



# Prevent Policy

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## 1. Introduction

Prevent is part of a Government initiative to develop a robust counter terrorism programme – CONTEST. The UK faces a range of terrorist threats. All the terrorist groups who pose a threat to us seek to radicalise and recruit people to their cause.

The Prevent strategy seeks to:

- Respond to the ideological challenge of terrorism and aspects of extremism, and the threat we face from those who promote these views
- Provide practical help to prevent people from being drawn into terrorism and ensure they are given appropriate advice and support
- Work with a wide range of sectors where there are risks of radicalisation which needs to be addressed, including education, criminal justice, faith, charities, the internet and health

The Prevent duty, which requires the Education sector to have "due regard to the need to prevent people from being drawn into terrorism", supporting terrorism or being drawn into non-violent extremism. This is extended to Employers when working with apprentices.

Our expectation is that all employers with whom we work have a shared ethos to keeping apprentices safe. This policy can be viewed on our website.

- Home Office Prevent & Channel Fact Sheet 19th December 2019  
<https://homeofficemedia.blog.gov.uk/2019/12/19/prevent-and-channel-factsheet/>

## 2. Counterterrorism and Security Act

Section 26 of the Counterterrorism and Security Act places a duty on certain bodies (specified authorities – listed in Schedule 6) to have “*due regard to the need to prevent people from being drawn into terrorism*”.

Guidance is issued under Section 29 of the Act:

- Respond to the ideological challenge of terrorism and the threat we face from those who promote it
- Prevent people from being drawn into terrorism and ensure that they are given appropriate advice and support
- Work with sectors and institutions where there are risks of radicalisation that we need to address

### Purpose of Prevent

- Prevent aims to safeguard vulnerable individuals (both adults and children) who may be at risk of potentially becoming involved in terrorist activities
- It also aims to support institutions, such as schools, colleges and universities where this may happen

- All frontline staff have a responsibility to report any instances where they think they have identified a Safeguarding issue to their Safeguarding Lead

## Responsibilities

All staff have a legal responsibility under the Prevent Duty to make sure that:

- They have undertaken training in the Prevent Duty as identified by their management
- They are aware of when it is appropriate to refer concerns about learners to the Prevent officer, usually the provider's Safeguarding officer
- They exemplify British values of "democracy, the rule of law, individual liberty and mutual respect and tolerance for those with different faiths and beliefs" into their practice

## The Prevent Strategy will specifically

The strategy will specifically:

- Respond to the ideological challenge of terrorism and the threat we face from those who promote it
- Prevent people from being drawn into terrorism and ensure that they are given appropriate advice and support and work with sectors and institutions where there are risks of radicalisation which we need to address

## 3. CONTEST

CONTEST is the Government's Counter Terrorism Strategy, published in July 2006 and refreshed in March 2009.

The aim of the strategy is 'to reduce the risk from international terrorism, so that people can go about their lives freely and with confidence.'

- **CONTEST** has four strands, often known as the four Ps. The aims of the 4 Ps are:
- **PREVENT** - to stop people becoming terrorists or supporting violent extremism
- **PURSUE** - to stop terrorist attacks through disruption, investigation and detection
- **PREPARE** - where an attack cannot be stopped, to mitigate its impact
- **PROTECT** - to strengthen against terrorist attack, including borders, utilities, transport infrastructure and crowded places

## 4. Extremism

The Government has defined extremism as "vocal or active opposition to fundamental British values, including democracy, the rule of law, individual liberty and mutual respect and tolerance of different faiths and beliefs". This also includes calls for the death of members of the British armed forces.

Please see British Values Policy for further information including how we embed this into the curriculum and learning journey.

## 5. Terrorism

Terrorism is an action that endangers or causes serious violence to a person/people, causes serious damage to property or seriously interferes or disrupts an electronic system.

The use of threat must be designed to influence the Government or to intimidate the public and is made for the purpose of advancing a political, religious or ideological cause.

## 6. Radicalisation

People can be drawn into violence, or they can be exposed to the messages of extremist groups, by many means.

The risk of radicalisation is the product of a number of factors and identifying this risk requires that staff exercise their professional judgement, seeking further advice as necessary.

