

Prevent Duty Policy

OUR LEGAL RESPONSIBILITY:

All further education providers have a duty to protect children and adults from the risks of extremism and radicalisation, a role which is underpinned by the Counter- Terrorism and Security Act (2015) “to have due regard to the need to prevent people from being drawn into terrorism.”

Clear Quality Limited will protect children, young people, and adults against the messages of all violent extremism including, but not restricted to, those linked to Islamist ideology, or to Far Right / Neo Nazi / White Supremacist ideology, Irish Nationalist and Loyalist paramilitary groups, and extremist Animal Rights movements. This policy will help inform and support those staff working with vulnerable groups to identify potential concerns and outline the process for referral.

Our organisation has a statutory duty to, under Section 29 of the Counterterrorism and Security Act 2015, have due regard to the need to prevent people (staff, learners, and associates) from being drawn into terrorism.

We commit to:

1. Promoting British Values including mutual respect for those with different faiths and beliefs, the rule of law, democracy and individual liberties which enhance social cohesion.
2. Encouraging open debate.
3. Embedding this aspect of safeguarding within all policies and curriculum plans.
4. Challenging extremism.
5. Providing training and informing staff of new developments.
6. Conducting risk assessments and actions plans with timely review.

Clear Quality Limited values freedom of speech and the expansion of beliefs / ideology as a fundamental right that underpins our society’s values. Both students and staff have the right to speak freely and voice their opinions. However, freedom comes with responsibility and free speech designed to manipulate the vulnerable or that leads to violence and harm of others goes against the moral principles in which freedom of speech is valued. Free speech is not an unqualified privilege; it is subject to laws and policies governing equality, human rights, community safety and community cohesion.

The current threat from terrorism in the United Kingdom may include the exploitation of vulnerable people, to involve them in terrorism or in activity in support of terrorism. The normalisation of extreme views may also make adults, children, and young people vulnerable to future manipulation and exploitation. Clear Quality Limited is clear that this exploitation and radicalisation should be viewed as a safeguarding concern.

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The Prevent Duty is about safeguarding and supporting those vulnerable to radicalisation. Prevent is one of the four elements of CONTEST, the Government's counter-terrorism strategy. It aims to stop people becoming terrorists or supporting terrorism.

What does Prevent do?

1. Responds to the ideological challenge we face from terrorism and aspects of extremism, and the threat we face from those who promote these views.
2. Provides practical help to prevent people from being drawn into terrorism and ensure they are given appropriate advice and support.
3. Works with a wide range of sectors (including education, criminal justice, faith, charities, online and health) where there are risks of radicalisation that we need to deal with.

The main aim of Prevent is to stop people from becoming terrorists or supporting terrorism. At the heart of Prevent is safeguarding children and adults and providing early intervention to protect and divert people away from being drawn into terrorist activity. Prevent addresses all forms of terrorism but continues to ensure resources and effort are allocated on the basis of threats to our national security. The Counter Terrorism and Security Act 2015 places a duty on certain bodies to have "*due regard to the need to prevent people from being drawn into terrorism*". The government has defined extremism in the Prevent Strategy as vocal opposition to fundamental British Values, including democracy, the rule of law, individual liberty and mutual respect and tolerance of different faiths and beliefs.

DEFINITIONS:

- Radicalisation refers to the process by which a person comes to support terrorism and extremism leading to terrorism.
- Extremism is defined by Government in the Prevent strategy 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. Also include in the definition of extremism calls for the death of members of our armed forces.
- Terrorism is defined by Government as "*The use of violence in order to accomplish political, religious or social objectives*". Terrorism is a criminal act that influences an audience beyond the immediate victim. Effectiveness is not the act itself but the impact on Government and the public.
- British Values are defined as "*democracy, the rule of law, individual liberty and mutual respect and tolerance for those with different faiths and beliefs.*" (Prevent Duty Guidance, HM Government, Dec 2014)

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- 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.

