



## PREVENT POLICY

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## Document Control

<b>Version:</b> <b>0.5</b>	<b>Production/Review:</b> May 2022	<b>Authors:</b> All HR Staff
<b>Objective of Document:</b> To set the Organisation's commitment to ensure that all learners, staff and all those who solicit our services are prevented from radicalisation		
<b>Intended Recipients:</b> All Organisation Staff, Learners, Guardians/Parents		
<b>Monitoring Arrangements:</b> Through designated Monitoring Group of Organisation's Head of Centre, Whistle-blowing Systems, Staff Reviews, CQC, Ofsted & Stakeholder Monitoring Visits		
<b>Training/Resource Implications:</b> Through Board & Staff Training/Professional Development programmes and within other existing resources/procedures		
<b>Approving Body &amp; Date Approved:</b>		Principal / Head of Centre
<b>Date of Issue:</b>		10 May 2022
<b>Scheduled Review Date:</b>		09 April 2023
<b>Scheduled Period of Review</b>		Every Year
<b>Lead Officer:</b> (a contact person who can assist with inquiries about the policy and any other tools or supporting materials that will help the policy to be understood and successfully implemented)		HR MANAGER



Samuel Ofori-Kyereh  
Responsible Director  
10 May 2022

## 1. POLICY STATEMENT

Verity Healthcare Limited recognises that as a provider of apprenticeship training it has a responsibility to ensure it fulfils responsibilities regarding its Prevent duty and anti-radicalisation procedures.

The Prevent Policy reflects the importance of our responsibility to safeguard and promote the welfare of all our apprentices and staff by protecting them from physical, sexual or emotional abuse, neglect and bullying. This directly relates to UK Government guidelines and addresses the three published priorities:

The Prevent strategy has three objectives:

- Challenging the ideology that supports terrorism and those who promote it,
- Protecting vulnerable people,
- Supporting sectors and institutions where there are risks of radicalisation.

Prevent is one of four strands of the government's counter-terrorism strategy, known as Contest. Prevent is designed to support people at risk of joining extremist groups and carrying out terrorist activities. VHL are committed to providing a caring, friendly and safe environment for all our apprentices so that they can learn in a relaxed and secure atmosphere. VHL believes every apprentice should be able to participate in all teaching and learning and social activities in an enjoyable and safe environment and be protected from harm.

VHL have a statutory requirement under Sections 27 and 47 of the Children Act 1989 to assist the appropriate Local Authority Social Services Department acting on behalf of children in need. VHL will safeguard and promote the welfare of children in compliance with the DfE guidance Keeping Children Safe in Education (July 2015) KCSIE (September 2016) and associated guidance Working Together to Safeguard Children (2015) WT in addition to the Care Act 2014.

The Counter Terrorism and Security Act 2015 introduced the Prevent duty for various bodies including all FE colleges, sixth form colleges, adult education providers and independent learning providers. VHL is fully compliant with all relevant statutory guidance on children who run away or go missing from home or care (January 2014) and The Prevent Duty (The Counter-Terrorism and Security Act June 2015) and Social Media for Online Radicalisation (July 2015) This Policy should be read in conjunction with VHL Safeguarding procedures and guidance.

### Summary

This document should be read in conjunction with Reach 4 Skills 'Safeguarding' policy this document specifically relates to **Prevent**, **Contest** and **Channel**. It is intended to provide staff with information and to identify the characteristics of each safeguarding category and actions to be taken.

## 2. PURPOSE

Verity Healthcare Limited Apprenticeships, (VHL) has as its main aims of this policy are to ensure that staff are fully engaged in being vigilant about raising awareness; that they overcome professional disbelief that such issues will not happen and ensure that VHL works alongside other professional bodies and adopts a multi-agency approach to ensure that our apprentices and staff are safe from harm.

The Centre is required under the Counter-Terrorism and Security Act 2015 to 'have due regard to the need to prevent people from being drawn into terrorism'. Under section 29, it must have regard to guidance issued by the Home Secretary. The *Prevent Duty Guidance for Schools in England and Wales*<sup>1</sup> came into effect on 18 September 2015 following approval by Parliament. This document sets out how we are complying with the Duty, taking account of changes in practice introduced by the Prevent duty.

The aim of the policy is to ensure that:

- Our apprentice trainers and other staff are aware of and understand their responsibilities, that of others, and for signs that there might be a Prevent duty concern, along with the reporting procedures for all Prevent duty issues.
- Ensure an awareness of Prevent within the College
- Provide a clear framework to structure and inform our response to safeguarding concerns, including a supportive referral process for those who may be susceptible to the messages of extremism
- Embed British Values into the curriculum and ways of working
- Recognise current practice which contributes to the Prevent agenda
- Identify areas for improvement

### **3. SCOPE**

The Prevent Policy applies to all staff and students of the Centre and is designed to help individuals understand their responsibilities and what to do if they suspect that someone is at risk of being drawn into extremism or terrorism.

This policy applies to all apprentices and VHL staff associated with apprentice training operations and delivery.

### **4. LEGAL FRAMEWORK**

Prevent is one of 4 strands of the Government's counter terrorism strategy – CONTEST. The UK currently faces a range of terrorist threats. Terrorist groups who pose a threat to the UK seek to radicalise and recruit people to their cause. Therefore early intervention is at the heart of Prevent which aims to divert people away from being drawn into terrorist activity.

Prevent happens before any criminal activity takes place by recognising, supporting and protecting people who might be susceptible to radicalisation.