It may be combined with other vulnerabilities or may be the only risk identified. Potential indicators include:

- Use of inappropriate language
- Possession of violent extremist literature
- Behavioural changes
- The expression of extremist views
- Advocating violent actions and means
- Association with known extremists
- Seeking to recruit others to an extremist ideology

## 7. Channel

Channel is an early intervention multi-agency process designed to safeguard vulnerable people from being drawn into violent extremist or terrorist behaviour. Channel works in a similar way to existing safeguarding partnerships aimed at protecting vulnerable people.

### Who does Channel work with?

Channel is designed to work with individuals of any age who are at risk of being exploited by extremist or terrorist ideologues.

The process is shaped around the circumstances of each person and can provide support for any form of radicalisation or personal vulnerabilities.

### How does Channel work?

Each Channel Panel is chaired by a local authority and brings together a range of multi-agency

partners to collectively assess the risk and can decide whether a support package is needed.

The group may include statutory and non-statutory partners, as well as lead safeguarding professionals. If the group feels the person would be suitable for Channel, it will look to develop a package of support that is bespoke to the person. The partnership approach ensures those with specific knowledge and expertise around the vulnerabilities of those at risk are able to work together to provide the best support.

Channel interventions are delivered through local partners and specialist agencies. The support may focus on a person's vulnerabilities around health, education, employment or housing, as well as specialist mentoring or faith guidance and broader diversionary activities such as sport. Each support package is tailored to the person and their particular circumstances.

### How will the person be involved in this process?

A person will always be informed first if it's felt that they would benefit from Channel support. The process is voluntary and their consent would be needed before taking part in the process. This process is managed carefully by the Channel Panel.

Anyone can make a referral. Referrals come from a wide range of partners including education, health, youth offending teams, police and social services.

### What happens with the referral?

Referrals are first screened for suitability through a preliminary assessment by the Channel Coordinator and the local authority. If suitable, the case is then discussed at a Channel panel of relevant partners to decide if support is necessary.

Raising a concern if you believe that someone is vulnerable to being exploited or radicalised, please use our established safeguarding procedures to escalate your concerns to the Designate Safeguarding Lead who can raise concerns to Channel if appropriate.

## 8. Our Responsibility

It is our responsibility, and the responsibility of Employers, to protect apprentices and employees from radicalising influences. We do this by building apprentices and employee's resilience to extreme narratives during our curriculum and ensuring this is embedded within the full learning journey.

During support and supervision, we identify any vulnerabilities or worrying changes in behaviour and know what to do if you have concerns about an apprentice or employee. Our close communication with Employers ensures this ethos and commitment is shared as it is crucial for all education establishments and employers to be involved in the Prevent strategy.

Genius People has a part to play in fostering shared values and promoting cohesion. Genius People focus on the risks of violent extremism, which represents the greatest threat at the national level while recognising that other forms of violence and extremism can and do manifest themselves within Genius People and other training settings. The Prevent Strategy has five key objectives:

1. To promote and reinforce shared values; to create space for free and open debate, and to listen and support the learner's voice.
2. To break down segregation among different learner communities including by supporting inter-faith and inter-cultural dialogue and understanding, and to engage all learners in playing a full and active role in wider engagement in society
3. To ensure learner safety and that Genius People is free from bullying, harassment and discrimination
4. To provide support for learners who may be at risk and appropriate sources of advice and guidance
5. To ensure that learners and staff are aware of their roles and responsibilities in preventing violent extremism.

