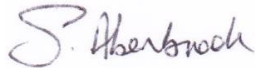


Prevent Policy

Version 1.3

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Signed by	
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Date of next review	April 2022

Monitoring and Improvement

This policy will be reviewed annually, or in response to major changes in legislation or significant events. It is the responsibility of the Managing Director to review and monitor these procedures and to consult with other agencies as appropriate. Policy review will include consultation with local Prevent coordinators and multi-agency forums whose support and advice is recognised as crucial to the effective implementation of the policy.

1. Purpose

Our intention is that this policy will contribute to maintaining a safe, healthy and supportive learning and working environment for our learners, staff and partners alike. We recognise that extremism and exposure to extremist materials and influences can lead to poor outcomes for learners. We further recognise that if we fail to challenge extremist views, we are failing to protect the people we work with and for from potential harm.

This policy and associated procedures have been developed to:

- preventing violent and non-violent extremism and radicalisation of learners and staff that work with and for Interventions Consulting, in line with the Government Prevent Strategy.
- ensure that all staff understand Prevent and their legal and moral duties
- 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
- provide a framework to embed British Values into the curriculum and ways of working; and
- recognise current practice which contributes to the Prevent agenda and identify areas for improvement

2. Scope

This policy applies to everyone working for and with Interventions Consulting.

Interventions Consulting is committed to supporting vulnerable people through its Safeguarding and Prevent Policies and procedures.

We expect the Senior Leadership Team and all staff to have an understanding of the factors that make people vulnerable to being drawn into terrorism and to challenge extremist ideas which are used by terrorist groups and can purport to legitimise terrorist activity.

Whilst this is a stand-alone policy, it is integral to our Safeguarding Policy and should be applied as an extension to this Policy and associated procedures.

3. Leadership Vision

- To create and maintain an ethos that upholds our core values, of shared responsibility and wellbeing for all learners and employees whilst promoting respect, equality and diversity and understanding.

This will be achieved through:

- Promoting our core values of respect, equality and diversity, democratic society, learner voice and participation
- Raising awareness and understanding of the issues and building confidence to deal with these through a range of educational and information sharing events, such as; staff training, specialist tutorials and running awareness campaigns
- Actively working with representatives from the community, local Prevent coordinators, local authorities and other partners
- Teaching and Learning

- To deliver programmes that promote British Values, build the resilience of our learners by undermining extremist ideology and supporting the learner voice.

This will be achieved through:

- Embedding British Values, equality, diversity and inclusion, wellbeing and community cohesion throughout our programmes
- Promoting wider skills development such as social and emotional aspects of learning
- Programmes adapted to challenge extremist narratives and promote universal rights
- Teaching, learning and assessment strategies that explore controversial issues in a way that promotes critical analysis
- Encouraging active citizenship and learner voice

4. Raising Awareness/ Active Promotion

This policy, safeguarding and The Prevent Agenda are constantly promoted through:

- Training
- Teaching
- Contract review
- Individual performance review
- Our intranet

We have a commitment to ensuring that during all staff and learner inductions; Health and Safety, Safeguarding, Prevent, Whistleblowing and Complaints procedures are covered and understood.

We also ensure that all staff complete mandatory training on Safeguarding and Prevent annually, as a minimum, to ensure we keep our learners and staff safe.

We expect all staff to:

- Take up the development opportunities that Interventions Consulting offers
- Familiarise themselves with matters relating to Safeguarding and the Prevent Agenda
- Through performance review and other opportunities, consider and examine what additional knowledge and skills they may need to carry out their role effectively
- Seek out and reflect upon any feedback from colleagues, peers and learners about what they do in practice and ensure they role model appropriate behaviours

5. What is Prevent

Prevent is 1 of the 4 elements of CONTEST, the government's counter-terrorism strategy. It aims to stop people becoming terrorists or supporting terrorism.