The national Prevent Duty confers mandatory duties and responsibilities on a range of public organisations, including Further Education Colleges, and seeks to:

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<sup>1</sup>

[https://www.gov.uk/government/uploads/system/uploads/attachment\\_data/file/445916/Prevent\\_Duty\\_Guidance\\_For\\_Higher\\_Education\\_\\_England\\_\\_Wales\\_.pdf](https://www.gov.uk/government/uploads/system/uploads/attachment_data/file/445916/Prevent_Duty_Guidance_For_Higher_Education__England__Wales_.pdf)

- 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 prevent people from being drawn into terrorism and violent extremism and ensure they are given appropriate advice and support.
- 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 Government has created a system of 'threat level' which represents the likelihood of a terrorist attack in the near future. The current threat level from international terrorism in the UK is severe, which means that a terrorist attack is highly likely.

## **5. OUR PREVENT POLICY HAS FIVE KEY OBJECTIVES:**

The key objectives of prevent policy are:

- To promote and reinforce shared values, including British Values
- To create space for free and open debate; and to listen and support the learner voice.
- To breakdown segregation among different student communities including by supporting inter-faith and inter-cultural dialogue and understanding; and to engage all students in playing a full and active role in wider engagement in society.
- To ensure student safety and that the College is free from bullying, harassment and discrimination.
- To provide support for students who may be at risk of radicalisation, and appropriate sources of advice and guidance.
- To ensure that students and staff are aware of their roles and responsibilities in preventing violent and non-violent extremism.

## **6. LEGAL REQUIREMENTS**

VHL has a duty of care to all of its learners, but particular responsibilities to those under 18 years, and those who are vulnerable adults. There are four main elements to the policy:

- a) Raising awareness of radicalisation issues and equipping young people and vulnerable adults with the skills needed to keep them safe;
- b) Developing and implementing procedures for identifying and reporting safeguarding cases;
- c) Supporting young people and vulnerable adults who have been identified as in need of early help or at risk of harm and those preventing them from being radicalised
- d) Establishing a safe environment in which young people and vulnerable adults can learn and develop.

## **7. LEGISLATION**

This policy should be read in conjunction with the:

- Safeguarding Policy and Procedure: Apprenticeships
- Equality and Diversity Policy; Apprenticeships
- Apprentice Welfare Statement
- Bullying and Harassment Policy
- Apprentice Positive Behaviour Strategy and Procedure
- Apprentice Positive Behaviour Strategy and Disciplinary Procedure
- Apprentice Attendance Management Procedure
- Employee Recruitment and Selection Process

- Apprentice Fair Access and Reasonable Adjustments Policy
- Complaints Policy, Procedure and Process: Apprenticeships
- Whistleblowing policy
- Employee Grievance and Disciplinary Procedures
- Health and Safety policy
- Data Protection Policy (confidentiality).

## 8. FIVE KEY OBJECTIVES:

- To promote and reinforce shared values
- To help empower apprentices and other learners engaged to play a wider role in their communities
- To ensure apprentice and other learners' safety and raise awareness of the damage caused by bullying, harassment and discrimination
- To provide appropriate sources of advice and guidance
- To ensure that learners and employees are aware of their roles and responsibilities in preventing violent extremism.

In the course of undertaking the 20% off the job training, apprentice trainers and/or other staff may learn of issues appertaining to Prevent duty and where this arises a procedure is in place to ensure they fulfil their duty of care.

VHL recognises that an apprentice has employed status and as such the policy also references the employers' responsibilities for the Prevent duty.

## 9. DEFINITIONS/INTERPRETATION

The following are commonly agreed definitions within the Prevent agenda:

- **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, 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.
- **Vulnerability** describes factors and characteristics associated with being susceptible to radicalisation.
- **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.

## 10. KEY PRINCIPLES OF THE POLICY:

**This policy is based on the following principles:**

- Effective and accurate identification, assessment and management of risk
- Safe recruitment, selection and development of staff and apprentices
- The welfare of apprentices is paramount and individuals are treated with respect and dignity
- Roles and responsibilities for Prevent duty are clearly identified
- Guidance, training and support is provided for staff and apprentices
- Where it is safe to do so the apprentice is made aware when disclosures are to be reported to the Apprenticeships Programme Lead who also holds responsibility, as our Designated Safeguarding Officer for the Prevent duty

- Information about concerns is shared with appropriate individuals and agencies who need to know.

## 11. RESPONSIBILITIES

All members of Verity Healthcare Limited community, including staff, employers, students, contract staff, and work experience providers are responsible for Prevent Policy and promoting the welfare of children and vulnerable adults.

## 12. KEY CONTACT

Name of Designated Safeguarding Lead (DSL): **Ms. Dilanee Widhanelage**

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## 13. OVERVIEW

The Centre welcomes the Government's intention that the Prevent Duty is implemented 'in a proportionate and risk-based way' and that it should not create large new burdens on institutions. We therefore intend to implement our legal responsibilities as part of our existing policies and procedures, which we also consider to be the best way of ensuring a joined-up approach. In doing this we will actively involve the Students' Union and the recognised trade unions and will continue to consult them should any changes to this policy be required in the future.

We take seriously our responsibility to ensure the safety and wellbeing of students, staff, stakeholders, partners, contractors, and the wider community and as part of this, would wish to do all that we can to prevent any member of the Centre community from being drawn into extremism and/or terrorism. We also value the principles of academic freedom and general freedom of expression and have a statutory duty to protect them. Some of the ways in which we meet these responsibilities are set out in this document, on which we have consulted students and staff.

