also given annually. Training is recorded on HBXL's Core Safeguarding Staff Checks & Training Record. Quarterly Prevent staff meetings ensure that staff understand the factors that make people susceptible to being drawn into terrorism and are able to take appropriate action to prevent risks to learners and staff, including referrals and where to get additional advice and support. Additionally, weekly staff meetings provide a forum for leaders to refresh safeguarding and Prevent awareness and for staff to discuss any learners of concern.

Staff competency is evaluated through annual safeguarding and Prevent audits.

By requiring attendance at quarterly training and weekly meetings, and completion of annual audits, HBXL Group also ensures that sub-contractors understand the factors that make people susceptible to terrorism and extremism and how to deal with safeguarding risks.

HBXL Group aims to ensure that learners have an understanding of British Values, Prevent and radicalisation and are able to identify if they or a fellow learner may be at risk of radicalisation. Learners are required to read HBXL's Prevent Policy, alongside other well-being and safeguarding policies, as part of the enrolment process. The HBXL Learner Handbook includes information on Prevent, explains what extremism is and includes information on how to make a Prevent referral. In addition, an introduction to Prevent is made during the course introductory sessions and revisited during the Online Safety module and other modules as appropriate.

The HBXL Learner Handbook gives a summary of British Values. An understanding of 'fundamental British Values', including respect for others, is developed during the introductory session and embedded throughout the curriculum.

A learner newsletter, covering topics such as well-being and safeguarding, health and safety at work, online safety and Prevent, is being introduced during 2026-27, to reinforce teaching and consolidate learners' understanding of how to keep themselves safe.

HBXL sets out its aims with regards to British Values, and highlights the links to British Values in the curriculum, in the document titled "British Values at the HBXL Skills Academy".

### *External Partnerships*

HBXL Group has developed partnerships with external safeguarding and Prevent authorities. Although HBXL offers training throughout England, the local South West contact provides the first port of call for Prevent support, advice and training.

HBXL maintains a list of Regional Contest Coordinators and Counter Terrorism Policing Contacts in every delivery region. Counter Terrorism Local Profiles (CTLPs) are obtained for each of the regions in which HBXL operates, to better understand regional terrorism risks. HBXL's DSL and DDSL attend CTLP briefings, and regional and national forums with Regional Contest Coordinators to obtain advice from DfE, Counter Terrorism Policing and Ofsted. In addition, all tutors and learner engagement staff keep up-to-date with the latest Prevent developments via the DfE's Regional Prevent Coordinator newsletters.

HBXL's Safeguarding Team keep up to date with best practice through relationships with other external partners, such as FE colleges, CITB and regional DfE Skills Bootcamp teams, by attendance at best practice meetings across the regions.

HBXL Group will provide advice and support to individuals who raise concerns and ensure that they are signposted to relevant support agencies. Where subcontractors and employers are involved in the delivery of courses, HBXL Group will ensure that the subcontractor or employer is aware of the Prevent Duty and not inadvertently linked to extremist organisations.

### *External Speaker Requests*

HBXL's Freedom of Speech Policy sets out our commitment to providing a balanced and inclusive environment which encourages critical thinking, open discussion, and respectful debate alongside its duty of care for the welfare of staff and learners. Freedom of speech is limited by rule of law and does not allow individuals to unlawfully discriminate against or harass, or incite violence or hatred against, other persons or groups. HBXL's External Speaker Policy and Procedure provides a framework for the request, assessment and approval of events with external speakers to ensure that debate, challenge and dissent are not only permitted but expected, while safeguarding our staff, learners and reputation.

### *Curriculum Activity*

As part of the Prevent Duty, HBXL Group are expected to teach 'British Values' as an intrinsic part of our curriculum. British Values are intended to challenge extremist ideologies and are defined as:

- Democracy - all have a role in using opinion to influence decision-making.
- Rule of Law – laws protect everyone; no one is above the law.
- Individual Liberty – freedom of speech and expression.
- Mutual respect for others, regardless of background or orientation.
- Tolerance of different faiths and beliefs.

British Values are taught as part of measures to support the personal development of learners: to facilitate the learner voice, to help learners distinguish right from wrong, to get learners to accept responsibility for their own behaviour, to support freedom of speech and personal choice, to appreciate diversity, to showing respect to others, to challenge discrimination and show tolerance to other cultural traditions. Learners are also taught to recognise and manage risk, think critically, and make reasoned arguments. Prevent is not about trying to silence strong voices or opinion. Instead, it is concerned with preventing the translation of strongly held views into deliberate violence against others.

HBXL Group's educational provision is based on the characteristics of British Values. We aim to create an environment which fosters the key principles of British Values. British Values are introduced to learners at the start of each course, in a discrete British Values module. They are also revisited throughout the curriculum in a relation to the themes and subjects being delivered. In addition, British Values are outlined.

