



# Counter-Terrorism, Prevent Duty & County Lines Safeguarding Policy

## 1. Policy Statement

JC Training & Consultancy Ltd is committed to safeguarding learners and staff from all forms of exploitation, radicalisation, terrorism-related activity, and criminal exploitation, including County Lines activity.

We recognise that vulnerability to radicalisation and exploitation can affect any individual, regardless of background, age, or circumstance. We therefore adopt a proactive safeguarding approach that focuses on early identification, intervention, and appropriate escalation of concerns.

This policy sits within our wider safeguarding framework and is applied in conjunction with Keeping Children Safe in Education (KCSIE), the Prevent Duty, and relevant UK legislation.

## 2. Legal and Statutory Framework

This policy is underpinned by:

- Counter-Terrorism and Security Act 2015 (Prevent Duty)
- Keeping Children Safe in Education (KCSIE 2025/2026 application)
- Working Together to Safeguard Children
- Serious Crime Act 2015
- Modern Slavery Act 2015
- Children Act 1989 and 2004
- UK GDPR and Data Protection Act 2018



- Education and Training (Welfare of Children) requirements

### **3. Prevent Duty Commitment**

JC Training & Consultancy Ltd fully recognises its statutory duty under the Prevent strategy to have “due regard to the need to prevent people from being drawn into terrorism.”

We commit to:

- Identifying early indicators of radicalisation
- Ensuring staff are trained to recognise vulnerability factors
- Providing safe environments for discussion and challenge of ideas
- Referring concerns through appropriate safeguarding channels
- Working in partnership with Channel Panels and relevant authorities where required

Prevent is embedded within our safeguarding culture and is not treated as a standalone process.

### **4. Understanding Radicalisation and Vulnerability**

Radicalisation is the process by which an individual may come to support or engage in extremist ideologies or terrorist activity.

Vulnerability factors may include:

- Social isolation or exclusion
- Identity conflict or crisis
- Exposure to extremist narratives online
- Personal trauma or adverse life experiences
- Influence from peers, family, or online networks

It is important to note that vulnerability does not indicate intent, and safeguarding responses must remain proportionate and non-judgemental.



## **5. Indicators of Concern (Prevent)**

Staff are trained to recognise potential indicators, which may include:

- Sudden changes in behaviour or identity
- Expressing extremist views or justification of violence
- Increased isolation from peers or activities
- Use of extremist terminology or symbolism
- Accessing or sharing extremist content online
- Intolerance towards other groups or viewpoints

No single indicator confirms radicalisation; concerns are assessed holistically.

## **6. County Lines and Criminal Exploitation**

County Lines refers to criminal gangs or networks involved in transporting and selling illegal drugs from urban to rural or coastal areas, often exploiting vulnerable individuals.

JC Training & Consultancy Ltd recognises County Lines as a serious safeguarding concern involving child criminal exploitation (CCE).

We are committed to identifying and responding to signs of exploitation at the earliest opportunity.

## **7. Indicators of County Lines Exploitation**

Potential warning signs include:

- Unexplained absence from learning or work
- Sudden acquisition of money, goods, or mobile phones
- Frequent travel outside local area without explanation
- Changes in behaviour, mood, or peer group
- Reluctance to speak openly or appear anxious when discussing whereabouts



- Physical injuries or signs of neglect

Staff are expected to remain professionally curious and report concerns even where uncertainty exists.

## 8. Safeguarding and Reporting Procedures

All Prevent or County Lines concerns must be treated as safeguarding concerns.

Staff must not investigate but must:

- Record concerns factually
- Report immediately to the DSL or Deputy DSL
- Use the safeguarding reporting email:  
[safeguarding@jctrainingandconsultancy.co.uk](mailto:safeguarding@jctrainingandconsultancy.co.uk)

Escalation routes:

- DSL: Jennifer Crook – [jenny.crook@jctrainingandconsultancy.co.uk](mailto:jenny.crook@jctrainingandconsultancy.co.uk) | 07540 285652
- Deputy DSL: Kaley Casson – [kaley@jctrainingandconsultancy.co.uk](mailto:kaley@jctrainingandconsultancy.co.uk)

The DSL will assess risk and determine appropriate escalation, which may include referral to Channel, local safeguarding services, or police involvement.

## 9. Channel Referral Process

Where a Prevent concern is assessed as requiring external support, a referral may be made to the Channel programme.

Channel is a multi-agency safeguarding process designed to support individuals at risk of radicalisation through early intervention.

Referrals are:

- Evidence-based
- Proportionate
- Multi-agency reviewed



- Focused on safeguarding rather than criminalisation

## **10. Information Sharing and GDPR Compliance**

Information sharing is conducted in line with UK GDPR and safeguarding legislation.

Confidentiality is maintained unless there is a safeguarding concern, in which case information will be shared on a need-to-know basis with relevant authorities.

Prevent and County Lines concerns justify lawful information sharing under public interest and safeguarding exemptions.

## **11. Staff Training and Awareness**

All staff receive mandatory training covering:

- Prevent Duty awareness
- Indicators of radicalisation and extremism
- County Lines and criminal exploitation awareness
- Safeguarding escalation procedures
- Professional curiosity and reporting thresholds

Training is refreshed annually and updated in line with statutory guidance changes.

## **12. Online Safety**

The organisation recognises the significant role of online platforms in radicalisation and criminal exploitation.

We promote:

- Safe online behaviour
- Awareness of misinformation and extremist content
- Responsible use of digital platforms
- Early reporting of online safeguarding concerns



### **13. Whistleblowing**

Staff are encouraged to report concerns about safeguarding practice, extremism-related concerns, or organisational risks without fear of reprisal. All concerns will be taken seriously and investigated appropriately.

### **14. Monitoring and Review**

This policy is reviewed annually or earlier, where:

- Prevent Duty guidance is updated
- New safeguarding risks emerge
- Incidents occur that indicate policy review is required
- Structural or delivery changes occur

Effectiveness is monitored through safeguarding audits, training compliance checks, and leadership review.

### **15. Emergency Action**

Where there is an immediate risk of harm or a credible terrorist threat:

- Contact emergency services immediately (999)
- Notify DSL without delay
- Record the incident factually as soon as possible

### **16. Policy Commitment**

JC Training & Consultancy Ltd is committed to protecting learners from radicalisation, terrorism-related influence, and criminal exploitation, including County Lines activity.

We recognise that effective safeguarding in these areas requires vigilance, professional judgement, and strong partnership working with statutory agencies. This policy supports a



proactive safeguarding culture focused on early identification, proportionate response, and continuous improvement.

## Referral Points

**County Lines:** National Crime Agency <https://www.nationalcrimeagency.gov.uk/what-we-do/crime-threats/drug-trafficking/county-lines>

**Radicalisation:** ACT <https://actearly.uk/contact/>

**Modern Slavery:** GOV <https://www.modernslavery.gov.uk/start>