RESPONSIBILITIES:

Our Designated Safeguarding Officer (DSO) working with our DSO / PREVENT Lead. will assess the level of risk within and put actions in place to reduce that risk. Our risk assessments may include consideration of the external agencies, curriculum offer, provision specifically targeting vulnerable groups, disclosed safeguarding cases, and other issues specific to the community and philosophy. Our DSO / PREVENT Lead. will investigate any concerns further to assess the nature and extent of the risk. Relevant local police Prevent teams will complete an initial assessment, which will be used to inform the decision as to whether an individual should be referred to Channel; an early intervention multi-agency process that aims to protect vulnerable individuals from being drawn into terrorist or violent extremist behaviour.

Our staff responsibilities include:

- Undertaking training/refresher on Prevent Duty a minimum of every 3 years.
- Being aware of when it is appropriate to refer concerns about learners or colleagues to the Designated Safeguarding Lead / PREVENT Lead.
- Reporting concerns where these arise to the Safeguarding Team by completing our Prevent Investigation Form (Appendix 1).
- Promoting learner understanding of Prevent Duty.
- Exemplifying British values of “democracy, the rule of law, individual liberty and mutual respect and tolerance for these with difference faiths and beliefs” within your professional practice
- Challenging extremism.

Clear Quality Limited recognises that it has a key role, working in partnership, to address the many challenges faced by residents to improve outcomes. Staff are encouraged and supported to use every opportunity to make sure that learners respect and reinforce shared values whilst creating space for open debate.

PROMOTING OUR PREVENT DUTY POLICY:

We promote our Prevent Duty policy by providing all employees a copy upon induction. We keep an updated copy on our company website for learners to access.

GETTING COMMITMENT TO OUR PREVENT DUTY POLICY:

We get commitment from our staff, employers, suppliers, and apprentices to our Prevent Duty policy via:

1. CPD courses
2. Induction
3. Enrolment
4. 1-2-1 reviews
5. Performance and development reviews
6. Staff meetings or standardization

TRAINING OUR EMPLOYEES TO IMPLEMENT OUR PREVENT DUTY POLICY:

All our employees are trained to implement our Prevent Duty policy by undertaking mandatory Prevent training. All staff will receive basic Prevent Duty training every 3 years and the DSO / PREVENT LEAD will receive the appropriate level of training which is also renewable every two years. Training activities will be recorded and monitored for staff. Where a staff member has not met the training requirements, managers will be responsible for ascertaining the reason why and ensuring compliance is met at the earliest opportunity.

All new members of staff receive a thorough Prevent induction and Prevent training, unless they can demonstrate they have completed the same standard of training recently, in which they would be exempt. However, they would still need to be trained in the reporting methodology and expectations of Clear Quality Limited.

Induction training will cover preventative action, roles, and responsibilities as well as reporting mechanisms. Regular Prevent Duty updates are available to ensure that any updates or developments are disseminated to staff, so they remain current.

Training will include but not be restricted to:

- Abuse
- Basic Child Protection Procedures and Vulnerable Adults
- Bullying
- Grooming
- E-Safety
- Prevent, Radicalisation & British Values
- Risk Assessment
- Confidential Reporting Code (Whistle Blowing)
- Staff Code of Conduct

Training will be updated at least every three years for all staff.

PROTECTING APPRENTICES AND EMPLOYEES FROM RADICALISING INFLUENCES:

Our organisation will protect our apprentices and employees from radicalising influences and the risks of extremism and radicalisation by:

1. Covering our Prevent Duty policy during IAG and enrolment.
2. Completing safeguarding checks during all learning sessions and reviews. These checks cover Prevent in addition to other areas such as safeguarding, equality and diversity, health and safety, and British Values.
3. Completing observations of teaching and learning, to ensure trainers are embedding our Prevent Duty policy into their learning sessions.
4. Issuing feedback surveys every 12 weeks to learners and employers, to identify any concerns surrounding the Prevent Duty.