Learner understanding of Prevent and British Values is evaluated through knowledge checks and Safeguarding surveys.

### Democracy

We encourage democracy at the HBXL Skills Academy through:

- Consultancy with our learners, encouraging feedback and listening to your views and recommendations
- Consultancy with our employers and listening to their views and recommendations
- Consultancy with our tutors and staff as to how our courses are run and how your teaching is delivered
- Providing content on democracy in the curriculum.

### Rule of Law

We encourage the rule of law at the HBXL Skills Academy through:

- Ensuring all learners know what is expected of them during their course including, arriving on time, attendance live to course modules and completion of homework on time
- Ensuring all learners and staff mutually respect each other in the virtual classroom
- Ensuring all learners feel safe in the virtual classroom
- Providing feedback in a constructive, timely manner to all learners
- Providing content on the rule of law in the curriculum.

### Individual Liberty

We encourage individual liberty at the HBXL Skills Academy through:

- Supporting learners to develop their knowledge, self-esteem and confidence
- Encouraging learners to take responsibility for their behaviour and knowing their rights
- Encouraging discussion in the virtual classroom and for learners to think for themselves and express themselves
- Encouraging learners and staff to act independently and freely whilst respecting others
- Encouraging learners to ask for help and knowing who to ask for help from
- Ensuring learners and tutors are valued and actively listened to
- Implementing a strong anti-bullying culture
- Challenging stereotypes.

### Respect and Tolerance

- We encourage respect and tolerance at the HBXL Skills Academy through:
- Having in place robust policies and procedures which tackle prejudice, harassment and bullying
- Enrolling learners of all faiths, genders, sexualities, religions, cultures and backgrounds
- Promoting respect for individual differences
- Helping learners acquire and understanding of and respect for their own and other cultures ways of life
- Discussions around the differences between ethnicity, background and individual, sometimes different approaches to problems which require solutions
- A diverse and varied curriculum including equality, diversity, and inclusion modules.

### *Online Safety*

As HBXL Group's courses are offered remotely via web-based technologies, we take the online safety of our learners seriously. HBXL Group recognises that technology often provides the platform for facilitating harm, including radicalisation. The online space, including less regulated social media and

gaming platforms, continues to be one of the primary influencing factors affecting individuals susceptible to radicalisation. HBXL therefore take steps to protect and educate learners in their use of technology and establish mechanisms to identify and intervene in any incidents of online exploitation.

Online Safety is introduced as part of the digital software modules, to familiarise learners with ways of staying safe online. The online safety curriculum content includes topics such as reporting cyberbullying and online abuse, awareness of propaganda, evaluating online sources, critical thinking, avoiding extremist ideas or illegal behaviour and how to make a Prevent referral. Online safety is reinforced at various points throughout each course to support learners' personal development. In addition, tips and reminders about staying safe online are shared in our Learner handbook.

### *Digital Monitoring & Ethical Use of Technology*

HBXL Group uses proportionate and ethical digital-monitoring practices to help identify potential safeguarding or Prevent concerns during remote learning. Monitoring is limited to activity that occurs within HBXL's learning platforms and virtual classrooms, and is designed solely to protect learners and staff from harm, including exposure to extremist content. HBXL does not conduct intrusive surveillance or access personal data beyond what is necessary to maintain a safe learning environment. Any concerning material identified during remote log-ins or online interactions is reviewed by the Designated Safeguarding Lead in line with HBXL's Safeguarding and Prevent procedures, ensuring that all actions are lawful, transparent and respectful of learner privacy.

### *HBXL Group Risk Assessment*

Prevent guidance requires that all educational institutions should carry out a risk assessment which assesses where and how learners or staff may be at risk of being drawn into terrorism, including extremist ideas that are part of terrorist ideology. To ensure that its approach to exercising its Prevent Duty is robust and effective, HBXL's Designated Safeguarding Lead annually, and additionally as required, undertakes a comprehensive assessment and updates the risk assessment in line with training and latest best practice. Where a risk is identified, HBXL Group will develop an action plan setting out the actions to be taken to mitigate the risks. Actions are monitored in HBXL's quarterly Quality Improvement Planning meetings. HBXL's Prevent Risk Assessment and Quality Improvement Plans are stored on OneDrive. The HBXL Group has clear and visible policies and procedures for managing whistleblowing and complaints.

## 7. Identifying potential risk

There is no single way of identifying an individual who is likely to be susceptible to an extremist ideology. It can happen in many different ways and settings. Learners may become susceptible to radicalisation through a range of social, personal and environmental factors. They may be exploring new ideas, or establishing new identities. They can be exposed to extreme messages e.g. on the internet, they be targeted by terrorist groups. Exposure to extremist groups increases risks of young people being drawn into criminal activity, and the potential to cause significant harm.