Prevent happens before any criminal activity takes place by recognising, supporting and protecting people who might be susceptible to radicalisation and 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 stop people being drawn into terrorism and violent extremism and ensure they are given appropriate advice and support; and
- work with a wide range of sectors where there are risks of radicalisation which needs to be addressed, including education, criminal justice, faith, the internet and health.

The strategy covers all forms of terrorism, including far right extremism and some aspects of non-violent extremism.

The Prevent Duty places a duty on specified authorities, including Further and Higher Education, to have due regard to the need to prevent people from being drawn into terrorism.

6. Definitions

The following are commonly agreed definitions within the Prevent duty:

- **Extremism** is vocal or active opposition to fundamental British Values, including democracy, the rule of law, individual and mutual respect and tolerance of different faiths and beliefs. This may also include extremism calls for the death of members of our armed forces, whether in this country or overseas.
- **Non-violent extremism** is extremism, as defined above, which is not accompanied by violence.
- **Terrorism**, as defined in the Terrorism Act 2000 (TACT 2000) 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.
- **Terrorist-related offences** are those (such as murder) which are not offences in terrorist legislation, but which are judged to be committed in relation to terrorism.
- **Prevention** in the context of this document means reducing or eliminating the risk of individuals becoming involved in terrorism. Prevent includes but is not confined to the identification and referral of those at risk of being drawn into terrorism into appropriate interventions. These interventions aim to divert vulnerable people from radicalisation.
- **Radicalisation** refers to the process by which a person comes to support terrorism and extremist ideologies associated with terrorist groups
- **Safeguarding** is the process of protecting vulnerable people, whether from crime, other forms of abuse or (in the context of this document) from being drawn into terrorism related activity.
- **Vulnerability** describes the condition of being capable of being injured; difficult to defend; open to moral or ideological attack. Within Prevent, the word describes factors and characteristics associated with being susceptible to radicalisation.
- **Interventions** are projects intended to divert people who are being drawn into terrorist activity. Interventions can include mentoring, counselling, theological support, encouraging civic engagement, developing support networks (family and peer structures) or providing mainstream services (education, employment, health, finance or housing).

7. Roles and Responsibilities

7.1 Senior Leadership Team

The Senior Leadership team is responsible for driving our leadership vision:

- To create and maintain an ethos that upholds our core values, of shared responsibility and wellbeing for all learners and employees whilst promoting respect, equality and diversity and understanding
- To deliver programmes that promote British Values, build the resilience of our learners by undermining extremist ideology and supporting the learner voice.

In so doing they must exemplify **British values in their management of the business and through their general behaviours.**

Additionally, they must:

- complete all mandatory training
- understanding the risk of radicalisation
- ensure staff understand the risk and build the capabilities to deal with it
- communicate and promote the importance of the duty; and
- ensure staff implement the duty effectively

7.2 Designated Safeguarding Lead

Sarah Abenbrook, Managing Director, is the Designated Safeguarding Lead with overall responsibility for ensuring that our Prevent Policy is implemented effectively and that any concerns are shared with the relevant agencies, to minimise the risk of our learners and staff becoming involved with terrorism.

The DSL is also responsible for ensuring that all new members of staff/ associates complete mandatory training, as listed within this policy, as part of the onboarding process.

7.3 All Staff

Under The Prevent Duty, all staff must:

- understand what radicalisation means and why people may be vulnerable to being drawn into terrorism as a consequence of it.
- be aware of what we mean by the term “extremism” and the relationship between extremism and terrorism
- know what measures are available to prevent people from becoming drawn into terrorism and how to challenge the extremist ideology that can be associated with it.
- understand how to obtain support for people who may be being exploited by radicalising influences.

