

PREVENT DUTY POLICY

Document Owner		The Directors			
Implementation		This policy will be made available to all stakeholders.			
Communication		This policy will be communicated to all staff at induction. Copies of this policy are available electronically via the Policies and Procedures folder on the Everything Apprenticeships SharePoint Site. Stakeholders may request a PDF version of this policy which will be sent by email.			
VERSION	DETAILS INC. POLICY CHANGES		DATE	APPROVED BY	
1.0	First production		16/04/2024	Kerry Linley	
1.1	Policy review and refinement		26/04/2024	Kerry Linley	



1. POLICY STATEMENT

This document is the Prevent Duty Policy (the Policy) which outlines our commitment to safeguarding learners against the risks of radicalisation and extremism while participating in learning programs with Everything Apprenticeships (EA). The Policy delineates our collaboration with contractors, partners, and employers to ensure learners are adequately protected from such risks during their learning journey. It also sets out the actions EA will undertake, as well as those required of our contractors, partners, and employers, to adhere to the principles outlined in this Policy.

2. KEY TERMS

The following key terms define and clarify the terminology used throughout this Policy and serve to ensure that all readers have a clear understanding of the definitions.

Contractor(s)	An individual or group who provide services to EA, or on behalf of EA acting as if they were employed by EA.		
Coach tutor assessor	An individual or group employed by EA to plan, support and monitor apprentices ensuring clear objectives and alignment to the KSBs.		
Directors	The Directors of Rubitek Solutions Limited.		
Employers	Those organisations who employ learners and contract with EA to deliver training.		
Everything Apprenticeships	Everything Apprenticeships (EA) or the Company is a trading name of Rubitek Solutions Limited.		
Facilitator(s)	An individual or group employed by EA to guide and assist learner(s), either individually or in groups, during facilitated training sessions.		
Learner(s)	An individual or group including apprentices who attend facilitated learning sessions delivered by facilitators / coach tutor assessors.		
Senior Management	Individuals responsible for shaping the organisational culture, driving innovation, and ensuring effective leadership at all levels.		
Staff	Employees and any external consultants employed in any capacity by EA.		
Stakeholders	Individuals and groups of individuals who are detailed in this Policy.		



3. OBJECTIVES

The government Counterterrorism and Security Act 2015, places a duty on all education providers to have regard to the need to prevent people from being drawn into terrorism. This Prevent Duty forms part of the wider governments CONTEST counter terrorism strategy which sets out to:

- **Prevent terrorism** stop people becoming terrorists
- **Pursue terrorism** disrupt and stop terror attacks
- **Protect against terrorism** strengthen UK protection
- Prepare to deal with terrorism mitigate the impact of attacks that can't be stopped

As a national we continue to prioritise according to the threat posed to our national security; the allocation of resources will be proportionate to the threats we face. The current threat level to the UK from terrorism is **SUBSTANTIAL** which means an attack is likely. There has been an increase in far-right inspired terror attacks and lone acts of terror as opposed to mass organised terror activities, and the government strategy now includes ways. In which to identify risk of these instances.

The Prevent strategy has 3 specific aims:

- **Respond** to the ideological challenge of terrorism and aspects of extremism, and the threat we face from those who promote those views
- **Provide** practical help and support 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 need to be addressed, including the education sectors, criminal justice, faith groups, the internet, and health service

This policy seeks to ensure that EA meets the expectations and legalities of all legislation and that the organisation and staff play their role in ensuring everyone who engages with us is aware of and adopts a set of British Values and for promoting community cohesion.

This policy is shared with all staff when they commence employment with us and we seek written confirmation from them that they have read and understood the content, and that they agree to comply with it.

4. SCOPE

This policy applies to all potential and actual learners, staff, facilitators / coach tutor assessors, and any partners and associates of EA. The purpose of this policy is to ensure awareness of Prevent and provide a clear framework to structure and inform our response to potential radicalisation, including a supportive referral process for those who may be susceptible to the messages of extremism. To provide a framework to embed British Values into the curriculum and ways of work; and recognise current practice which contributes to the Prevent agenda as well as identify areas for improvement.



5. **RESPONSIBILITIES**

The Company is committed to fulfilling its Prevent duties by implementing measures to safeguard against radicalisation and extremism. We prioritise the safety and welfare of staff, learners, and all individuals impacted by our activities. This includes promoting a culture of awareness and vigilance, providing appropriate training and support, and collaborating with relevant stakeholders to mitigate risks and ensure a secure learning environment for all.

