



## Prevent Policy

### Monitoring and Version Control

Author	Ashleigh Gorton
Owner	Ashleigh Gorton
Last update	30/03/2023 - intermediary check 27/11/2023
Next Review	01/07/2024
Version	V1.1
Signatories	 Ashleigh  Mitchell

# Contents

<u>Policy Objective</u>	<u>3</u>
<u>Objectives/Scope</u>	<u>3</u>
<u>Classifications</u>	<u>4</u>
<u>Prevent Lead</u>	<u>4</u>
<u>Promoting the Prevent Policy</u>	<u>4</u>
<u>Prevent Duty Expectations of The Marketing Trainer Stakeholders</u>	<u>5</u>
<u>The Marketing Trainer</u>	<u>5</u>
<u>Expectation of Employers</u>	<u>6</u>
<u>Expectation of All Staff (Including Delivery)</u>	<u>6</u>
<u>Expectation of Apprentices</u>	<u>7</u>
<u>External Associates</u>	<u>7</u>
<u>Apprentice Safety and Curriculum</u>	<u>8</u>
<u>Referral Process</u>	<u>8</u>
<u>Recording any Safeguarding/Prevent incidents</u>	<u>9</u>
<u>Review of the Policy</u>	<u>9</u>
<u>Annual Review of the Policy</u>	<u>9</u>
<u>Senior Management Team Meetings</u>	<u>10</u>
<u>Prevent Contacts</u>	<u>10</u>
<u>Coventry</u>	<u>10</u>
<u>Warwickshire Council</u>	<u>10</u>
<u>Birmingham</u>	<u>10</u>
<u>National Prevent Strategy</u>	<u>11</u>
<u>National Channel Guidance</u>	<u>11</u>
<u>Appendix</u>	<u>12</u>
<u>Appendix 1 : Vulnerabilities and Indicators</u>	<u>12</u>
<u>Appendix 2: Disclosure Recording Form</u>	<u>12</u>
<u>Appendix 3: External Speakers Policy</u>	<u>13</u>
<u>Prevent Duty: Risk Assessment &amp; Action Plan Template</u>	<u>15</u>

## Policy Objective

We have a duty to have a Prevent policy in place to help prevent individuals being drawn into terrorism, as per the government **Counter-Terrorism and Security Act 2015**.

***This policy is informed by the following legislation and guidance:***

- ***Counter-Terrorism and Security Act 2015***
- ***Prevent Duty Guidance for England and Wales 2015***
- ***Keeping Children Safe in Education 2023***
- ***UK Council for Internet Safety (UKCIS) guidance***

The Government has a duty to have a counter-terrorism strategy in place, and we have a duty to support the strategy, in line with the following:

- **Prevent** terrorism – stop people from becoming terrorists
- **Pursue** terrorism – stop and disrupt any terrorist acts and plans
- **Protect** against terrorism – strengthen the protection in the UK
- **Prepare** to deal with terrorism – help reduce the impact of attacks that can't be prevented

We support the Government in helping reduce the threat of potential terrorist attacks by implementing this Prevent policy. The aim is to minimise the threat of terrorism by stopping people from becoming radicalised, supporting terrorism or becoming terrorists themselves.

There are three stages to help with this:

1. Work with institutions, such as Government agencies and local authorities and address any risks of radicalisation
2. Prevent apprentices from being drawn into terrorism by providing support and advice through various channels, such as the curriculum.
3. Respond to the idealism and challenge any terrorism we face by those who promote it

## Objectives/Scope

We will ensure the following:

- Individuals, such as apprentices and staff will undertake training in Prevent Duty.
- Staff and apprentices will be aware of when to refer concerns about apprentices or colleagues to the DSO (Designated Safeguarding Officer)
- Reflect values of “democracy, the rule of law, individual liberty and mutual respect and tolerance for those with different faiths and beliefs” into everything conducted.
- Senior management have procedures in place to share information internally and externally regarding vulnerable adults, which is done in a secure and timely manner.