Extremism therefore comes from a range of backgrounds and experiences and there is no such thing as a 'typical extremist'. There are however, a number of indicators, which suggest, with differing levels of probability, that a person may be vulnerable to or involved with extremism and these are listed in Appendix 2. These indicators should be used to identify possible risk, without suggesting that persons exhibiting these characteristics are necessarily at potential or actual risk.

## 8. Dealing with risk to individual learners

Radicalised learners can act as a focal point for further radicalisation through personal contact with fellow learners or with other persons outside HBXL Group. HBXL Group will assess the risk of learners or staff being drawn into extremist activity and take action where there is evidence of actual engagement in extremism. Staff have a duty to report any concerns about terrorism or extremism involving other staff, volunteers, learners, contractors or other visitors. This duty also extends to reporting any inappropriate material which is identified during remote log-in to learners' devices.

Where a member of staff has such a Prevent concern, this must be reported to the Designated Safeguarding Lead or Deputy, following the procedure set out in the "HBXL Safeguarding and Incident Reporting Flowchart" (see Appendix 3). The DSL will assess the risk and where appropriate will contact the Local Authority or the police for further advice and guidance. Where a learner is thought to be at risk of significant harm, a referral to Adult Safeguarding Services will be made in line with the HBXL Group Adult Safeguarding procedures.

Where there is information that a violent act is imminent, or where weapons or other materials may be in the possession of a learner or a community member, a 999 call will be made and the HBXL Group's Senior Management team informed as soon as practicably possible. As part of the referral process, the DSL will also contact Channel. Where a child or vulnerable adult is thought to be at risk of significant harm, a referral to Social Services will be made in line with the HBXL Group safeguarding procedures, following advice from the appropriate Prevent Coordinator.

The HBXL Group will provide pastoral care and support for all learners at risk of harm from extremist activity. It will also work with other agencies to share information about vulnerable individuals.

## 9. Monitoring and review of the strategy

Designated Safeguarding Staff will review the scope and effectiveness of this strategy annually. They will identify any areas for improvement, detail relevant changes to the Prevent agenda and update the Prevent policy to ensure that learners are safe. The latest version of the document will be maintained on the HBXL Group website.

## Appendix 1: Designated Persons for Prevent

### *Designated Safeguarding Leads*

The designated senior member of staff with lead responsibility for safeguarding issues including Prevent, is the Skills Academy Lead, who is the Designated Safeguarding Lead. The general duties and training of this person are recorded in the HBXL Group Adult Safeguarding Policy.

As of July 2026, the Designated Safeguarding Lead is Joanna Mulgrew.

Joanna.mulgrew@hbxl.co.uk

Additional duties that relate specifically to the Prevent Strategy include:

- Overseeing the referral of any safeguarding cases that relate to Prevent activities.
- Providing advice and support to staff on issues relating to Prevent.
- Maintaining a proper record of any safeguarding referrals, complaints or concerns.
- Ensuring that learners and other stakeholders are aware of the HBXL Group's Prevent duties.
- Liaising with the LEA, local Prevent Coordinator, Social Services and other relevant agencies, acting as the Single Point of Contact (SPOC).
- Ensuring staff training in Prevent issues and safeguarding procedures.
- Ensuring a whole HBXL Group approach to implementation of the HBXL Group's Prevent duties and that Prevent is considered within all relevant policies and processes.

### *Other Designated Staff Members*

The other designated members of staff with responsibility for safeguarding issues, including Prevent, are the Deputy Designated Safeguarding Leads.

As of July 2026, the Deputy Designated Safeguarding Lead is Olivia Woodhams.

Olivia.woodhams@hbxl.co.uk

Additional duties that relate specifically to the Prevent Strategy include:

- Reporting to the senior member of staff with lead responsibility for Prevent.
- Ensuring that staff and learners are aware of the Prevent agenda.
- Providing advice and support to learners and staff on issues relating to Prevent.
- Ensuring appropriate training is in place.
- Making appropriate referrals to the local Prevent Coordinator and Channel.

## Appendix 2: Persons at Risk of Engagement in Extremist Activity

Extremism comes from a range of backgrounds and experiences and there is no such thing as a 'typical extremist'. There are however, a number of indicators, which suggest with differing levels of probability that a young person or their family may be vulnerable to or involved with extremism. These indicators will be used to identify possible risk, without suggesting that persons exhibiting these characteristics are necessarily at automatic or actual risk.