The Directors are responsible for fostering a culture of vigilance and compliance with the policy. They are responsible for ensuring that robust measures are in place to prevent radicalisation and extremism and that prioritise the safety and welfare of staff and learners. Additionally, the directors are committed to providing adequate resources and support to implement and uphold the Prevent policy effectively, fostering a safe and inclusive learning environment for all.

Other Stakeholders' Responsibilities:

- **Senior Management** is responsible for ensuring the implementation of the Prevent Policy and maintain partnerships with external agencies.
- Facilitators / coach tutor assessors and staff must actively uphold the principles outlined in this Policy and engage in mandatory Prevent training. In addition, they must be vigilant and proactive in identifying risks, and adhere to reporting procedures. Those involved in learning delivery are responsible for integrating British Values into the curriculum and promoting critical thinking and debate among learners to counter extremist narratives.
- **Learners, employers, and other stakeholders** have a responsibility to report any concerns in line with this Policy.

6. **DEFINITIONS**

The following are commonly agreed definitions with the Prevent Duty:

- An ideology is a set of beliefs.
- **Radicalisation** is the process by which a person comes to support terrorism and forms of extremism that may lead to terrorism.
- **Safeguarding** is the process of protecting vulnerable people, whether from crime, or other forms of abuse or from being drawn into terrorism related activity.
- **Terrorism** is an action that endangers or causes serious violence, damage or disruption and is intended to influence the government or to intimidate the public and is made with the intention of advancing a political, religious, or ideological agenda.
- **Vulnerability** describes factors and characteristics associated with being susceptible to radicalisation a vulnerable person is an individual classified within our safeguarding policy as a child or vulnerable adult.
- **Extremism** is 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.



7. INDICATORS

There are many signs and indicators of radicalisation and extremism, which are most commonly visible in individuals that are at higher risk of being targeted are those categorised as vulnerable. It is however important to note that anyone can be drawn into terrorism and therefore our culture of vigilance must be robust. Common indicators include:

- Identity Crisis: the learner is distanced from their cultural / religious heritage and experiences discomfort about their place in society.
- Personal Crisis: the learner may be experiencing family tensions; a sense of isolation; low self-esteem; they may have dissociated from their existing friendship group and become involved with a new and different group of friends; they may be searching for answers to questions about identity, faith and belonging.
- Personal Circumstances: migration; local community tensions and events affecting the learner's country or region of origin may contribute to a sense of grievance that is triggered by personal experience of racism or discrimination or aspects of Government policy.
- Unmet Aspirations: the learner may have perceptions of injustice; a feeling of failure; rejection of civic life.
- Experiences of Criminality: involvement with criminal groups, imprisonment, poor resettlement, or reintegration.
- Substance and alcohol misuse
- Peer pressure
- Influence: from older people or via the Internet.
- Bullying
- Domestic violence
- Race / hate crime

Behaviours and signs which may indicate an individual is at risk of being radicalised or exposed to extremist views could include:

- Being in contact with extremist recruiters and/or spending increasing time in the company of other suspected extremists.
- Loss of interest in other friends and activities not associated with the extremist ideology, group, or cause.
- Accessing extremist material online, including through social networking sites.
- Possessing or accessing materials or symbols associated with an extremist cause.
- Using extremist narratives and a global ideology to explain personal disadvantage.
- Voicing opinions drawn from extremist ideologies and narratives, this may include justifying the use of violence to solve societal issues.
- Graffiti symbols, writing or artwork promoting extremist messages or images.
- Significant changes to appearance and / or behaviour increasingly centred on an extremist ideology, group, or cause.
- Changing their style of dress or personal appearance to accord with the group.
- Attempts to recruit others to the group/cause.
- Using insulting to derogatory names for another group.

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An increase in prejudice-related incidents committed by the individual may include:

- Physical or verbal assault
- Provocative behaviour
- Damage to property
- Derogatory name calling
- Possession of prejudice-related materials
- Prejudice related ridicule or name calling
- Inappropriate forms of address
- Refusal to co-operate
- Attempts to recruit to prejudice-related organisations

8. BRITISH VALUES

All EA staff, facilitators / coach tutor assessors will demonstrate British Values throughout their interactions, behaviour, and professional practice. We understand the requirement to embed British Values into and throughout the apprentice program. Additional enhancement activities developed centrally will be shared with learners across all curriculum areas to support knowledge and understanding of British Values.

