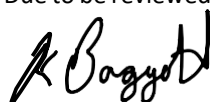
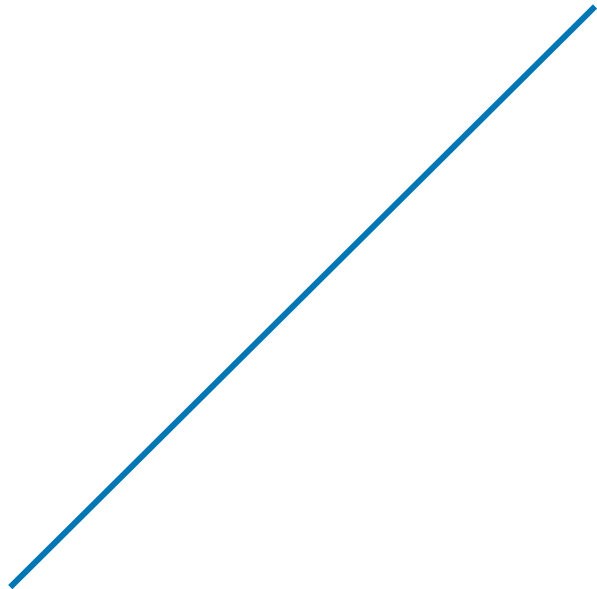


# Prevent Policy

Version 8  
Reviewed Aug 23  
Due to be reviewed Aug 24

A handwritten signature in black ink, appearing to read 'A. Baggett'.

## **PART 1 : PREVENT**

### **1. Introduction**

1.1. The threat to the UK from international terrorism is substantial. The terrorist threat that we now face is more diverse than ever before, dispersed across a wider geographical area and often in countries without effective governance. We therefore face an unpredictable situation.

1.2. Dealing with violent extremism is nothing new. Throughout history there have been groups prepared to use violence to achieve their aims. A small minority of these seek to radicalise young people with an ideology which justifies the use of violence through a distorted interpretation of a set of values, often associated with a religion.

1.3. In line with guidance from the Department for Education (DFE), Learning Skills Partnership (LSP) has a zero-tolerance acceptance of extremist behaviour and ensures that our care, guidance, and curriculum empower young people to reject violent or extremist behaviour.

1.4. Whilst it remains very rare for all learners to become involved in extremist activity, any learner can be exposed to extremist influences or prejudice views, including via the internet, from an early age. Early intervention is a preferable way of tackling extremism. This approach applies equally to staff in the organization who may also be at risk of, or exposed to extremist influences or prejudice views.

### **2. Definitions**

2.1. Extremism is defined as:

“Vocal or active opposition to fundamental British values, including democracy, the rule of law, individual liberty and mutual respect and tolerance for those with different faiths and beliefs. We also include in our definition of extremism calls for the death of members of our armed forces, whether in this country or overseas.”

2.2. For the purposes of this policy, any references to **adult at risk** should also be deemed to refer to individuals who have reported extremism or who have been the subject or target of extremism.

### **3. Risk Assessment and Action Plan**

3.1 As required by the Prevent Duty, we carry out assessments of the risk of our students being drawn into terrorism. This risk assessment and action plan is reviewed at least annually by the Directors where any significant risk is identified we will consider what action might mitigate the impact/likelihood of that risk crystallising, and if necessary, include it in the LPS's Prevent Action Plan.

3.2 LSP will carry out an annual risk assessment. This helps to evaluate where and how customers or staff may be at risk of being drawn into terrorism. This will include reviewing policies regarding the delivery of learning, student welfare, equality and

diversity, and the safety and welfare of customers and staff.

3.3 We will ensure that there is a shared understanding amongst staff and learners as to the risks posed within the training environment of extremist behaviour by raising awareness through training and information sharing.

3.4 Steps will be taken to mitigate the risk posed to staff/learners by individuals vulnerable to extremism on a case by case basis

3.5 Referrals to Channel programme will be made on a case and with consideration being made to the need for a multi-agency approach in advance of any referrals.