ENSURING APPRENTICES AND EMPLOYEES ARE RESILIENT TO EXTREME NARRATIVES:

Our organisation will ensure apprentices and employees are resilient to extreme narratives by:

- Undergoing Prevent Duty training, which will provide them with a solid understanding of the importance of and how to challenge extremist narratives.
- Encouraging discussions of Prevent between employees and apprentices on a regular basis, so both parties are continually reminded that extreme/radical perspectives are not tolerated.
- Ensuring all apprentices and employees are routinely reminded of our Prevent reporting procedures.

IDENTIFYING CHANGES IN BEHAVIOUR OF APPRENTICES AND EMPLOYEES:

Our referral process, outlined below, comprises of 5 key actions that must be followed by all individuals:

- Recognise the signs of extremism and radicalisation.
- Respond and react accordingly.
- Record the facts of the disclosure.
- Report the disclosure to the DSO / PREVENT LEAD immediately. All Prevent Investigation Forms must be forwarded to the DSO / PREVENT LEAD within 24 hours.
- Refer (to the emergency services or Social Services or through the Channel process) in situations where an individual may be at risk of immediate harm and ensure that information is reported to the DSO / PREVENT LEAD (or Deputy/Safeguarding Officers) immediately.

RECOGNISE:

Our organisation can identify changes in behaviour of apprentices and/or employees that may indicate signs of extremism or radicalisation. Some examples of these changes are:

- Isolating themselves from family and friends.
- Talking as if from a scripted speech.
- Unwillingness or inability to discuss their views.
- A sudden disrespectful attitude towards others.
- Increased levels of anger.
- Increased secretiveness, especially around internet use.

We inform all our staff, learners, employers, and other stakeholders to remain vigilant with regards to the Prevent Duty and report any concerns to our DSO / PREVENT LEAD, by completing our Prevent Investigation Form.

RESPOND:

Listed below are some ways to respond to issues or concerns surrounding Prevent:

- Do not delay in discussing your concerns with the appropriate staff. If you feel that anyone is at immediate risk, please take any reasonable steps within your role to protect any person from immediate harm, for example:
- Call an ambulance or a GP if someone needs medical attention
- Call the emergency services/police if a crime is taking place or has taken place
- Inform the DSO / PREVENT LEAD immediately

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- Separate the alleged perpetrator and victim – but only if it is safe to do so. Any violence by a learner or member of staff (including employer staff) must be reported through ALSS's Internal Notification Process.

If you are suspicious but no disclosure has taken place, discuss your concerns with the DSO / PREVENT LEAD.

If a person approaches you to make allegations of inappropriate behaviour or misconduct against a member of staff:

- Contact your Line Manager and DSO / PREVENT LEAD.
- Do not question the person making the allegation or investigate the matter yourself.

Information Sharing

There may be some circumstances where the welfare or safety of an individual may take precedence over confidentiality. When sharing information, remember:

- The Data Protection Act (2018) is not a barrier to sharing information
- Be open and honest
- Seek advice
- Share with informed consent where appropriate (There may be some circumstances where seeking consent, including parental consent, is not required)
- Consider safety and well-being
- Ensure that information sharing is appropriate and secure
- Keep a record.

RECORD:

A Prevent Investigation Form (Appendix 1) must be completed. Where a Prevent Investigation Form is not readily available, please ensure that the following information is noted:

- Your details
- Name of those involved
- Date of incident(s)/disclosure/suspicion
- Details of incident(s)/disclosure/suspicion
- Background information
- Actions taken.

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Whilst you can record observations, do not interpret, or give opinions as this may bias the information provided and jeopardise any future investigation into the allegation. The Prevent form should be kept secure and forwarded to your DSO / PREVENT LEAD.

REPORT:

Any issues, concerns, allegations, or suspicions relating to Prevent must be taken seriously and reported to the DSO / PREVENT LEAD.

REFER:

Where required, the DSO / PREVENT LEAD will deal with the relevant referrals and liaising with the relevant external agency. This will include the following:

- Any referrals to first contact - 03000 267 979 (children / adult services) or through the Channel process (first contact - 03000 267 979)
- Where there is disagreement between members of staff about the need to make a referral.
- Concerns about a young person subject to a Child Protection Order should be relayed to the keyworker immediately. In the absence of a key worker, the procedure below should be followed.

