

PREVENT Duty Policy

Updated December 2021

Next review date: December 2022

Prevent Duty Policy

The purpose of this policy is to:

- Ensure an awareness of Prevent throughout our organisation and wider networks (e.g. subcontracting partners, employers)
- Ensure all employees of Momentum Training and Consultancy are trained to fulfil the Prevent Duty requirements
- 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 radicalising influences
- Embed British Values throughout all training and ways of working
- Recognise current practice which contributes to the Prevent agenda
- Identify areas for improvement

Who does this policy apply to?

The Prevent Duty Policy applies to everyone working at or attending Momentum Training and Consultancy and/or Subcontracting Partner training centres. It confers responsibilities on all directors, staff, learners, and contractors, visitors, consultants and those working under self-employed arrangements.

Policy Statement

The aim of the Prevent Policy is to create and maintain a safe, healthy and supportive learning and working environment for our learners, staff and visitors alike. We recognise that extremism and exposure to radicalising influences can lead to poor outcomes for learners. We further recognise that if we fail to challenge extremist views we are failing to protect our learners from potential harm. As such, the Prevent agenda will be addressed as a safeguarding concern. This policy elaborates on the Prevent Duty responsibilities stated in our Safeguarding Policy.

Momentum Training and Consultancy adopted the Prevent Duty in accordance with legislative requirements. We will endeavour to incorporate the relevant duties so as not to:

(a) Stifle legitimate discussions, debate or learner engagement activities in the local community; or

(b) Stereotype, label or single out individuals based on their origins, ethnicity, faith and beliefs or any other characteristics protected under the Equality Act 2010.

Why do we need this policy?

Background information

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

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protecting people who might be susceptible to radicalisation.

The national Prevent Duty confers mandatory duties and responsibilities on a range of public organisations, including Training Providers, 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 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.

Our Prevent Policy has five key objectives:

1. 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.
2. To breakdown segregation among different learner communities including by supporting inter-faith and inter-cultural dialogue and understanding; and to engage all learners in playing a full and active role in wider engagement in society.
3. To ensure learner safety and that our academies and partners are free from bullying, harassment and discrimination.
4. To provide support for learners who may be at risk of radicalisation, and appropriate sources of advice and guidance.
5. To ensure that learners and staff are aware of their roles and responsibilities in preventing violent and non-violent extremism.

Definitions

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.

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Aims

Leadership and Values

To create and maintain the Momentum Training and Consultancy ethos that upholds core values of shared responsibility and wellbeing for all learners, staff and visitors whilst promoting 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 staff and learner understanding of the issues and confidence to deal with them through mandatory staff training, specialist tutorials, awareness campaigns and community engagement activities.
- Encouraging engagement with local communities and faith groups.

Teaching and Learning

To provide a curriculum that promotes British Values, knowledge, skills and understanding, to build the resilience of students 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 the curriculum.
- Promoting wider skills development such as social and emotional aspects of learning.
- Challenge extremist narratives and promote universal rights.
- Teaching, learning and assessment strategies that explore controversial issues in a way that promotes critical analysis and pro-social values.
- Use of external programmes or groups to support learning while ensuring that the input supports are goals and values.

Student Support

To ensure that staff take preventative and responsive steps, working with partner professionals, families and communities. This will be achieved through:

- Strong, effective and responsive learner support.
- Developing strong community links and being aware of what is happening in the locality.
- Implementing anti-bullying strategies and challenging discriminatory behaviour.
- Recognising factors that may increase risk to a student, i.e. vulnerability, disadvantage or hardship, and implementing early risk management strategies.
- Ensuring that learners and staff know how to access support within the Company and/or via community partners.
- Supporting students with problem solving and repair of harm.
- Supporting 'at risk' learners through safeguarding and crime prevention processes.
- Focusing on narrowing the attainment gap between the different groups of students.
- Working collaboratively to promote support for students across all network members.

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Roles and responsibilities

Whilst this is a standalone policy, it is integral to our Safeguarding Policy and should be applied as an extension to the Company's current and established safeguarding procedures. The Directors have a legal responsibility under the Prevent Duty to make sure they have undertaken training in the Prevent Duty. Additionally, the Directors must ensure that:

- All staff undertake annual Prevent Duty training
- All staff are aware of when it is appropriate to refer concerns about students, learners or colleagues to the Safeguarding Officer, and the means of making such referrals
- All staff exemplify British Values in their personal and professional practices
- Policies and procedures to implement the Prevent Duty are in place and acted on where appropriate.
- All available opportunities to liaise with local Prevent co-ordinators, police and local authorities are taken to ensure the Company fulfils its duties using the most up to date and relevant guidance.

Prevent Lead for Momentum Training and Consultancy

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

All Staff

All staff within the network have a responsibility to:

- Create and support an ethos that upholds the Company'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 training centres that could cause offense or promote extremist views
- Support the development of staff and learners understanding of the issues around extremism and radicalisation through activities such as training, awareness campaigns and tutorials
- Participate in engagement with local communities, and external organisations as appropriate.