9. INDUCTION AND TRAINING

9.1 FOR STAFF

EA provides training to ensure all staff, facilitators / coach tutor assessors and other associates and partners have the necessary skills, knowledge, and experience to assist them in the exercise of their duties in line with this Policy.

Prevent training is provided to all staff as part of their induction and periodically as part of their mandatory training, in accordance with our Professional Development Policy, along with access to relevant training resources and ongoing legislative updates. This training will ensure that staff develop their understanding of the signs and indicators of abuse, neglect, bullying and / or harassment, and that they know how to respond to an individual that discloses any concern covered by this Policy. All staff will undergo annual refresher training.

All staff are required to complete the following training so that they know what Prevent is and what signs to look for when it comes to risks of radicalisation:

Course 1: <u>Awareness</u>

Annual refresher course: Refresher Awareness

The DSL is required to complete the following training so that they know how to make a Referral and how the Prevent programme helps those at risk of radicalisation.

Course 2: Referrals

Course 3: Channel or Prevent Multi-Agency Panel (PMAP)

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9.2 FOR LEARNERS

Learners are given Prevent awareness training including Equality and Diversity and British Values as part of their induction to the apprenticeship program. This includes reporting procedures so that learners understand how and when they can raise a concern about themselves or someone else.

During tripartite reviews, EA staff discuss Prevent, Equality and Diversity and British Values to enhance knowledge and awareness and identify and address any concerns, as well as promote resilience among learners to extreme narratives.

10. TEACHING, LEARNING AND ASSESSMENT

All EA programs will provide a broad and balanced curriculum, delivered by skilled professionals, so that learners are enriched, understand, and become tolerant of difference and diversity and to ensure that they thrive, feel valued and not marginalised. Our teaching and learning programs promote respect, tolerance, and diversity.

Learners are encouraged to share their views and recognise that they are entitled to have their own different beliefs which should not be used to influence others. We also aim to build learner resilience to radicalisation by promoting fundamental British values and enabling them to challenge extremist views.

It is important to emphasise that we will not stop students debating controversial issues. We will provide a safe space in which our learners and staff can understand the risks associated with terrorism and develop the knowledge and skills to be able to challenge extremist arguments. We will also ensure learners are safe from terrorist and extremist material when accessing the internet by establishing appropriate levels of filtering during our training sessions.

11. REPORTING A RADICALISATION CONCERN

A learner who displays one or a few vulnerabilities and indicators of concern is not necessarily at risk of radicalisation but may be. In all cases, staff should report a concern to the Designated Safeguarding Lead (DSL). All radicalisation concerns are also safeguarding concerns, and all stakeholders should follow the reporting process outlined in the EA Safeguarding Policy. This includes but is not limited to the following actions:

- Immediately report concerns to the DSL
- Document the concern using the established reporting form

The Designated Safeguarding Lead (DSL) will assess the concern and decide the most appropriate action and / or referral to external agencies including escalation where necessary to the local authority Prevent lead and local policing teams. Details for these partners are listed in the EA Safeguarding Policy.



11.1 MAKING A PREVENT REFERRAL

The DSL who is responsible for making all Prevent referrals must describe in the referral:

- How or why, EA came to be concerned
- What happened if there was a specific event
- The indicators that something is wrong
- Details of any sympathetic interests (e.g. hate crimes, extremism, or terrorism)
- Worrying use of mobile phone, internet, or social media
- Contact with groups or individuals that cause concern including who and how often, and why they are a cause for concern
- Any expressing of wanting to cause physical harm, or threats of violence, including who
 to, when and what was said or expressed
- Any additional need, disability or special educational need or learning support requirement, including what they are and if they're known or suspected
- Any other safeguarding concerns about the individual, family, peer group or environment
- Any discussions that have taken place with the learner (or their parent / carer if under 18) to date
- Details about parental or carer support (if known and the learner is under 18)
- Why the referral is relevant to Prevent
- What the concern is, what may happen if the learner's needs are not met and how this will affect them

Any individual who is subject to a referral should be told, unless doing so will place them at more risk of harm. Where they are told, it is important that the individual understands that a referral is not a criminal intervention and that it is designed to ensure they are given support.