We ensure our staff meet these requirements through:

- undertaking all mandatory training, as identified by the leadership team
- ensuring they are familiar with policies and procedures relating to safeguarding and Prevent

- making sure they understand when it is appropriate to refer concerns about learners or colleagues to the DSL or Deputy Safeguarding Officer
- promoting the Prevent agenda within our business and across our network
- participating in multi-agency forums and other partner events

We expect staff to:

- treat everyone fairly and equally, respecting diversity and ensuring inclusion at all times
- exemplify British values in their teaching and through general behaviours
- ensure all Apprentices undertake Prevent training as part of their induction
- educate Apprentices on the issues of extremism and radicalisation and encourage open discussion

8. Mandatory Training

Training	Applies to
Prevent Online Training	All staff/ apprentices
British Values	All staff/ apprentices
Channel Awareness eLearning	All staff
Prevent Referrals eLearning	DSL & Deputy Safeguarding Officer

9. Managing risk

Through maintaining effective partnerships, we identify where and how learners and staff may be at risk of being drawn into terrorism, assess the likelihood of such risks and set measures to manage these through our policies and procedures relating to recruitment, training, contract and learner review, safeguarding, whistleblowing and complaints handling.

Our DSL works in partnership with a range of external partners to understand potential risks and discuss changes which may impact on those working in and with Interventions Consulting. These include:

- partnerships with regional Prevent coordinators, the Police and local authorities
- participation in multi-agency forums
- formal contract reviews with employers and delivery partners

The DSL also heads up a process of internal safeguarding review, where any reported concerns/ changes in the behaviour of apprentices/ staff members which could indicate extremist views/activity are discussed and action plans agreed.

Where new risks are identified the DSL will update Staff and relevant parties and where appropriate, internal policies and procedures will be adapted to ensure effective controls are in place.

10. Raising a concern

If any member of staff has concerns or receives information relating to concerns/ changes in the behaviour of learners or colleagues which could indicate extremist views or that they may be being exploited by radicalising influences, this must be reported immediately to our Designated Safeguarding Lead, or Deputy Safeguarding Officer in their absence.

Designated Safeguarding Lead: Sarah Abenbrook

Sarah.abenbrook@interventionsconsulting.com

Deputy Safeguarding Officer: Sarah Aspinall

Sarah.aspinall@interventionsconsulting.com

Managing Director

07951 043099/ 0113 4931943

Head of Operations

07900 375057/ 0113 4931943

11. What happens next?

The DSL will gather as much information as they can, in order to compile a comprehensive report.

If they believe there should be a referral to Channel, they will contact the local Police Channel Coordinator who will assess whether there is a specific risk of radicalisation.

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

What does Channel support look like?

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.

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.

12. Information Sharing

Effective information sharing is key to the delivery of Prevent, so that partners are able to take appropriately informed action. This will sometimes require the sharing of personal information between partners; this is particularly the case for Objective 2 of the Prevent strategy, supporting vulnerable people, where sharing of information will be central to providing the best support to vulnerable individuals.

The overriding principles are **necessity** and **proportionality**. It should be confirmed by those holding information that to conduct the work in question it is necessary to share the information they hold. Only the information required to have the desired outcome should be shared, and only to those partners with whom it is necessary to share it to achieve the objective. Key to determining the necessity and proportionality of sharing information will be the professional judgement of the risks to an individual or the public.

Each request should be judged on its own merit, and the following questions should be considered when sharing information:

- what information you are intending to share;
- with whom you are intending to share the information;
- why you are intending to share the information (i.e. with what expected outcome); and
- the legal basis on which the information is to be shared.

The participants each rely upon the lawful basis for processing set out in Article 6(1)(e) GDPR: the processing is necessary for the performance of a task carried out in the public interest or in the exercise of official authority vested in the controller. Section 8 of the Data Protection Act 2018 provides that Article 6(1)(e) includes processing of personal data that is necessary for the exercise of a function conferred on a person by an enactment or rule of law. It is necessary for the LA sites to process personal data for the exercise of their Channel functions under section 36 CTSA. Section 8 of the DPA 2018 also provides that Article 6(1)(e) GDPR includes processing of personal data that is necessary for the exercise of a function of the Crown, a Minister of the Crown or a government department. It is necessary for the Local Authority to process personal data relating to Channel for the purposes of these functions.