## 14. PREVENT SPECIFICS

Fundamental to safeguarding is the PREVENT duty, which requires the Education sector to have "due regard to the need to prevent people from being drawn into terrorism", supporting terrorism or being drawn into non-violent extremism.

Counter-Terrorism and Security Act Sect 26 CTS Act places a duty on certain bodies (specified authorities – listed in Schedule 6) to have "due regard to the need to

prevent people from being drawn into terrorism". Guidance is issued under Section 29 of the Act:

- 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

#### **14.1 PREVENT DUTY PROCESS**

This Prevent duty process has three aspects;

- **Identify** where risks around radicalisation are most likely to occur relevant to the industry and types of apprentice in any cohort
- **Help** by putting in place processes or strategies to appropriately support apprentices and providing them with good quality information (e.g. staying safe on line) to increase their resilience and well being.
- **Manage** Prevent duty risks in a way that is appropriate to our business and which act to minimise Prevent duty incidents or issues.

#### **PROCEDURE SHOWING HOW WE WILL FULFIL THE PREVENT DUTY**

1. If an employee or associate identifies people at risk of being drawn into terrorism or extremism, they should assess the nature and extent of that risk and consider if it poses an immediate danger.
2. Report to the Prevent duty lead (Designated Safeguarding Officer), initially this can be a verbal report but it should be followed up with a written report using the same report form that we use for Safeguarding.
3. Designated Safeguarding Officer undertakes an initial investigation and considers whether the Prevent Duty concern is also a Safeguarding concern.
4. Designated Safeguarding Officer to liaise with the apprentices' employer where it is safe and appropriate to do so.
5. Where relevant, develop the most appropriate support plan for the apprentice or employee.
6. Or where deemed a Prevent Duty risk the Designated Safeguarding Officer will invoke the Channel Referral Process. As part of the referral process, the Designated Safeguarding Officer will raise an electronic referral, which goes to the Police.
7. Employees, associates and the Designated Safeguarding Officer will cooperate with the authorities who may take the process forward from this point.

#### **15. PROMOTION OF THE POLICY AND PROCEDURE**



VHL will promote and publicise the Prevent Duty Policy as widely as possible using our Internal SharePoint site (for apprenticeship training staff), website, apprentice induction guide, learner handbooks and reports.

- a) We all have a responsibility to ensure that apprentices at risk are protected from harm, informed about potential risks to their welfare, understand how to seek help and to ensure any concerns are dealt with in a timely and appropriate fashion, in line with best Prevent and safeguarding practises such as the concept of "early help", providing support as soon as a problem emerges.
- b) We also have a responsibility to minimise the risk of allegations against apprentice trainers and other staff.
- c) All staff and apprentice trainers are expected to have a good understanding of what constitutes a Prevent duty or welfare concern and how to provide support or guidance and the channels for escalating a concern. It will also ensure that they can identify the Designated Safeguarding Officer (DSO) for VHL, who also holds responsibility for our adherence with the Prevent duty.
- d) We will ensure that the contractual arrangements with associate apprentice trainers clearly sets out their Prevent duty obligations.
- e) We will ensure that the contractual arrangements with the apprentices' employer identifies who to contact so that we can understand how the employer meets their Prevent duty obligations for their apprentices.
- f) We will provide initial and on-going training and information to proactively promote Prevent duty awareness and support all staff and apprentice trainers to understand their individual responsibilities. Where no formal training is held by our apprentice trainers, we will support them through distance learning prior to deployment. All associate apprentice trainers contracted by VHL will be given access to a secure site where this and other important policies are located. They will be required to submit evidence of their annual CPD in the area of their Prevent duty.
- g) We will provide information on Prevent duty, safeguarding, welfare and well-being during the apprentices' on-boarding and induction. It will also be included as a standing item as part of the review process to ensure ongoing awareness.
- h) 8. The Designated Safeguarding Officer (DSO) for VHL, who also holds responsibility for our adherence with the Prevent duty is assigned to the role of the Apprenticeships Programme Lead. In their absence, a suitable proxy will be assigned. Should an apprentice trainer or employee of VHL have a concern regarding the Prevent duty related to an apprentice they should report their concerns to the DSO. The DSO of VHL has an obligation to report any concerns to the individual at the apprentices' employer who has responsibility for the Prevent duty.
- i) The same is true if any employee or apprentice trainer has a concern regarding a colleague or other professional.

- j) 10. Enquiries and Investigations; where outside agencies are involved in any Prevent duty incident or reported issue, we will, when required to do so, liaise and provide information to relevant authorities, whilst ensuring that the apprentice is kept informed, where it is safe for them to be so.
- k) Data collection, storage and sharing of records of Prevent duty incidents will be retained in a safe place, together with a written record of outcomes. All data shared between the apprentices' employer, our associate apprentice trainers and VHL will be treated as confidential, unless there is a requirement to share with the appropriate local authorities, such as in a Prevent duty concern. No data shall be used in ways that might discriminate against any apprentice, apprentice trainer or VHL employee.
- l) 12. The policy and any incidents arising from the Prevent duty will be monitored on an ongoing basis by the Apprenticeships Programme Lead and overseen by the Executive Director of VHL
- m) 13. We will review our Prevent duty and policies and supporting processes annually. This will include an annual assessment of the potential risks and the context and level of Prevent duty risk posed by our work as a provider of apprenticeship training. This will feed into our risk

## **16. LEADERSHIP**

The Centre takes seriously at the highest levels the need to prevent extremism or terrorism occurring in our community. Our approach has been approved by the Head of Centre, and by the Board of Governors. The PVC Student Engagement has been identified as the member of senior management responsible for ensuring that the Centre complies appropriately with the Prevent Duty, in liaison with the Centre's Prevent Coordination Group (PCG) together with other key stakeholders within and beyond the Centre.