In order to achieve these objectives, the strategy will concentrate on four areas:

### Leadership and Values

To provide an ethos which upholds core values of shared responsibility and wellbeing for all learners, staff and visitors and promotes respect, equality and diversity and understanding. This will be achieved through:

- Promoting core values of respect, equality and diversity, democratic society, learner voice and participation
- Building staff and learner understanding of the issues and confidence to deal with them
- Deepening engagement with local communities
- Actively working with local schools, local authorities, police and other agencies

### Teaching and Learning

To provide a curriculum which promotes knowledge, skills and understanding to build the resilience of learners, by undermining extremist ideology and supporting the learner's voice. This will be achieved through:

- Embedding equality, diversity and inclusion, wellbeing and community cohesion
- Promoting wider skill development such as social and emotional aspects of learning
- A curriculum adapted to recognise local needs, challenge extremist narratives and promote universal rights
- Encouraging active citizenship/participation and learner's voice

### Learner Support

To ensure that staff are confident to take preventative and responsive steps working with partner professionals, families and communities. This will be achieved through:

- Establishing strong and effective learner support services
- Listening to what is happening at Genius People and the community
- Implementing anti-bullying strategies and challenging discriminatory behaviour

- Helping learners and staff know how to access support at Genius People and or through community partners
- Supporting at-risk learners through safeguarding and crime prevention processes
- Focussing on narrowing the attainment gap for all learners

## Managing Risks and Responding to Events

To ensure that Genius People monitors risks and is ready to deal appropriately with issues which arise. It will do this through:

- Understanding the nature of the threat from violent extremism and how this may impact directly or indirectly on us
- Understanding and managing potential risks within the company
- Training and from external influences
- Responding appropriately to events in local, national or international news that may impact on learners and communities
- Ensuring measures are in place to minimise the potential for acts of violent extremist within Genius People i.e. Safeguarding and Prevent risk assessment
- Ensuring plans are in place to respond appropriately to a threat or incident within the company
- Developing effective ICT security and responsible user policies

## 9. What do I do if I am worried about the radicalisation of a learner or member of staff?

Contact the appointed people within Genius People and explain the situation.

The deputy and/or the Lead safeguarding officer will deal directly with the situation, alerting government agencies to ensure a swift response and necessary support for the named person should this be deemed necessary.

Position	Name	Contact Details	Address
<b>Genius Lead Designated Officer</b>	Judith Jackson	jjackson@geniuspeople.co.uk 07464 497 773 0141 280 0265	1439 Cumbernauld Road Glasgow G33 1AN
<b>Genius Additional Designated Officer</b>	Jennifer McEwan	jmcewan@geniuspeople.co.uk 07876 578 281 0141 280 0265	1439 Cumbernauld Road Glasgow G33 1AN
<b>Genius Additional Designated Officer</b>	Alison Smith	asmith@geniuspeople.co.uk 07825 955 417 0141 280 0265	1439 Cumbernauld Road Glasgow G33 1AN

If you view this be time sensitive you can contact the National Confidential Anti-Terrorist Hotline 0800 789 321 and in an emergency, always dial 999.

## 10. Additional Reading

The below links will take you to some really useful guides for about Ofsted Inspections. The first link is an overall guide with the next two being specific guidance for Full & Short inspections.

- Inspection Guidance for FE & Skills Providers: <https://www.gov.uk/guidance/inspecting-further-education-and-skills-guide-for-providers>
- Specifically for full inspections: <https://www.gov.uk/guidance/inspecting-further-education-and-skills-guide-for-providers#full-inspections-of-further-education-and-skills-providers>
- Specifically for short inspections <https://www.gov.uk/guidance/inspecting-further-education-and-skills-guide-for-providers#short-inspections-of-further-education-and-skills-providers>

## 11. List of Recommendations from ESFA Guidance

RECOMMENDATION 1	Organisations develop safeguarding awareness amongst those involved in the recruitment process. Consideration should be given to a level of bespoke or specialist input to meet the needs of their role.
RECOMMENDATION 2	Organisations develop systems for the early identification, recording & flagging as appropriate of welfare, learning & potential safeguarding needs of learners at time of recruitment
RECOMMENDATION 3	The use of specific questionnaires to better ensure all potential safeguarding, Prevent, welfare issues are identified & explored at this stage would help to reduce risks where no face-to-face engagement takes place during recruitment.
RECOMMENDATION 4	Those providers with learners aged 16 to 18 should develop specific policies & procedures (or incorporate into existing ones) providing enhanced protection & support & protection for those learners & ensure that staff are aware of the greater risks to this group.
RECOMMENDATION 5	Where possible face to face induction, at the earliest opportunity, should be the norm but where such