The data that panel members may be expected to share about an individual might include (but may not be limited to):

- Demographics (name, date of birth, gender, address, ethnicity)
- Offending history
- Living Arrangements
- Family and personal relationships
- Statutory education
- Neighbourhood
- Lifestyle
- Substance misuse
- Emotional and mental health
- Perceptions of self
- Thinking and behavior
- Attitudes to engagement in relevant activity
- Motivation to change
- Cultural factors

13. I.T. and Internet Safety

The internet is used in Interventions Consulting to support the professional work of staff, deliver online training via our dedicated LMS and promote learner achievement. Technology is advancing rapidly and is now a huge part of everyday life, education and business. We want to equip our learners with all the necessary I.T skills that they will need in order to enable them to progress confidently in their educational careers and onward towards their working environments when they leave education.

Some of the benefits of using ICT and the internet in education are:

For learners:

- Flexibility over when and where learners can access learning and training
- an enhanced curriculum with interactive learning tools including self-assessment and eLearning
- real time feedback and assessment opportunities
- access to a vast range of resources and reference materials
- access to subject experts, role models, inspirational people and organisations
- the ability to collaborate virtually on a local, regional and global level
- social inclusion, in class and online

For staff:

- the ability to deliver training in a more flexible way; through virtual group sessions with learners in different locations, incorporating a range of interactive support tools/speakers
- having more regular sessions which can flex around learner's work commitments
- the ability to track progress real time and provide feedback in a more timely manner
- the ability to manage diaries, attendance records and assess work through our LMS
- access to a wider network of professional and personal support partners
- professional development through access to national developments, educational materials and examples of effective curriculum practice and delivery strategies

For parents (learners under 18 and those identified as at risk)

- Communication between Interventions Consulting and parents/carers may be through e-mail and telephone messaging. These forms of electronic contact may in some cases enable a more-timely exchange of information and provide a document trail for both parties.

Roles and Responsibilities with regards to IT and internet usage

The Safeguarding Lead:

- has day-to-day responsibility for eSafety issues and plays a leading role in establishing and reviewing policies, systems and documentation
- ensures that all staff are aware of the procedures that need to be followed in the event of an eSafety incident taking place
- provides advice for staff on eSafety and how to keep learners safe

- liaises with the Local Authority through the LADO for incidents that are defined as Safeguarding concerns and appropriate referrals made

Parents/Carers (for under 18s or those defined as vulnerable or 'at risk')

- play a crucial role in ensuring that their children understand the need to use the internet and mobile devices in an appropriate way.
- will be encouraged to support in promoting good eSafety practice and to follow guidelines.

14. Whistleblowing and Complaints (please also see stand-alone policies)

In the event that an allegation is made against a staff member, either employed or associate, the matter must immediately be notified to the Managing Director (DSL). If there is a risk arising to operational delivery, key partners should be informed.

The DSL will then decide whether the incident is a potential safeguarding matter or should be dealt with under our internal Complaints and disciplinary procedures.

If the allegation is of a safeguarding nature and constitutes:

- A concern which may mean the staff member is not suitable to continue delivering training or supporting learners
- A concern which has led to the possible harm to a learner
- A safeguarding concern which may be criminal in its nature or intent

This must be reported in accordance with the procedure detailed in this policy to the DSL and appropriate authorities

15. Useful Contacts

Regional Prevent Coordinators at Department for Education, Counter-Extremism Divisions:

Region	Contact	Mobile	email
North East	Christopher Sybenga	07384456640	chris.sybenga@education.gov.uk
North West	Nigel Lund	07384 452146	nigel.lund@education.gov.uk
East of England	Dave Layton-Scott	07384 452155	david.layton-scott@education.gov.uk

Leeds City Council Prevent team 0113 535 0810 prevent@leeds.gov.uk

Police Prevent team 0113 241 3386