## **17. STRATEGY**

In order to achieve these objectives, the strategy will concentrate on four areas;

### **a) Leadership and Values**

To provide an ethos which upholds core values of shared responsibility and wellbeing for all apprentices and other learners, employees and visitors and promotes respect, equality and diversity and understanding. This will be achieved through:

- Promoting core values of respect, equality and diversity, democratic society, learner voice and participation
- Building employees and apprentices and other learners understanding of the issues and confidence to deal with them deepening engagement with local communities
- Actively working with local schools, local authorities, police and other agencies

### **b) Teaching and Learning**

To provide a curriculum which promotes knowledge, skills and understanding to build the resilience of learners, by undermining extremist ideology and supporting the learner voice. This will be achieved through:

- Embedding equality, diversity and inclusion, into all learning interventions.

- Promoting wider skill development such as social and emotional aspects of learning
- Encouraging active citizenship/participation and learner voice.

### **c) Learner Support**

To ensure that employees are confident to take a proactive approach to the promotion of British values. This will be achieved through:

- Establishing strong and effective apprentices and learner support
- Understanding better our local communities and the needs of learners, their families and communities
- Implementing anti-bullying strategies and challenging discriminatory behaviour Supporting at risk students through safeguarding procedures
- Continuing focus on narrowing the attainment gap for all apprentices and other learners
- Challenging unacceptable behaviour

### **d. Managing risks and responding to events**

To monitor risks and be ready to deal appropriately with issues which arise. This will be achieved through;

- Understanding the nature of the threat from violent extremism and how this may impact directly or indirectly on our organisation and its activities
- Responding appropriately to events in local, national or international news that may impact on students and communities
- Ensuring plans are in place to respond appropriately to a threat or incident Further developing effective ICT security and responsible user policies.
- To ensure that employees are confident to take a proactive approach to the promotion of British values. This will be achieved through:
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## **18. REFERRAL PROCESS**

The process used to handle anti-terrorism (Prevent) and anti-radicalisation is called a channel referral process. Channel is the name for the process of identifying and referring a person at risk of radicalisation for early intervention and support.

It is a multi-agency approach to protect vulnerable people. It uses collaboration between local authorities, statutory partners (such as education and health organisations, social services, children's and youth services and offender management services), the police and the local community.

VHL will make information on the local reporting arrangements for the channel referral process available to employees, associates, apprentices and other learners at induction and on a secure part of our website. More comprehensive information can be provided upon request from the Apprenticeships Programme Lead who is our Prevent duty lead.

Some Prevent or anti-radicalisation concerns may have a security dimension to them. For this reason, it is important that liaison with the police forms an early part of all investigations. The emphasis is on early intervention to protect and divert people away from the risk they face before being drawn into committing terrorist-related activity.

## **19. ROLES AND RESPONSIBILITIES**

### **a) Board of Governors**

As required by the 2015 Act, the Centre's response to Prevent is managed by the Centre's Prevent Coordinator. An annual report is provided to Management Board and the Board of Governors.

Whilst this is a standalone policy, it is integral to our Safeguarding Policy and should be applied as an extension to the College's current and established safeguarding procedures.

All Board Members have a legal responsibility under the Prevent Duty to make sure they have undertaken training in the Prevent Duty. Additionally, the Board must ensure that:

- All College staff have undertaken training in the Prevent Duty;
- All College staff are aware of when it is appropriate to refer concerns about students, learners or colleagues to the Safeguarding Officer;
- All College staff exemplify British Values into their values;
- Policies and procedures to implement the Prevent Duty are in place and acted on where appropriate.

### **b) Prevent Lead for the College**

The Student Services Director is the Prevent Lead and Designated Safeguarding Lead, with responsibility for ensuring that our Prevent Strategy is implemented across the College and that any concerns are shared with the relevant organisations, in order to minimise the risk of our students becoming involved with terrorism.

### **c) College Safeguarding and Prevent Board**

The Safeguarding and Prevent Board meet termly, and any concerns raised under the Prevent agenda or changes to the Duty that affect the College are discussed within this Board.

### **d) All Staff**

All staff at the College have a responsibility to:

- Create and support an ethos that upholds the College's mission, vision and values including British Values, to create an environment of respect, equality and diversity and inclusion;
- Attend Prevent training in order to have the skills to recognise those who may be vulnerable to radicalisation, involved in violent or non-violent extremism, and to know the appropriate action to take if they have concerns;
- Report any concerns around extremism or radicalisation via the safeguarding reporting channels; □ report and remove any literature displayed around the College that could cause offense or promote extremist views;
- Support the development of staff and student understanding of the issues around extremism and radicalisation through activities such as training, awareness campaigns and tutorials;
- Participate in engagement with local communities, schools and external organisations as appropriate.

## **20. RISK ASSESSMENT AND ACTION PLAN**

As required by the Prevent Duty, the Centre has carried out an assessment of the risk of our students being drawn into extremism or terrorism. This risk assessment is reviewed at least termly by the Centre's Management Board. Where any significant risk is identified consideration is given as to what action might mitigate the impact/likelihood of that risk crystallising, and, if necessary, this is included in the Centre's Prevent Action Plan attached to the specific risk.

## **21. EXTERNAL SPEAKERS**

The Centre's Code of Practice on Freedom of Speech has been updated to reflect the Prevent Duty. It sets out how we will ensure that we meet the different legal requirements on us, not least the duty under the Education (No. 2) Act 1986 to secure freedom of speech within the law.