Managing Risks and Responding to Events

We will ensure that it monitors risks and is ready to deal appropriately with issues which arise through the following:

- Understanding the nature of threat from violent extremism and how this may impact directly and indirectly on the Company.

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- Identifying, understanding and managing potential risks within the network from external influences. Responding appropriately to events reported via local, national or international news that may impact on learners and communities.
- Ensuring plans are in place to minimise the potential for acts of violent or non-violent extremism within our network.
- Ensuring compliance with related policies.

Links to other Momentum Training and Consultancy policies

This policy should be used in conjunction with the following policies and procedures:

- Safeguarding Policy
- Health and Safety Policy
- Anti-Bullying and Harassment Policy
- Internet Usage Policy
- Whistleblowing Policy
- Data Protection Policy
- Disciplinary Procedures
- Equality and Diversity Policy

Who needs to understand this policy and how will they know about it?

Prevent training for all staff, learners and Directors is mandatory and will be delivered by the following methods:

Who?	How?
Learners	Policy available on the website Prevent awareness included in learner induction sessions. Information about Prevent delivered through tutorials and resources, and via attendance at and participation in Prevent and British Values related student activities.
All staff, including managers and Directors	Receive mandatory training and updates; briefings by the Company and Centre Managers. Via Newsletters/Blogs. E-mails; linking to online training. All new members of staff are to receive Prevent training as part of their induction programme.

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Policy Summary

Our commitment to meeting the Prevent Duty can be summarised as follows:

P – Promotion of Equality and Diversity and positive relationships between staff and learners

R – Referral of any concerns via Safeguarding staff to relevant authorities

E – Embedding British Values and education for students on all courses

V – Vetting guest speakers and removal of any posters or other materials of an extremist nature

E – Environment – a safe and secure learning environment

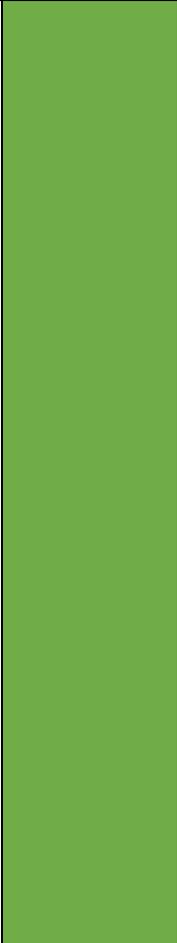
N – News monitoring for any concerns in the locality – liaising with local Prevent co-ordinators, police and local authorities

T – Training of staff to raise awareness of the signs and risks

Prevent Action Plan

Outcome	Risk/Vulnerability	Action to address risk	Owner	Evidence of progress	RAG
Leadership					
The organisation takes ownership of extremism and radicalisation concerns and appropriate oversight of the Prevent agenda is provided	There is a lack of clarity within the organisation regarding a systemic approach to respond to the Prevent duty	The organisation has an identified point of contact in relation to Prevent	Quality Director Safeguarding Leads	<p>Members of staff are trained and deliver in addition to online.</p> <p>Safeguarding Leads link with identified point of contacts internal and external following referrals.</p> <p>Active CPD</p> <p>Quality Director has attended the Eastern Region Prevent Train the Trainer course</p> <p>Company is signed up with all of the regional Prevent Leads and receive regular updates, these are shared with all centres and learners via appropriate mediums</p>	

		Directors and the Senior Management Team have an understanding, shared with stakeholders, of where and how their students might be at risk of being drawn into terrorism, including support for the extremist ideas that are part of terrorist ideology	Quality Director Safeguarding Leads	Safeguarding and Prevent Policies Review programme – Progression and My World Matters workbooks Safeguarding Meetings	
		There is active engagement from the organisation’s directors, managers and staff	Quality Director Safeguarding Leads	Quality processes are followed to ensure policies and procedures are in place and impact recorded. Observations in place, to ensure Prevent and British values work is covered. Inclusion in the organisation’s Self-Assessment Review, all stakeholders are regularly updated via the VLE blog and during one-to-one meetings	
		Prevent is included within the organisation’s safeguarding policy	Quality Director Safeguarding Leads	Separate Prevent policy in place to be read in conjunction with the Safeguarding Policy and Procedure updated in accordance with legislation.	
Partnerships					