3.6 Further risk assessments will be carried out any time LSP premises are used for events held by staff, customers or visitors, external bodies, community groups or partners.

i. Risk assessments will be undertaken on any external speakers and clear guidance will be issued as to levels of acceptable behaviour whilst on site.

3.7 All display materials, include externally produced leaflets and posters, will promote fundamental British values, and have due consideration to the Equality Act.

3.8 LSP will only promote its service within organisations that share its values for the need to safeguard, promote equality and prevent extremist behaviour. Where required risk assessments will be undertaken to consider the appropriateness of venues before agreements are made to provide information and advice to individuals within that organisation.

## 4 Strategies for Preventing Extremism

4.1 The office for security and counter terrorism works to counter the threat from terrorism and their work is detailed in the counter terrorism strategy CONTEST. This strategy is based on four areas of work:

- 4.1.1 Pursue – to stop the terrorist attacks
- 4.1.2 Prevent – to stop the people becoming terrorists or supporting terrorism
- 4.1.3 Protect – to strengthen our protection against terrorist attacks
- 4.1.4 Prepare – to mitigate the impact of a terrorist attack

## 5 Aims

5.1 At LSP we follow principles which seek to:

Raise awareness to all learners and colleagues of the threat from violent extremist groups and the risks. Provide information about what can cause violent extremism, about preventative actions taking place locally and nationally and where we can get additional information and advice.

Help learners and colleagues to understand the positive contribution they can make to empower themselves to create communities that are more resilient to extremism and protecting the wellbeing of particular learners or groups who may be vulnerable to being drawn into violent extremist activity.

Provide advice on managing risks and responding to incidents locally, nationally, or internationally that might have an impact on the learning environment.

5.2 LSP will use these principles to guide our work in all areas including building on our work in:

- 5.2.1 Promoting 'every learner matters' outcomes for each learner
- 5.2.2 Promoting learner wellbeing, equalities, and community cohesion
- 5.2.3 Building the resilience of LSP, working with partners to prevent the learners becoming victims of harm
- 5.2.4 Working with other agencies and parents to support the wellbeing and welfare of our learners
- 5.2.5 Ensure that British values are exemplified and understood across the organisation

## 6 Possible signs of radicalisation

6.1 According to the Anti-terrorism prevent toolkit, potential signs of radicalisation include:

- The individual's views become increasingly extreme regarding another section of society or government policy
- They are observed downloading, viewing, or sharing extremist propaganda from the web
- They become withdrawn and focused on one ideology
- The individual becomes increasingly intolerant of more moderate views

- The individual may change their appearance, their health may suffer (including mental health) and they may become isolated from family, friends, peers, or social groups.
- The individual expresses a desire/intent to take part in or support extremist Activity

## [Prevent Duty Toolkit](#)

### **7 Objectives**

7.1 As part of LSP to safeguarding, equality and diversity and the promotion of British values, we will ensure that all staff have the confidence to recognise the signs that a learner or colleague is at risk of radicalisation. We do all this by:

- i. Promoting fundamental British values and by ensuring that there is a culture of openness within all delivery and teams.
- ii. Challenging segregation, promoting cohesion, and building learner resilience with the aim of our learners and staff contributing actively to wider society.
- iii. Operating a clear and consistent anti-bullying approach which challenges harassment and discriminating and enables learners and staff to feel safe and supported.
- iv. Providing support, advice and guidance for learners and staff who may be at risk. This may include referral to channel, the process by which multi agency support is provided to individuals who are at risk of being drawn into terrorism.
- v. Ensuring that staff, learners, and employers are aware of their roles and responsibilities in preventing radicalisation and extremism.
- vi. Having a leadership team which actively promotes the core values of shared responsibilities and well-being for learners and staff and ensures and these are at the centre of everything that we do.

### **8 Accountable and responsibilities**

8.1 All staff should be vigilant to extremist's behaviour as a wider part of their safeguarding duties and report their concerns to the Safeguarding Officer

### **9 Teaching and learning**

9.1 A curriculum that promotes fundamental British Values with the view to encourage learners and staff to participate in their local communities and use their voice to make positive changes will be provided.