In complying with the Prevent Duty the Centre will not:

- Provide a platform for any proscribed extremist organisation or encourage terrorism or extremism in any way;
- Allow gender segregation at any event it organises<sup>2</sup>.

The Prevent Coordinator will undertake a consistent assessment of all proposed events and speakers through reference to the Home Office 'Inform' process and Security Services Red Amber Green/Single Point of Entry (RAG/SPOE) Speaker Reference Protocol to provide a security narrative and risk assessment.

Staff, who may be deemed vulnerable to being drawn into terrorism will be reported to the Prevent Coordinator who will make an assessment and liaise with the Director of HR who together with the Head of Centre will determine what action is to be taken.

## **22. SECURITY SENSITIVE RESEARCH**

The Centre recognises that the research and study of terrorism is valid and valuable, and that staff and students should be able to undertake this without risk of prejudice. It is therefore acknowledged that certain staff (and exceptionally students) will have need to access material which supports terrorism as part of their work. In such cases it is incumbent on the responsible member of academic staff to ensure via the

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<sup>2</sup> There is a specific exception in the use of single-sex prayer rooms.

Centre's normal ethical review processes that material is only accessed that is appropriate for the research or other work being carried out and that its use will not encourage terrorism in any way. This may include the use of an electronic and / or physical 'safe room' (as is already required by some funders for some security sensitive research). For the protection of the individual and the Centre, we now require any individual who needs to access such material to register this in advance with the Prevent Coordinator.

### **23. STAFF TRAINING**

We will carry out training on a regular basis for all relevant staff so that they can recognise those who are vulnerable of being drawn into terrorism and potential signs of radicalisation. Staff will be trained via the following 'Tier' process so that tailored training can be provided according to need:

- **Tier 1:** An e-module providing basic information on the Prevent process suitable for all staff;
- **Tier 2:** Bespoke training, covering legal referral routes, duties and case studies, for Directors of Learning and Teaching/Deans and other senior School staff;
- **Tier 3:** Specialist provision, including a police briefing, for staff including, but not exclusively, those employed in Student Services, the Students' Union staff, staff associated with international student welfare provision, accommodation and equality and diversity;
- **Tier 4:** Briefing on legal compliance and risk assessment on reputational integrity for senior management.

Training requirements explicitly to include the primacy, inherent in the statutory provision, of supporting vulnerable students and staff in accordance with the original Act and subsequent monitoring criteria.

Training to include mandatory referral to Prevent Coordinator, in the first instance, in the following situations:

- Where a potential hate crime is identified;
- Where potential racism, homophobia, or other LGBT issues, cultural cohesion issues, geopolitical conflict/context or ideological issues/narratives, are present;
- Where there is evidence of social isolation, and/or cultural alienation in the student body, and particularly in the Centre 'Forced Migrant' population;
- Where bereavement, grief or loss are present in regard to any of the above;
- Forced marriage or issues related to modern day slavery;
- Where there is obvious, or suspected, extremist narrative present in the Centre community.

### **24. PASTORAL CARE**

Pastoral care is available to students in a variety of ways including, but not exclusively, specialist support provided through Chaplaincy, Student Services and personal tutors. The Students' Union also provides welfare support. Matters of discipline are dealt with separately under student disciplinary processes subject to 2.6.2 and 2.6.3.

### **25. FAITH FACILITIES**

The Centre seeks to ensure that appropriate provision is made for those of any faith (or those without faith) to access appropriate facilities for pastoral care and for religious purposes. Managed by the Centre's Chaplaincy, all prayer rooms are governed by a Prayer Room Protocol and are considered to be multi-faith. It is not permitted that any faith facilities are controlled by any single student population or group.

## **26. IT NETWORKS**

We consider it unacceptable for our IT networks to be used in any way that supports, promotes or facilitates terrorism. We will reference Prevent in our relevant IT policies and will keep under regular review the possible use of filters as a means of restricting access to content covered by the Prevent Duty as part of our risk assessment process and in discussion with other universities. Social media provides new avenues for the distribution and accessing of extremist material, and the Centre takes the challenges presented by social media very seriously. If any misuse of the Centre's branding on social media accounts is discovered then action will be taken in accordance with the terms and conditions of the relevant platform.

## **27. COMMUNICATIONS**

We will not permit material supporting extremism or terrorism to be displayed within Centre premises and will remove any such material if it is found. Likewise, we will seek to ensure that the Centre's printed and electronic communications (including its website) do not contain or support terrorist material, or material likely to encourage terrorism, and will investigate immediately if any such instances are raised. It is acknowledged that there will be legitimate reasons to display materials relating to terrorism as part of legitimate teaching and research activities, and this should be declared under the process described in paragraph 2.5.1 above.

## **28. STUDENTS' UNION**

The Centre works closely with the Students' Union in ensuring that we provide excellent support to our students. This includes the various matters covered by this document. Students' Union staff and Officers will participate in the Prevent training being provided by the Centre and will be aware of the duty of the Students' Union to protect students on campus from dangerous or radical bodies.

The Centre requires that the Students' Union ensures that no religious, spiritual or philosophical event hosted by students may be permitted unless hosted by a recognised SU society and that any society wishing to host such an event will communicate with SU officers who will pass the proposed booking and speaker history to the Prevent Coordinator at least 30 days in advance of the proposed event.

Through working in partnership with the Students' Union at the Centre will ensure that students are consulted on an ongoing basis on how we are implementing the Prevent duty.

