



## Prevent Policy

### Document Control

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### Policy Statement:

Prevent is a fundamental aspect of safeguarding and is one of the four elements of the UK's Counter Terrorism Strategy (CONTEST)

The Counter Terrorism Strategy (CONTEST) aims to reduce the risk posed by terrorism, the 4 Ps of CONTEST which underpin the strategy are:

- 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 a terrorist attack

### CONTEST Strategy 2018

The Prevent Duty is focussed on the element of prevention and has 3 clear aims, which are:

- 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.
- Revised Prevent Duty Guidance England & Wales, updated April 2021

TKO have a legal responsibility to fulfil the Prevent duty and are committed to creating and maintaining a safeguarding culture. This policy details how TKO 'have due regard, in the exercise of its functions, to the need to Prevent people from being drawn into terrorism'.

### *Counter Terrorism & Security Bill*

This Prevent policy must be read alongside TKO Safeguarding Policy.

#### **Key Terms:**

- Extremism: is the vocal or active opposition to our fundamental values, including democracy, the rule of law, individual liberty and the mutual respect and tolerance of different faiths and beliefs. This also includes calling for the death of members of the armed forces

- Radicalisation: refers to the process by which a person comes to support terrorism and extremist ideologies associated with terrorist groups

- 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 or 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

### *Keeping Children Safe 2021*

#### **Scope:**

This policy relates to all potential and actual staff, apprentices, trainees, learners, colleagues, volunteers, subcontractors and partners at TKO.

This policy relates to all forms of terrorism including non-violent extremism.

Examples of terrorism include right wing extremists, animal rights, ecoterrorism, cyber terrorism, Al-Qaeda & allied groups, ISIS / ISIL / IS.

#### **Legislation:**

- [Counter Terrorism & Security Act 2015](#)
- [The United Kingdom's Strategy for Countering Terrorism \(June 2018\) CONTEST 3](#)
- [Prevent Duty](#)
- [Prevent Duty Guidance for Further Education in England & Wales, updates April 2021](#)
- [Keeping Children Safe in Education 2021 \(p132 to 135\)](#)

#### **Requirements of Prevent**

The Prevent duty requires further education providers to:

- Work in partnership with and actively engage with external partners, including community organisations, local support agencies, the police and Channel.
- Make sure colleagues have undertaken appropriate training and share information across curriculum areas.

- Have clear and visible policies for colleagues and apprentices/learners regarding risk assessment, including policies for events that may take place by colleagues, learners, visitors, external bodies and community organisations.
- Have an awareness of places or areas of learning where apprentices/learners / colleagues may be in contact with, or possibly get involved with, terrorism.
- Have sufficient support available for welfare and pastoral care according to the individual's requirements. Including guidance and policies on the use of prayer rooms or other faith related facilities and issues that may occur from the use of these facilities.

#### **Our Objectives:**

- To ensure safety of all learners, potential learners, colleagues and visitors
- To protect learners and employees from radicalising influences
- To promote TKO mission, vision and values.
- To promote and embed British Values into policies, procedures and throughout the learner's curriculum.
- To create a Prevent risk assessment and action plan which is regularly reviewed and updated to ensure our duties under PREVENT are met.
- To ensure all apprentices/learners, colleagues and subcontractors are aware of their responsibilities in preventing violent extremism and radicalisation.
- To ensure that TKO promotes a culture of non-bullying, non-harassment and nondiscrimination.
- To provide support for learners and potential learners who might be at risk or vulnerable to risk by following TKO's safeguarding procedures, including the Channel referral process.
- To promote the [Run, Hide, Tell](#) campaign to all learners, visitors & subcontractors.

#### **British Values:**

All colleagues at TKO will exemplify British Values throughout their interactions, behaviour and professional practice.

TKO understand the requirement to embed British Values into and throughout the learner's curriculum.

Curriculums across all delivery areas will embed appropriate opportunities throughout the learners learning journey with TKO.