9.2 Fundamental British Values involve people showing tolerance and respect for the rights of others. It also enables learners and staff to distinguish the difference between right and wrong, to also encourage them to respect the civil and criminal law of England. Tolerance and harmony are promoted between different cultures. This is done so that learners and staff show appreciation and respect for others and their own cultures.

9.3 LSP will take every available opportunity to match curriculums to local priorities whilst offering learners the opportunity to develop critical thinking skills.

9.4 Using topical and relevant examples to stimulate thinking LSP will actively tackle discrimination.

## **10 Use of monitoring of IT**

10.1 IT equipment provided to both staff and learners is subject to monitoring of its use. In addition to monitoring, filters are applied to restrict access to harmful content and prevent people from being drawn into extremist behaviour.

10.2 Inappropriate use of IT facilities that appears to be in breach of the Prevent policy must be reported to the Safeguarding officer.

10.3 LSP is Cyber Essential accredited Oct 23

## **PART 2: GENERAL PROVISIONS**

### **11 Reporting an Allegation**

11.1 Any suspicion, allegation or incident relating to Safeguarding or Prevent must be reported to the designated Safeguarding Officer within 24 hours.

11.2 All reports must be reported to your Line Manager and the designated Safeguarding Officer.

11.3 If the Line Manager and the designated Safeguarding Officer are not available, reports must be reported to the Directors. The purpose of reporting is to raise awareness and to ensure that staff members are dealing with the allegation appropriately and in line with company procedures.

### **12 Responding to an Allegation**

12.1 When responding to an allegation **DO**:

- Make sure the individual is safe
- Assess whether emergency services are required and if needed call them
- Offer support and reassurance
- Ascertain and establish the basic facts
- Make careful notes and obtain agreement on them. Ensure notation of dates, time and persons present are correct and agreed
- Follow correct procedure
- Explain areas of confidentiality; immediately speak to your Line Manager for support and guidance
- Take all necessary precautions to preserve forensic evidence, if applicable
- Explain the procedure to the individual making the allegation
- Remember the need for ongoing support.

12.2 Do **NOT**:

- Confront the alleged abuser or extremist individual
- Be judgmental or voice your own opinion
- Be dismissive of the concern
- Investigate or interview beyond that which is necessary to establish the basic facts
- Disturb or destroy possible forensic evidence
- Consult with persons not directly involved with the situation
- Ask leading questions
- Assume information
- Make promises
- Ignore the allegation
- Elaborate in your notes
- Panic

12.3 It is important to remember that the person who first encounters a case of alleged abuse or extremism is not responsible for deciding whether abuse or extremism has occurred. This is a task for the professional adult protection agencies or Prevent channel panels, following a referral from the designated Safeguarding Officer.

### **13 Allegations against Staff**

13.1 Where an allegation concerns the actions of a member of staff (who may also be colleague) it is the clear duty of all those concerned to report the matter as set out above.

13.2 LSP **Whistle blowing Policy** also sets out clear reporting procedures for unethical or improper conduct. When it comes to raising Safeguarding or Prevent concerns, no distinction should be made between staff and other persons. The wellbeing of children, adults at risk, staff and other customers is paramount.

13.3 It is important to ensure that the action taken:

- Protects the rights and wishes of the child or adult at risk
- Protects the rights of the member of staff concerned
- Enables managers to take appropriate action either on behalf of the child / adult at risk or against the staff member where appropriate; and
- Does not compromise any criminal investigation.

13.4 Any member of staff who is alleged to have had an inappropriate relationship with a customer will be suspended whilst an investigation is carried out. On completion of investigation written records for any member of staff who is found to be innocent must be destroyed immediately.

### **14 Reporting Safeguarding & Prevent**

14.1 It is important that any issues relating to Safeguarding or Prevent are reported promptly, accurately, and as comprehensively as possible.

14.2 Data protection guidelines should be observed when recording sensitive information. All recorded information should be handled sensitively, and all conventions of confidentiality must be adhered to at all times.

#### **Safeguarding Disclosure Form**

14.3 If a child or adult discloses to you that they are being harmed, you must complete the **Safeguarding Disclosure Form** within 24 hours. The disclosure form should be completed as fully and as much in the words of the person.