<p>The organisation proactively supports the multi-agency delivery of the Prevent duty across the country</p>	<p>The organisation delivers Prevent actions in isolation and good practice is not shared across the county</p> <p>The organisation does not effectively share information and vulnerable individuals are not given appropriate and possible support</p>	<p>Active engagement around Prevent between directors, managers and local partners</p>	<p>Quality Director Safeguarding Leads</p>	<p>Quality processes are followed to ensure policies and procedures are in place and where necessary impact recorded.</p> <p>Observations in place to ensure Prevent and British values work is covered.</p> <p>Safeguard Lead role in place to support and co-ordinate work delivered by curriculum and partners.</p> <p>Inclusion in organisations Self-Assessment Review, updates are given to stakeholders via newsletters and meetings</p> <p>Safeguarding and Prevent meetings</p> <p>Reviews and Modern World workbooks</p>	
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		<p>Reinforce use of Modern World workbooks, these cover terrorism, radicalisation and extremism</p> <p>Reviews to be fully utilised, staff and learners to make meaningful contribution and show substantial understanding of Prevent and radicalisation</p>	<p>Quality Director Safeguarding Leads Centre Managers Delivery staff</p>	<p>All apprentices on programme are to complete Modern World workbooks. However, when learners questioned on their knowledge on Prevent matters responses are weak. Further checks to be made during lesson observations. Lesson Observation Feedback forms to reflect questioning - Completed</p> <p>During reviews discussions are held with learners on Prevent, however progress and understanding between reviews is variable.</p> <p>Further training to be given to staff understanding of Prevent and British values - mitigation work in progress.</p>	
		<p>Support the Channel project by attending and supporting multi agency Channel panel meetings where relevant</p>	<p>Quality Director</p>	<p>Currently no Vulnerable to Radicalisation referrals have resulted in escalation to a Channel Panel meeting.</p>	
		<p>Internal and external procedures in place to share information about</p>	<p>Quality Director</p>	<p>Safeguarding Policy and Procedure references sharing of information external to the</p>	

		vulnerable individuals including information sharing agreements.		<p>Company will take place within the framework outlined by 'Information Sharing' (DfE, July 2018) and Working Together to Safeguard Children. Consent for sharing this information will be gained wherever possible.</p> <p>When a young person or vulnerable adult leaves the organisation, the Safeguarding Lead will make contact with the Safeguarding Lead at the new organisation and will ensure that the safeguarding file is forwarded to them in an appropriately agreed manner. We will retain evidence to demonstrate how the file has been transferred; this may be in the form of a written confirmation of receipt from the receiving college and/or evidence of recorded delivery.</p>	
The organisation has a clear understanding of the local risks related to extremism and radicalisation.	The organisation does not access available intelligence leading to a failure:	Support the process of the Counter Terrorism Local Profile including attending multi agency briefings and providing relevant information and input to the process	Quality Director	<p>QD to contact local and national Chanel Groups to request attendance and attendance at multi agency briefings</p> <p>The GM has contacted the Eastern Region Chanel representative, but</p>	

	<p>a) to develop a comprehensive action plan</p> <p>b) effectively support vulnerable individuals</p>			<p>no Chanel meetings are projected to be held in the near future</p> <p>Effective reporting procedures are in place. This are well known by all staff and centres</p>	
		<p>Staff are briefed on local risk to students</p> <p>Students are engaged and consulted on plans to implement Prevent duty</p>	<p>Quality Director</p>	<p>Apprentices are involved in tutorials around Prevent and British values, also have Modern World workbooks to complete which covers subjects such as extremism.</p> <p>Organisation has a poor understanding of regional extremism concerns and trends that could impact on apprentices and staff</p> <p>All local and national risks are not understood, i.e. knife crime and county lines. Further research and work need to be completed to mitigate risks.</p> <p>Further development of Modern World workbooks to cover subject areas and Blogs to be included in communications</p>	

				Additional training to be given to staff and centres to include local issues	
Capabilities					
Front line staff (including those in contracted services) have a good understanding of Prevent and are able to recognise vulnerabilities	Vulnerable individuals will not be identified or supported and will therefore potentially be drawn further into radicalisation	Training programme including targets is planned with proportionate level of training determined for all staff groups	Quality Director	Prevent training is given to all staff including all partner organisations	
		Staff attend appropriate training and training impact assessment is carried out			
		Places on Prevent training are made available to partner organisations			
		All staff are briefed on referral process; relevant information on Prevent duty and key personnel are readily accessible			
		The organisation monitors and reviews the number of			
				All partner sites must complete Prevent and Safeguarding and maintain competency	
				All staff are aware of reporting procedures	
				Regular updates on Prevent matters are given in newsletters	
				There have been no Prevent referrals made. However clear procedures are in place.	

		referrals being initiated. This information is used to inform risk assessment process and subsequent actions			
Resources					
The organisation's venues and resources do not provide a platform for extremists and are not used to disseminate extremist views	Online radicalisation, which can include accessing inflammatory material or online grooming, is an ever increasing danger and can affect even the most remote rural areas	Ensure that IT equipment owned by the organisation is covered by appropriate security software and firewalls to limit extremist material	Quality Director	Organisational IT Systems are to have checks in place to block material which is linked to discrimination/hate. Reports are reviewed by Safeguarding Coordinator.	
		IT policies are in place to ensure that staff and students are protected from terrorist related content		Review and strengthen IT policies to ensure learners and staff are protected from extremist content	
		Protocols are in place to share information on events with partner agencies		Ensure all partner organisations are informed about development opportunities. CPD in subject area to be delivered at company events. Information is shared with partners	

PREVENT REGIONAL CO-ORDINATORS

OVERALL CO-ORDINATOR

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