## **29. INFORMATION SHARING**

The Centre is aware of the Channel process and of the opportunities for informal and formal sharing of information with relevant authorities. We will use these when we

consider it is necessary and appropriate to do so in the interests of preventing people from being drawn into terrorism. Information sharing will only take place with external authorities when this is consistent with the provisions of the Data Protection Act.

All members of staff will be made aware of the Centre's responsibilities under the Prevent Duty and of the measures set out above to comply with it. Members of the Centre community who are concerned about a student who might be at risk of being drawn into terrorism should report this to their line manager who will then contact the Prevent Coordinator. The Prevent Coordinator will assess the situation and, where necessary, liaise with the Centre Student Engagement before contacting the appropriate police unit.

### **30. SIGNIFICANT MATERIAL CHANGES**

We will notify the Police in a timely manner of significant material changes, which affect the way in which they are delivering their responsibilities under the Prevent duty. The Prevent Coordinator will provide an explanation of the change and its likely impact on the way in which it will deliver its responsibilities under the duty. VHL expects Prevent leads to be made aware of relevant material changes. Such changes include:

- Significant changes to policies or processes relating to the Prevent duty (i.e. a significantly changed Prevent-related policy, or a major revision to a process)
- Changes of responsibility for Prevent (for example, appointing a new Prevent lead)
- Changes of control (for example, new governance structures which change the oversight of the Prevent duty)
- Changes to location (including the addition of a new campus or site anywhere in the UK)
- Significant changes to teaching provision where it has an impact on Prevent-related policies (for example from online to face-to-face provision, or significant changes to partnership arrangements, such as sub-contractual teaching arrangements that impact upon Prevent-related considerations).
- Significant changes in the support provided by a Prevent partner (for example as provided by a Regional Prevent Co-ordinator). The Prevent Coordinator will explain the impact of such changes on its ability to deliver its responsibilities under the duty and provide evidence of alternative sources of support (e.g. for the provision of face-to-face training).
- Where there has been a major change to a policy or process, which relates to the duty, the Prevent Coordinator will explain and submit to Centre a revised copy of the relevant documentation.

### **31. RELATED POLICIES AND PROCEDURES**

The following policies and procedures are related to the Prevent Policy:

- Code of Practice on Freedom of Speech
- Guidelines on Religion or Belief
- Prayer Room Management Protocol
- IVP Prevent Risk Assessment
- Electronic Communications Policy
- Student Incident Policy
- Student Disciplinary Procedure

### **32. SAFER RECRUITMENT OF LEARNERS**



Verity Healthcare Limited undertakes to ensure that its learners are suitable to study in a training provider setting. It also reserves the right to refuse entry to any applicants whom it has a reasonable belief may pose a risk to learners. To ensure this is addressed appropriately Verity Healthcare Limited will:

- Help to facilitate DBS checks for learners going in to relevant industries (education, working with vulnerable adults, charities, healthcare etc)
- Attend case conferences at all feeder schools & colleges (if required)
- Complete relevant risk assessments of ex-offenders

### **33. WORKING WITH OTHER AGENCIES**

Verity Healthcare Limited has developed effective links with other relevant agencies, for example, the Local Authority, Children's Social Care, Channel, GMP, and the MSCB and co-operates as required with any enquiries regarding child protection issues.

### **34. GOOD PRACTICES**

To meet and maintain our responsibilities towards learners, we agree to standards of good practice which forms a code of conduct for all staff. Good practice includes:

- Treating all learners with respect
- Setting a good example by conducting ourselves appropriately
- Involving learners in decisions that affect them
- Encouraging positive, respectful and safe behaviour among learners
- Being a good listener
- Being alert to changes in learner's behaviour and to signs of abuse, neglect and exploitation
- Recognising that challenging behaviour may be an indicator of abuse
- Reading and understanding the Staff Code of Conduct
- Maintaining appropriate standards of conversation and interaction with and between learners and avoiding the use of sexualised or derogatory language
- Being aware that the personal and family circumstances and lifestyles of some pupils lead to an increased risk of abuse.
- Referring all concerns about learner safety and welfare to the DSL or if necessary directly to the Police or Children's social care.
- Following the Use of Internet, Email & Social Media Usage Policy.

### **35. STAFF DEVELOPMENT AND TRAINING**

Verity Healthcare Limited's Safeguarding policy, procedure and accompanying guidance will be issued to all new staff as part of their induction. All staff will be supported to recognise warning signs and symptoms in relation to specific safeguarding issues and will receive training or briefings on for example, Guns and Gangs, Forced Marriage, Female Genital Mutilation, Domestic Abuse, Child Sexual Exploitation, Trafficking and Preventing Violent Extremism through mandatory Safeguarding Level 1 training and update briefings with a refresher every 3 years.

### **36. ONLINE SAFETY**

Verity Healthcare Limited has an Online Safety Policy which recognises that Online Safety is a safeguarding issue not an ICT issue. The purpose of internet use in the Centre is to help raise educational standards, promote candidate achievement, and support the professional work of staff as well as enhance the school's management information and business administration. The Use of Internet, Email & Social Media Usage Policy explains how VHL explains how we try to keep learners safe in the educational setting and protect Learners in the safe use of technology.

The internet is an essential element in 21st century life for education, business and social interaction and Verity Healthcare Limited has a duty to provide children and young people with quality access as part of their learning experience.

It is the duty of Verity Healthcare Limited to ensure that every young person in its care is safe and this applies equally to the 'virtual' or digital world.

Verity Healthcare Limited will ensure that appropriate filtering methods are in place to ensure that pupils are safe from all types of inappropriate and unacceptable materials, including terrorist and extremist material. This will be in line with the 'Prevent Duty'.