14.4 Similarly, if you, an employer, or colleague directly experiences or witnesses extremism, the procedure above should be followed.

14.5 This recording can be done in conjunction with the designated Safeguarding Officer if required.



## Safeguarding Concern Form

14.6 If you believe there may be issues in respect of Safeguarding or Prevent but do not have direct witness testimony or explicit disclosure, the Safeguarding Concern Form should be completed. Examples of when to use this include:

14.6.1 if you have a concern that a child or adult may be harmed

14.6.2 if you have a concern that a member of staff or other adult is behaving inappropriately

14.6.3 If you have a concern that a customer or employee may be at risk of extremism

14.7 This form should be completed fully and with as much detail as possible and forward immediately to the Safeguarding Officer.

## 15 Referring Information within LSP and to External Agencies

15.1 Information should be referred within LSP Training to the designated Safeguarding Officer. No information should be referred to an external agency by any staff member other than the designated Safeguarding Officer or a member of the Senior Management Team. On receiving information relating to a concern about a child or adult the Safeguarding Officer will undertake consultation in order to be able to make a decision as to appropriate action.

15.2 Three decisions may be made:

- **No further action required** – concerns have been allayed but written documentation regarding the concern and the reasons for no further action being taken will be kept.
- **Continued monitoring of the situation** – concerns have not been fully allayed. However continued monitoring of the situation is required. Involved parties will continue to listen, observe, record, consult and report.
- **Formal referral** – referral will be made to the most relevant agency by the Safeguarding Officer.

15.3 If the decision is formal referral, the designated Safeguarding Officer shall telephone and report the matter to the appropriate local Safeguarding Officer or regional Prevent Coordinator, as appropriate. They may also engage with other appropriate external agencies, as set out below.

15.4 A written factual, record of the date and time of the report shall be recorded on the Safeguarding Report form, including the name and position of the person to whom the matter is reported. The report must be confirmed in writing to the relevant referral body within 24 hours.

## 16 Confidentiality

16.1 Vulnerable adult protection raises issues of confidentiality which should be clearly understood by all. Similarly, reports of extremism also raise significant issues of confidentiality. The following guidelines apply to Safeguarding issues in respect of children, adults at risk and Prevent.

- 16.2 Staff have a professional responsibility to share relevant information about the protection of vulnerable adults with other professionals, particularly investigative agencies and adult social services. Clear boundaries of confidentiality will be communicated to all.
- 16.3 All personal information regarding a vulnerable adult will be kept confidential. All written records will be kept in a secure area for a specific time as identified in data protection guidelines.
- 16.4 Records will only record details required in the initial contact form.
- 16.5 If a vulnerable adult confides in a member of staff and requests that the information is kept secret, it is important that the member of staff tells the adult sensitively that he or she has a responsibility to refer cases of alleged abuse to the appropriate agencies. Within that context, the adult should, however, be assured that the matter will be disclosed only to people who need to know about it.
- 16.6 Where possible, consent should be obtained from the vulnerable adult before sharing personal information with third parties. In some circumstances obtaining consent may be neither possible nor desirable as the safety and welfare of the vulnerable adult is the priority.
- 16.7 Where a disclosure has been made, staff should let the vulnerable adult know the position regarding their role and what action they will have to take as a result.
- 16.8 Staff should assure the vulnerable adult that they will keep them informed of any action to be taken and why. The vulnerable adults' involvement in the process of sharing information should be fully considered and their wishes and feelings taken into account.

## **17 Keeping Children and Adults at Risk Informed and Involved**

- 17.1 The views of the child or adult at risk should be taken into account throughout the process of dealing with a safeguarding matter. The designated Safeguarding Officer will keep the person informed while the matter is within the jurisdiction of LSP and will provide support as required. Clients, learners and staff will be provided with information on TQ Training's child and adult protection procedures.

## **18 The Role of Key Individual Agencies**

### **Department of Health**

- 18.1 The Department of Health's recent 'No secrets' guidance document requires that authorities develop a local framework within which all responsible agencies work together to ensure a coherent policy for the protection of vulnerable adults at risk of abuse.