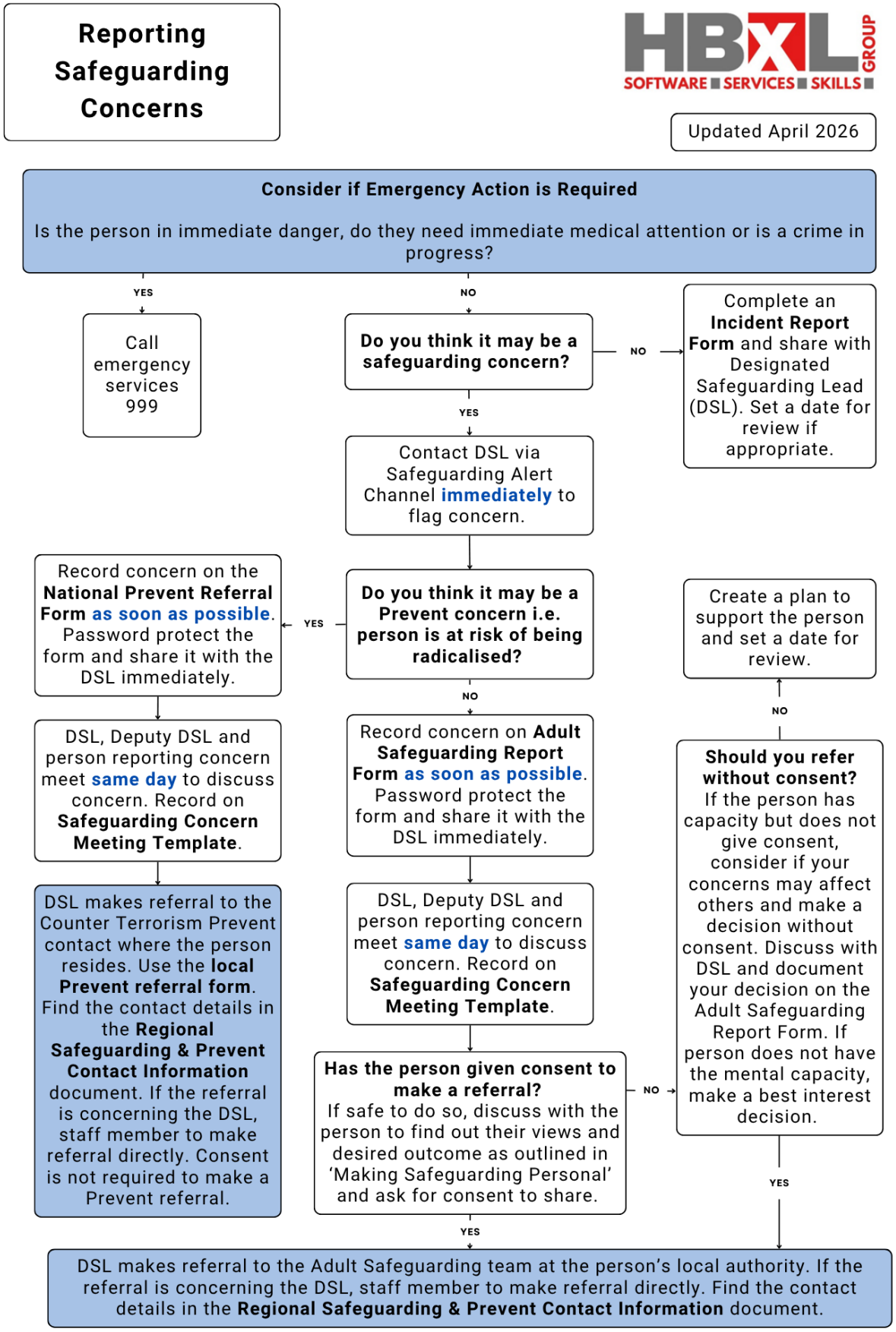
### *Personal susceptibility*

- Identity crisis – persons uncomfortable with their place in the society around them.
- Personal crisis - searching for answers to questions about identity, faith and belonging.
- Personal circumstances - experience of disadvantage, discrimination or social exclusion.
- Unmet aspirations - low self-esteem; perceptions of injustice; rejection of civic life.
- Criminality - experiences of imprisonment; involvement with criminal groups.

### *Access to extremist influences*

- Association with those known to be involved in extremism.
- Possession or distribution of extremist material.
- Access to extremist websites, especially those with a social networking element.
- Travel to international locations known to be associated with extremism.
- First-hand experience of racial or religious hate crime.

### *Opinions and behaviours*

- Extreme concerns regarding another section of society.
- Verbal or written support for extremist causes or intolerance of moderate views.
- Justifying the use of violence to solve societal issues.
- Joining an extremist organisation.
- Expressed desire/intent to take part in, or support extremist activity.
- Fraudulent identity/use of documents to support this.
- Significant changes to appearance, behaviour or health.

## Appendix 3: HBXL Safeguarding and Incident Reporting Flowchart