See also:

**Online Safety Policy**

### **37. WHISTLE-BLOWING**

It is recognised that learners cannot be expected to raise concerns in an environment where staff fail to do so. All staff should be aware of their duty to raise concerns, where they exist, about the attitude or actions of colleagues. Please refer to the Speak Up Policy for further guidance.

### **38. ABUSE OF POSITION**

It is recognised that as adults working in education and training, we are in a relationship of trust with the learners in our care and acknowledge that it is a criminal offence to abuse that trust. We acknowledge that the principle of equality embedded in the legislation of the Sexual Offenders Act 2003 applies irrespective of sexual orientation: neither homosexual nor heterosexual relationships are acceptable within a position of trust. It is recognised that the legislation is intended to protect young people in education who are over the age of consent but under 18 years of age. However, it is important to note that staff should maintain appropriate boundaries with learners of all ages. Please refer to the Staff Code of Conduct for more information.

### **39. HEALTH AND SAFETY**

VHL's Health and Safety Policy reflects the consideration given to the safeguarding of learners. Risk assessments are undertaken and reviewed regularly, in respect of site security, risk of young people being drawn into terrorism or exposed to extremist behaviour, risk to and from young people displaying harmful behaviour. Please refer to VHL's Health and Safety Policy for further guidance.

### **40. USE OF IMAGES**

The welfare and protection of our learners is paramount and consideration should always be given to whether the use of photography is a risk. For this reason consent is always sought when photographing learners and additional consideration given to photographing vulnerable learners, particularly Looked After Children or those known to be fleeing domestic violence. Consent must be sought from those with parental responsibility (this may include the Local Authority in the case of Looked After Children).

### **41. SAFE ENVIRONMENT**

VHL undertakes appropriate risk assessments and checks in respect of all equipment and of the buildings and grounds in line with local and national guidance and regulations concerning health and safety.

Visitors to VHL are asked to sign in and are given an identity badge, which confirms that they have permission to be on site.

Visitors to VHL's learning environments, such as guest speakers or curriculum specialists will be appropriately checked and vetted, to ensure they are not linked to extremist groups or promoting extremist or other harmful material.

## **42. EXTERNAL SPEAKERS**

To safeguard learners from exposure to extremist views and to ensure avoidance of the learning environment becoming a platform for extremist views a Guest Speaker Risk Assessment Form needs to be completed on every occasion a guest speaker is presented to VHL's learners. VHL will carefully consider whether the views likely to be expressed by the guest speaker constitute extremist views. If this is the considered opinion then the event will not proceed unless the Associate responsible for the activity is convinced that the risk can be fully mitigated by the extremist view being challenged with the opposing view at the same event, rather than in a separate forum.

## **43. RADICALISING / EXTREMISM**

VHL encourages learners to respect the fundamental British Values of democracy, the rule of law, individual liberty and mutual respect, and tolerance of those with different faiths and beliefs. We ensure that partisan political views are not promoted in our training programmes.

We value freedom of speech and the expression of beliefs/ideology as fundamental rights underpinning our society's values. Both learners and staff have the right to speak freely and voice their opinions. However, freedom comes with responsibility and free speech that is 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, we seek to 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.

### **43.1 FACTORS OF REDICALISM / EXTREMISM**

Factors which may indicate vulnerability to extremism may include (but not limited to):

- Possession of literature regarding military training, skills and techniques
- Possession of violent extremist literature
- The expression of extremist views advocating violent actions and means
- Association with known extremists, seeking to recruit other to an extremist ideology or claims of involvement with organisations espousing extreme violence
- Exposure to an ideology that appears to sanction, legitimise or require violence
- A range of perceived grievance, real and some imagined, to which there seems to be no credible and effective non-violent response.
- 

If staff believe that a Learner or a colleague is at risk then the member of staff needs to complete a Form C (Green Form) to log a concern about a learner/colleague's safety and welfare, this form needs to be submitted to the Designated Safeguarding Lead (DSL) who will identify whether a referral needs to be made to Channel.

### **43.2 SIGNS AND INDICATORS OF REDICALISM / EXTREMISM**

There are many signs and indicators of radicalisation and extremism, most commonly individuals that are at higher risk of being targeted are those categorised as vulnerable. Vulnerable individual being classified within our safeguarding policy as a child or vulnerable adult. It is however important to note that anyone can be drawn into terrorism and therefore our culture of vigilance must be robust.

It is important to note that behaviours can develop over time and therefore building strong relationships with apprentices and employers will enable earlier intervention. Below are some signs and indicators of an individual being drawn into extremism.

- Using inappropriate language;
- Refusing to listen to different points of view;
- Unwilling to engage with individuals that have different views, faiths or ethnic backgrounds;
- Changing friends and appearance;
- Distancing themselves from old friends and colleagues;
- No longer doing things they used to enjoy;
- Converting to a new religion;
- Being secretive;
- Sympathetic to extremist ideologies and groups.

Online influences

- Spending increased amounts of time online;
- Changing identify or friends online;
- Endorsing material of an extremist nature;
- Accessing extremist content;
- Joining or trying to follow an extremist organisation.

### **44. ATTENDANCE**

Attendance is monitored and when patterns of absence give rise to concern, we will discuss this further with the Learner and employer, and where appropriate the parents.

### **45. CHALLENGE AND ESCALATION**

VHL recognises that professional disagreements may arise between any agencies and resolving problems is an integral part of co-operation and joint working to safeguard young people/vulnerable adults.