The British Values are:

- Democracy
- The rule of law
- Individual liberty
- Mutual respect and tolerance of those with different faiths and beliefs Additional enhancement courses that are developed centrally will be shared with learners across all curriculum areas to support knowledge and understanding of British Values.

## **Roles & Responsibilities:**

For a detailed overview of roles and responsibilities please refer to TKO's Safeguarding policy.

The Board at TKO have ultimate responsibility for Safeguarding & Prevent.

The Managing Director is responsible for leading on TKO's Safeguarding and Prevent policy and strategy and) are responsible for embedding.

Our Safeguarding Team are responsible for implementing TKO's Safeguarding and Prevent policy and making sure that concerns are shared with the relevant external organisations / agencies, in order to minimise the risk of learners and colleagues becoming involved in terrorism.

All Total People colleagues are responsible for:

- Attending all mandatory safeguarding and Prevent training and keeping up to date with current policy and procedures.
- Understand what may contribute to increased vulnerability in relation to radicalisation and extremism.
- To understand the signs and indicators that may cause concern.
- To remain observant and vigilant to identify concerns.
- To share concerns following TKO's Safeguarding procedures.

In addition, all delivery colleagues are responsible for:

- Planning appropriate opportunities throughout the learner's curriculum, with employer involvement (where possible / relevant) to fully embed British Values.
- To develop learners understanding of terrorism and extremism, to support learners to protect themselves and others, and to have the confidence and resilience to be able to share their concerns.
- Be able to confidently challenge extremist ideology in a way which supports learner's education.
- Check employer's awareness of TKO's procedures in relation to Prevent and safeguarding.

## **Employers (where applicable in supporting learners into work):**

- To understand their responsibilities in relation to Prevent.
- Take part in apprentices/learner / employer induction.
- Read TKO's published policies including
  - Prevent
  - Safeguarding
  - Equality Diversity & Inclusion
  - Health & Safety
- Actively engage in regular tri-party reviews with learners and their Learning Coach. • Report any concerns they have following TKO's procedures.

## **Subcontractors are responsible for:**

- Full compliance with TKO's due diligence process.

- Full compliance with TKO's policies in relation to safeguarding and Prevent.
- Following TKO's safeguarding reporting procedures

### **Training to implement the Policy:**

#### **Colleagues:**

Mandatory training to implement this policy is provided for all TKO's colleagues this is reviewed and updated annually, this includes several annual Virtual modules.

- Virtual module - Equality, Diversity and Inclusion
- Virtual module - Understanding Pathways to Extremism and the Prevent Programme
- Virtual module - Level 1 Safeguarding Children & Adults
- Virtual module - Safer Recruitment

#### **Subcontractors:**

TKO require subcontractors to provide effective safeguarding and Prevent training and on-going CPD for all their employees, TKO monitor through due diligence and regular monitoring activity.

In addition to this TKO require any subcontractors and relevant employees to complete the following ETF training modules.

- Safeguarding in adults or children where applicable
- Safer Recruitment – anyone with a responsibility for recruitment
- Prevent – course to be determined by role – Prevent for Subcontractors and Prevent for Practitioners.

#### **Promoting and gaining Commitment to the Policy:**

TKO will ensure that this Prevent Policy is promoted, and commitment gained via the following activities. This is not an exhaustive list, as other mechanisms will be used as and when the situation arises.

This policy will be agreed by the TKO board of governors with promotion and commitment to this policy gained through:

- Staff induction/Training/CPD/Online learning modules
- Intranet section on safeguarding and prevent, and what it means for staff and apprentices/learners
- Visible media in and around office and employer locations
- Learning resources for all learners
- Email headers and footers
- Learner reviews – carried out on a 6-weekly basis. We will ensure that we gain and measure the promotion and commitment within TKO to this Prevent Policy by:

- Monitoring the outcomes from online and interactive training for both staff and learners
- Staff and learners where applicable will be asked to sign that they have seen and understood relevant training and updates
- Managers will produce evidence (e.g. meeting notes) staff training and 1-2-1 reviews, that this policy has been discussed
- Monitoring of learner review documentation
- Monitoring specific responses to safeguarding and prevent in learner and employer (where applicable) surveys
- Through our use of internal quality checks and reviews and through audits checks.