	practice does not exist (whether occasionally or as routine business) then inherent risks should be addressed through a robust, quality checked, process to ensure potential issues are identified & addressed.
RECOMMENDATION 6	Staff engaged in this area of business (recruitment & induction) should be provided with a level of Prevent & Safeguarding training that enhances their ability to identify issues which either basic or some online training may not equip them with.
RECOMMENDATION 7	The provision of detailed Learner Handbooks setting out all available support & safeguarding contacts should be a key requirement for inclusion in induction processes. Mandated & specific additional testing of understanding for more vulnerable learners (including 16 to 18 year olds) should be integrated into these processes & subject to quality checking.
RECOMMENDATION 8	Mandated follow up contacts with learners in first month/6 weeks after start date to include reminders of key welfare support opportunities, contacts & to explore identified welfare & safeguarding issues.
RECOMMENDATION 9	In order for assessors to be able to carry out this function effectively they must receive robust & role specific Safeguarding & Prevent training, including training in the exemplifying and promoting of British Values to learners, as required by Ofsted. The over reliance, in some cases, on broad, generic online training creates a risk that should be managed as a priority by providers.
RECOMMENDATION 10	Assessor meetings with learners should primarily be face to face & timetabled to ensure that both learner & assessor can prepare in advance. Sessions should be of sufficient length to allow time for exploration of safeguarding & welfare matters as well as British Values & should be in an environment/location conducive to this.
RECOMMENDATION 11	Ensure that assessor reports on learners are structured to mandate questions regarding welfare & safeguarding/Prevent with both learner & employer.
RECOMMENDATION 12	Providers should ensure that employers have a designated contact (SPOC) who has received (& evidenced) a level of safeguarding/Prevent training (including refreshers) deemed acceptable to the provider.

RECOMMENDATION 13	Employers to guarantee that the SPOC will be available to provide feedback to the assessor as well accepting responsibility for fulfilling the requirements on behalf of the employer as outlined in employer handbooks & contractual agreements.
RECOMMENDATION 14	Employers to be advised of all learning, H&S, safeguarding requirements through either a bespoke employer handbook &/or contractual agreement. Such a document (electronic or hard copy) to be delivered against receipt to the employer or their SPOC as well acknowledgement that all requirements are understood & measures are in place prior to learners commencing their placement.
RECOMMENDATION 15	Providers should develop programmes of learning supporting the BV agenda, ensuring that this supports learners to develop a mature & appropriate appreciation of BV & equips them for life in our modern society. This should be appropriate to each level & age group of learner.
RECOMMENDATION 16	Providers should develop clear policies regarding learner absence & these should be communicated to employers. Guidance to those investigating such issues must identify potential signs of common vulnerability, when such matters should be escalated & what interventions should be considered.
RECOMMENDATION 17	Providers should ensure that effective systems exist to quickly link absence to existing safeguarding/Prevent concerns so that full & rounded decision making can be made by the provider's Designated Safeguarding Person (DSP).
RECOMMENDATION 18	The use of learner exit surveys is a useful tool to check on real life performance by both providers & employers. Analysis of such surveys is important to obtain broader picture understanding of issues across organisations.
RECOMMENDATION 19	Ensure effective systems are in place to flag learners leaving or completing their programme to safeguarding staff to allow the consideration of ongoing safeguarding implications & support to take place.
RECOMMENDATION 20	Providers ensure that their response to the Prevent Statutory Duty is embedded within their Safeguarding policy & that they have clearly established external referral procedures, taking into account the need to

	respond beyond local boundaries.
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## Associated Policies

- Safeguarding Policy
- Whistleblowing Policy
- British Values Policy

## Version Control

Version	Date	Author	Rational
0.1	18/12/2019	Judith Jackson	Drafted Policy
0.2	23/01/2020	Vicky Calik	Formatted and branded forms
1.0	10/02/2020	Judith Jackson	Policy Issued

*NB: Versions are 0.1, 0.2 etc until such point as the document is approved. Then it becomes version 1.0. Subsequent edited versions become 1.1, 1.2, or if it's a major update, 2.0*