The police screen all reports of radicalisation to check whether individuals are / should be part of a terrorism investigation as these individuals are not appropriate for Channel support.

11.2 CHANNEL

Channel is a voluntary, confidential support programme which uses a multi-agency approach to identify people at risk of being drawn into terrorism based on an assessment of their vulnerability.

Where a Prevent referral is made, the Channel panel which is chaired by the Local Authority and attended by other partners including representatives from education and health services will meet to discuss the referral. Further information about the initial assessment process and the Channel programme including how an individual is supported or referred to other agencies if they are deemed not suitable for Channel can be found online here.

If the Channel panel decides the referral is not appropriate for Channel support or other safeguarding services, it will signpost it back to the education setting. The Channel panel will list areas of concern and the learner's vulnerabilities and may suggest how EA might deal with these. The local authority Prevent lead and local policing teams can provide further advice.

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If the Channel panel decides the referral is appropriate for support, it will design a support package for the learner based on the risks and vulnerabilities identified. This support is tailored to the learner. The DSL can attend the Channel panel to be part of this process.

Participation in the Channel program is confidential. Parents and carers need to give their consent if the learner is under 18.

The Channel panel will review the progress of the learner each month, and when the panel decides there is no more risk of radicalisation, the learner will leave the program.

11.3 SUPPORT FOR STAFF

EA provides comprehensive support for staff and learners in navigating Prevent-related challenges, ensuring they are equipped with the knowledge and resources to address safeguarding concerns effective and understand the expected process.

12. RECORDS

EA will maintain clear, comprehensive records of any disclosures under this policy including any referrals. The company will comply with the requirements of the Data Protection Act 1998, which allows for disclosure of personal data where this is necessary to protect the interests of a learner. Information should be accessible only to those who need to access it as part of further investigation or any action necessary.

13. CONFIDENTIALITY

All matters relating to welfare and safeguarding are highly confidential. EA will only disclose information, both internally and externally, on a 'need to know' basis. Records and referral details will be made and stored on electronic systems accessible by the Designated Safeguarding Lead and classified as Confidential.

14. WHISTLEBLOWING

Everyone has the right, and a responsibility, to raise concerns about the behaviour of staff, learners, volunteers, or other stakeholders when such behaviour may be harmful to others in their care and will receive appropriate support from us when doing so. All stakeholders are encouraged to share any concerns they may have so that problems can be identified, dealt with, and resolved quickly without prejudice to their position. Further information on Whistleblowing can be found in the Whistleblowing Policy.



15. PROMOTING THIS POLICY AND GAINING COMMITMENT

We are committed to ensuring that all staff and wider stakeholders fully understand, comply with, and actively engage with our policies. Our board and senior management are dedicated to fostering a culture of policy adherence and continuous improvement across our organisation.

Our induction process ensures that new staff members are introduced to our policies from the outset, providing them with the necessary information and guidance to adhere to our standards. Additionally, our annual appraisal process includes a thorough review of staff implementation of our policies, recognising and celebrating successes while identifying areas for improvement.

EA considers staff and wider stakeholder insights and perspectives when refining and reviewing its policies. This ensures our policies remain relevant, effective, and responsive to the evolving needs of our organisation and stakeholders. In addition, we proactively seek out examples of best practices from exemplar training providers, incorporating learnings and insights to further enhance our policies. By continuously benchmarking against industry standards and embracing innovative approaches, we strive to maintain the highest standards of policy governance and effectiveness.

16. APPLICABLE LAWS, REGULATIONS AND OTHER POLICIES

This Policy has been written in line with the following legislation and regulations:

- Counter Terrorism and Security Act 2015 / Counter Terrorism and Border Security Act 2019
- Prevent duty guidance: England and Wales (2023)
- DfE Guidance on the Prevent Duty
- Ofsted FE and Skills Education Inspection framework in England
- Inspecting safeguarding in early years, education, and skills settings

and should be read in conjunction with other EA Policy documents.

17. APPROVAL AND REVIEW

The Directors are responsible for ensuring the Company meets its obligations in line with this policy.

This policy shall be reviewed by the Directors and updated where necessary before being approved at least annually to ensure that it (and any subsidiary policies and procedures) remains appropriate considering any relevant changes to the law, organisational policies, or contractual obligations.

This policy is approved by Kerry Linley (Director) on 26th April 2024.

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26th April 2024