#### **Learners:**

Safeguarding and Prevent awareness training including Equality, Diversity and Inclusion and British Values are covered at during learner inductions where applicable.

During induction TKO's reporting procedures are explained to learners so they can raise a concern about themselves or someone else.

Regular 8 weekly Progress Reflections are carried out, these are tri-party reviews between the learner, TKO's Learning Coach and the employer (where applicable).

Progress Reviews are used to raise awareness of Prevent, EDI and Safeguarding topics and to contextualise to the learner's workplace and experiences. In addition to embedded activities throughout the learner's curriculum there are centralised enhancement courses that are provided.

Enhancement courses cover a wide range of subjects designed to enhance personal development and maximise opportunities to reflect on current news stories and events.

Examples of courses that have been created in response to current events or hot topics include:

- Civil Rights6 Page
- Democracy and Elections
- Pride Month
- Online Security and Risks

#### **Vulnerabilities, Signs and Indicators**

Throughout colleague training such as Virtual College CPD accredited courses, ETF training modules and on-going updates through forums held via TKO.

All TKO's colleagues are trained to understand factors that may make an individual vulnerable and the signs and indicators to look for that may be a cause for concern. This training covers examples such as ...

#### **Vulnerabilities:**

It is important that all colleagues recognise factors that may contribute to someone becoming more vulnerable to radicalisation and extremism. Examples of some of these vulnerabilities include:

- Period of transition

- Social isolation
- Age / naivety
- Addiction
- Poor education
- Mental Health issues
- Developmental disorder
- Economically disadvantaged

Understanding the factors that may push someone or pull someone towards radicalisation is important, but so too is understanding that these factors can be part of anyone's daily life and do not mean someone is at risk.

**Pull factors to be aware of:**

- Ideological attraction
- Sense of belonging
- Charismatic recruiters
- Adventure
- Romance
- Excitement
- Liking violence
- Rebellion
- Ego
- Sense of mission

**Push factors:**

- Racism
- Poverty
- Alienation
- Humiliation
- Sense of belonging
- Sense of mission
- Charismatic recruiters
- Trauma
- Injustice

- Ideological attraction

#### **Possible signs & indicators:**

- Depressed / withdrawn / isolated
- Feeling under threat
- Being influenced or controlled by a group
- Desire for political or moral change
- Need for identity, sense of meaning / belonging
- Mental Health issues
- A desire for status / a need to dominate others and control
- Change of appearance
- Feelings of injustice

These are possible signs to consider, it is not an exhaustive list and people may reflect many of or all these signs but not be at risk.

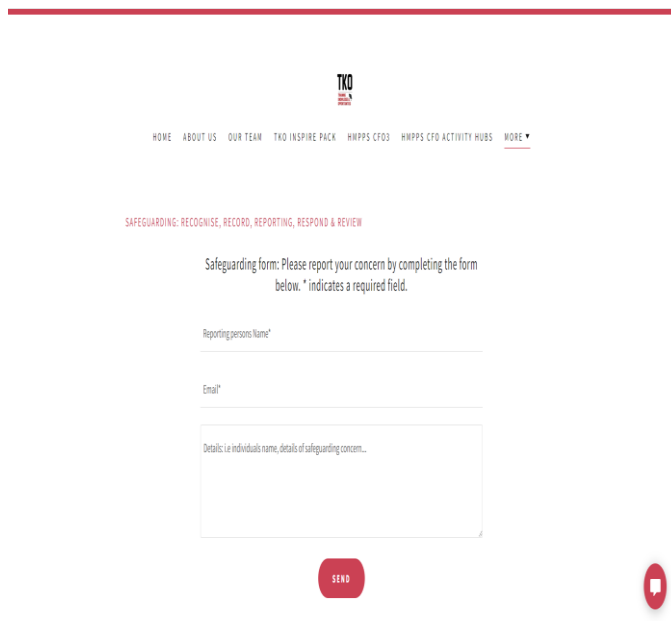
#### **Referral process:**

All TKO's colleagues, employers and subcontractors have a duty of care to share their concerns.