Learners Aged 18 Years or Over

There is no requirement to report abuse to any external agency unless there is a risk to others aged under 18 years, or it concerns an adult at risk, in which case Clear Quality Limited safeguarding procedures should be followed. The learner may wish to involve the police. The role of staff is to support them through this process. Alternatively, if this is past abuse, then the learner may require directing towards a counselling agency, such as NSPCC, Victim Support, Support line or other abuse survivor support agencies.

DEALING WITH ANY ISSUES RAISED BY APPRENTICES OR EMPLOYEES:

It is important that any issues are dealt with as soon as possible in a proportionate manner and that members of the community are aware those issues have been dealt with. Any suspected misuse must be reported to the Clear Quality Limited DSO / PREVENT LEAD and then an appropriate course of action will be agreed. Where it is suspected that any misuse might have taken place by a relevant

member of staff (both internal and external), an investigation will take place by the DSO / PREVENT LEAD and the Health and Safety rep and, depending on the nature of the misuse, appropriate action could include disciplinary procedure or termination of contract.

Where an allegation has been made against a learner, an investigation will take place by the DSO / PREVENT LEAD and Health and Safety Representative. The outcome of the investigation will decide what will be the appropriate course of action and depending on the nature of the misuse the learner could be suspended from their course until the investigation is complete. The learner code of conduct procedure will be invoked should the allegation be found to be true, and the sanction will depend on the seriousness of the misuse and whether it was accidental or deliberate, a first-time offence, thoughtless or malicious e.g., intended to cause harm to others. Sanctions could involve the learner having ICT access removed for a period of time or in very serious cases, exclusion. Where there is a potential legal issue the need for involvement of outside agencies including the police, together with the designated persons and Senior Management team in line with our Prevent and other policies.

Any concerns around the misuse of ICT must follow our referral process, where there is a potential threat to another learner, vulnerable person, or member of staff.

SUPPORT AND GUIDANCE FOR APPRENTICES:

We provide our apprentices with support and guidance through:

- Information, advice, and guidance packs and leaflets.
- Enrolment and induction training for apprentices.
- Making DSO / PREVENT LEAD contact details available in varying locations.
- Policy and forms being available on our company website for learners.

MONITORING OUR IT USAGE:

We monitor our IT usage via Microsoft 365 (Azure) analytics. Anything that is flagged during these checks would be fed up the line by our IT team to our senior management team, as part of the quarterly management review. If an incident is deemed to be an emergency, the matter would be dealt with immediately. All incidents highlighted would be entered into the NCCI system and form part of our annual Quality Improvement Plan (QIP) review.

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OUR ACCEPTABLE USE POLICY:

Our acceptable use policy, outlined below, details how we will proactively monitor internet usage and access to IT systems and equipment to identify any actions or material promoting radicalisation and/or terrorism.

Learners should fully participate in Online Safety activities and report any suspected misuse to a member of staff. Learners are made aware of their responsibilities within the induction to the programme. Learners and staff are expected to:

- Behave in a safe and responsible manner.
- Treat equipment with respect.
- Use USB/flash memory key(s) only when absolutely necessary
- Be polite and not use e-mail, social media, or blogs etc. to make negative comments, bully, or insult others.
- Use the resources only for educational purposes.

Learners and staff are expected not to:

- Waste resources including Internet and printers.
- Eat or drink near ICT facilities.
- Use someone else's login details or share your own.
- Have any inappropriate files e.g., copyrighted or indecent material
- Attempt to circumvent or "hack" any systems.
- Use inappropriate or unacceptable language.
- Reveal their personal details or passwords.
- Visit websites that are offensive in any way.
- Download anything inappropriate or install any programs.

Breaching these rules may lead to:

- Withdrawal from ICT facilities
- Temporary or permanent prevention of access to the relevant pages on the Internet.
- Limited or disabled rights where systems are relevant.
- Appropriate disciplinary action.
- Users should note that breaches of the provisions set out in these Rules may lead to criminal or civil prosecution.