As part of our responsibility for safeguarding, we acknowledge that we must be prepared to challenge each other if we feel that responses to concerns, assessments or the way in which plans are implemented are not safeguarding the young person/vulnerable adult and promoting their welfare.

### **46. APPRENTICE REPORTING RADICALISATION OR EXTREMISM CONCERNS ABOUT ANOTHER APPRENTICE**

Should an apprentice report a concern regarding another apprentice Exelin Ltd. will always take the issue seriously. The person receiving the information should still follow the above process.

### **47. ALLEGATIONS AGAINST EMPLOYEES OR ASSOCIATES**

VHL recognises its duty to report concerns or allegations against its employees or associates (paid or unpaid) within the organisation or by a professional from another organisation.

#### **48. PREVENT DUTY MONITORING AND EFFECTIVENESS**

By considering the implications of effective Prevent or anti-radicalisation procedures in our business and training activities, we aspire to embed British Values in all that we do as a provider of apprentice training.

To monitor and ensure the effectiveness of our Prevent Duty Policy and Procedure we undertake:

1. Annual review of this policy
2. Annual review/update of the Prevent Duty Risk Assessment with consideration of its links to this Safeguarding policy
3. Annual communication of this policy to promote the importance of Prevent and Anti Radicalisation and ensuring all trainers, employees and associates understand their responsibilities
4. Checking that related policies are up to date and relevant at least annually
5. Preparation of quarterly reports on Prevent or anti-radicalisation incidents and reported concerns for the senior management team to look at patterns or trends in order that we can learn from each incident or concern and mitigate the risk of similar issues being repeated.

#### **49. CONFIDENTIALITY**

Information will be gathered, recorded and stored in accordance with the Data Protection Policy.

All employees and associates must be aware that they have a professional duty to share information with other agencies in order to protect apprentices and other learners.

Safeguarding apprentices and other learners may override confidentiality interests. However, information will be shared on a need to know basis only, as judged by the Prevent champion, who is also our Designated Safeguarding Officer.

#### **50. MONITORING AND EVALUATION**

Our Prevent policy and procedures will be monitored and evaluated by:

- Completion of an annual safeguarding report to the Board
- Quarterly review of the Safeguarding log by the DSL and Head of Centre
- Discussions with Learners and staff
- Scrutiny of data and risk assessments
- Review of incidents

#### **51. PREVENT CONTACTS**

VHL Senior Designated Lead: Dr. (Mrs) Barbara Esther Ofori-Kyereh, Head Office

Email: Barbara.Esther@veritytrainingcentrec.co.uk

Tel: 0203 643 5295

NSPCC Helpline 0808 800 5000

Local Education Safeguarding

\*\*\* Please visit the Local Authority website for information

## **ANNEX 1**

### **What is CONTEST?**

CONTEST is the Government's Counter Terrorism Strategy, published in July 2006 and refreshed in March 2009. The aim of the strategy is 'to reduce the risk from international terrorism, so that people can go about their lives freely and with confidence.'

CONTEST has four strands, often known as the four Ps. The aims of the 4 Ps are:

- **PREVENT** - to stop people becoming terrorists or supporting violent extremism
- **PURSUE** - to stop terrorist attacks through disruption, investigation and detection
- **PREPARE** - where an attack cannot be stopped, to mitigate its impact
- **PROTECT** - to strengthen against terrorist attack, including borders, utilities, transport infrastructure and crowded places

### **What is Extremism?**

The Government has defined extremism 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". This also includes calls for the death of members of the British armed forces.

### **What is Terrorism?**

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 of 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.

### **What is radicalisation?**

People can be drawn into violence or they can be exposed to the messages of extremist groups by many means. The risk of radicalisation is the product of a number of factors and identifying this risk requires that staff exercise their professional judgement, seeking further advice as necessary. It may be combined with other vulnerabilities or may be the only risk identified. Potential indicators include:

- Use of inappropriate language
- Possession of violent extremist literature
- Behavioural changes
- The expression of extremist views
- Advocating violent actions and means
- Association with known extremists
- Seeking to recruit others to an extremist ideology

The Government has defined extremism as "vocal or active opposition to fundamental British Values", which include:

- Individual liberty
- Rule of law
- Democracy



- Mutual respect and tolerance of different faiths and beliefs.

This includes not discriminating against those with protected characteristics (Equality Act 2010), namely:

- Age
- Disability
- Gender reassignment
- Marriage and civil partnership
- Pregnancy and maternity
- Race
- Religion and belief
- Sex
- Sexual orientation

## **Channel**

### **What is Channel?**

Channel is an early intervention multi-agency process designed to safeguard vulnerable people from being drawn into violent extremist or terrorist behaviour. Generally Channel groups operate in Local Authority areas. Channel works in a similar way to existing safeguarding partnerships aimed at protecting vulnerable people.

### **Who is Channel aimed at?**

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. The partnership approach ensures those with specific knowledge and expertise around the vulnerabilities of those at risk are able to work together to provide the best support.

### **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. Each support package is tailored to the person and their particular circumstances.



**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.

**Who can make a referral?**

Anyone can make a referral. Referrals come from a wide range of partners including education, health, and youth offending teams, police and social services.

**What happens with the referral?**

Referrals are first screened for suitability through a preliminary assessment by the Channel Coordinator and the local authority. If suitable, the case is then discussed at a Channel panel of relevant partners to decide if support is necessary. Raising a concern, if a member of staff has reason to believe that someone is vulnerable to being exploited or radicalised, please use the established safeguarding or duty of care procedures within your organisation to escalate your concerns to the appropriate leads, who can raise concerns to Channel if appropriate