The reporting process is simple, and the relevant form can be found on TKO's Website.

Visit the TKO website, click **More** and select **Safeguarding** then select Report a Concern:

<https://tkoconsulting.co.uk/safeguarding>



The screenshot shows the TKO website's safeguarding form. At the top, the TKO logo is centered. Below it is a navigation menu with links: HOME, ABOUT US, OUR TEAM, TKO INSPIRE PACK, HWPPS CFO, HWPPS CFO ACTIVITY HUBS, and MORE (with a dropdown arrow). Underneath the menu, the text 'SAFEGUARDING: RECOGNISE, RECORD, REPORTING, RESPOND & REVIEW' is displayed. The main heading for the form is 'Safeguarding form: Please report your concern by completing the form below. \* indicates a required field.' The form contains three input fields: 'Reporting person's Name\*' (a text box), 'Email\*' (a text box), and 'Details (i.e. individual's name, details of safeguarding concern...)' (a larger text area). At the bottom of the form is a red 'SEND' button. A small red speech bubble icon is visible in the bottom right corner of the form area.

Guidance on Counter Terrorism can also be found via:

<https://tkoconsulting.co.uk/prevent-counter-terrorism>



If someone is at immediate risk of serious harm, then this should be reported to the police – 999 and TKO's reporting procedures followed.

TKO's safeguarding policy and procedure for reporting concerns will be shared with learners and employers where applicable as part of induction and throughout their programme.

#### **Concerns about colleagues:**

Where a concern is about a TKO colleague then this will be reported to our Richie Ellison via email [richie@tkoconsulting.co.uk](mailto:richie@tkoconsulting.co.uk)

Richie Ellison will link in with the relevant member of the Safeguarding Team as required.

If the concern was relating to HR then this would be reported directly to Richie Ellison via [richie@tkoconsulting.co.uk](mailto:richie@tkoconsulting.co.uk)

#### **External Speakers & Events:**

External speakers and events at TKO are subject to a risk assessment.

The risk assessment is completed by the person / people arranging the event and must be approved by TKO's Safeguarding Team before the visit / speaker can be confirmed.

#### **Links to policies:**

- TKO's Equality Diversity and Inclusion Policy
- TKO's Health and Safety Policy
- TKO's LTE Acceptable Use Policy (internal only)
- TKO's Data Protection Policy

#### **Channel and Escalation:**

Where the safeguarding procedure has been followed and needs escalating further, then this could possibly result in TKO contacting the local Counter Terrorism Unit or Channel.

Channel provides a multi-agency approach to early support. Through Channel individuals at risk are identified, the risk assessed, and a plan of support developed. Consent is not required to make a referral to Channel but consent from the individual is required to be able to provide and implement a support plan.

TKO will not hesitate to make a Channel referral where it is deemed appropriate and will work with all agencies involved to implement the support plan.

#### **Continuous Improvement**

Please refer to the TKO Safeguarding Policy. In addition to this TKO's Prevent Risk Assessment contributes to the on-going evaluation and improvement of practice.

#### **Signatures & Review:**

This Policy will be published on TKO's internal Hub, the TKO website and links made in the colleague induction, as well as the commitment statement that is completed with employers at the start of programme. This policy will be updated annually as a minimum.

**Signed:**

A handwritten signature in black ink, appearing to read 'R. Ellison', with a small horizontal line underneath.

**Name:**

Richie Ellison, Director, TKO