### **Local Authorities**

- 18.2 All local authorities have a Safeguarding Adults Board, which oversees multi-agency

work aimed at protecting and safeguarding vulnerable adults. It is normal practice for the board to comprise of people from partner organisations who have the ability to influence decision making and resource allocation within their organisation.

18.3 If an allegation of abuse is made, the designated Safeguarding Officer should make a referral to one of the local authorities.

## **The Police**

The Police play a vital role in Safeguarding Adults with cases involving alleged criminal acts. It becomes the responsibility of the police to investigate allegations of crime by preserving and gathering evidence. Where a crime is identified, the police will be the lead agency and they will direct investigations in line with legal and other procedural protocols.

## **Prevent Coordinator & Channel referrals**

18.4 LSP will actively engage with other partners including police and BIS regional higher and further education Prevent co-ordinators.

18.5 Channel is an early intervention multi-agency process designed to safeguard vulnerable people from being drawn into violent extremist or terrorist behaviour.

18.6 If the Safeguarding Officer determines that referral to the Channel panel is appropriate, they will contact the regional Prevent Coordinator.

18.7 18.7 Details of the regional Prevent Coordinators can be found at:  
<http://www.safecampuscommunities.ac.uk/>

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## **19 The Role of Line Managers**

19.1 The role of the Line Manager is to support the member of staff involved with the incident and to ensure the correct procedures are followed.

19.2 The Line Manager may, if agreed with the staff member dealing with the incident, make contact with the designated Safeguarding Officer in the first instance.

19.3 The Line Manager should ensure that all staff within their team are familiar with LSP's Safeguarding procedures and ensure that all staff undertake training, where appropriate.

## **20 Learner and staff support**

- 20.1 LSP will seek to actively safeguard all learners and provide welfare support at the point of need for all learners.
- 20.2 Anti-bullying strategies will be put in place to challenge discriminatory behaviour.
- 20.3 Response will be made to identify community needs.
- 20.4 LSP will actively narrow the achievement gap between different groups of learners.
- 20.5 A culture of vigilance is key, and LSP will operate a whistle blowing procedure which includes reference to the Prevent agenda.

## 21 Training and awareness of the Policy and Procedure

21.1 All staff are required to review this Policy on an annual basis. Training will be provided, as appropriate, to reinforce staff awareness of these procedures.

21.2 Mandatory Prevent training will equip staff with the ability to recognise signs that a learner or colleague might be on the path to becoming radicalised and outline the process by which concerns should be raised. [Counter-Terrorism and Security Act 2015 \(legislation.gov.uk\)](https://www.legislation.gov.uk)

21.3 Specialist training will be provided for the members of staff with Safeguarding and Prevent responsibilities. This will include:

- i. Understanding the factors that make people vulnerable to being drawn into terrorism
- ii. Recognising this vulnerability in individual learners or staff
- iii. How to challenge extremist ideas which are used by terrorist groups and purport to legitimise terrorist activity.
- iv. What action to take, including when to make referrals to the Channel programme and where to get additional advice and support.

21.4 LSP will actively promote our Safeguarding and Prevent duties to staff and learners alike. Customers are provided with initial and ongoing awareness of the policy which is detailed in relevant handbooks.

### Development

All key staff are required to complete a corporate induction and safeguarding training on commencement of employment. They will then be required to conduct a minimum annual Safeguarding refresher workshop to ensure that knowledge and skills are maintained. Staff will receive ongoing updates through internal communications and formal 1:1 meeting where any safeguarding issues or concerns can be discussed.

LSP Employees	Training	Frequency
All Employees	Prevent for Practitioners Safeguarding in FE	Induction & Annually
Managers	Prevent for Managers Safeguarding in FE	Annually
Safeguarding Officer and Continuous Improvement	WRAP Safeguarding in FE	Annually

## **22 Related Policies**

22.1 This policy needs to be read in conjunction with other policies including:

- Whistleblowing Policy
- GDPR Policy
- Disciplinary Policy
- Recruitment and DBS Policy
- Health and Safety Policy
- Equality and Diversity Policy