The policy is designed for all staff and apprentices, including those associated with The Marketing Trainer, such as external speakers.

## Classifications

**Terrorism:** An act of terror that is based on an objective with a political agenda, whether that be nationalism, ethnicity, religion, social class or ideology.

**Extremism:** “An ideology that completely opposes the mainstream attitudes of society, especially those opposed to British values of the rule of law, democracy, individual liberty and mutual respect for the tolerance of differing beliefs and faiths. We also include in our definition of extremism calls for the death of members of our armed forces, whether in this country or overseas.” (Gov)

**Radicalisation:** this is the process by which groups or individuals adopt extremist values that oppose and undermine the status quo.

## Prevent Lead

**Name:** Ashliegh Gorton

**Position:** The Marketing Trainer Director

**Phone:** 07983 511731

**Email:**

✉ [Prevent@themarketingtrainer.co.uk](mailto:Prevent@themarketingtrainer.co.uk)

✉ [Ash@themarketingtrainer.co.uk](mailto:Ash@themarketingtrainer.co.uk)

## Promoting the Prevent Policy

- Prevent Policy is available to view and download on our website.
- British Values posters in classrooms.
- Policy in Apprentice handbook.
- Mandatory Prevent training in apprentice induction and manager inductions.
- Prevent awareness discussion in progress reviews.
- Prevent Policy feedback in monthly 1-1 sessions.
- Mandatory Prevent Policy training for all staff, on a minimum of an annual basis.
- British Values and e-safety modules embedded into the curriculum.
- Safeguarding newsletters distributed to apprentices and managers to raise awareness of any information they may need to stay vigilant for anyone who may be at risk.

## Prevent Duty Expectations of our Stakeholders

The overall purpose of the Prevent policy is to ultimately protect the apprentices and employees from radicalising influences.

We ensure there are secure procedures to share information about vulnerable individuals, both internally and externally.

Contribute to improving the Prevent Policy, by offering feedback on areas of improvement. This is to ensure the safeguarding processes are not hindered in terms of their effectiveness to make referrals or raise concerns.

## The Marketing Trainer

The Designated Safeguarding Officer will be trained in all of the latest Prevent Duty Awareness training from the Gov, such as 'Education and Training modules and local authorities, so they are able to provide advice and training to all members of staff in working towards protecting individuals from the risk of radicalisation.

One of the goals is to promote fundamental British values amongst apprentices and help enable them to challenge extremist or radical views within a safe environment. We encourage students to respect other people with regard to the protected characteristics set out in the Equality Act 2010.

We provide Prevent Awareness training on an annual basis, or whenever there is new training needed to be conducted, to all staff, apprentices and anyone else required. Training will include the completion of online modules, such as from the 'Education and Training Foundation', along with group training sessions from the Prevent Lead.

Prevent training will also be embedded into the curriculum of every apprenticeship standard, such as e-safety training.

We monitor social media platforms used by apprentices to identify and respond to any radicalisation-related content. This will be done by using social listening tools.

We ensure our IT policy matches the goals set out to reduce the risk of radicalisation by ensuring that everyone is safe from terrorist and extremist material when accessing the internet by ensuring a filter is in place.

This policy applies to all apprentices who use company-owned or managed computer equipment, including desktops, laptops, tablets, and smartphones.

We enforce this policy by:

- Restricting access to websites only necessary for their work-related tasks. Access to online gaming, gambling or adult content is strictly prohibited.
- Monitoring and recording the activity of apprentices when using company hardware. This includes web browsing history and content accessed.
- Reporting any attempt to access inappropriate or unauthorised websites.
- Reserving the right to block access to any website it deems inappropriate or harmful to company resources.
- Apprentices are responsible for notifying their supervisor or IT department if they come across any suspicious or potentially harmful websites.
- Apprentices should never share their login credentials with anyone, including colleagues or supervisors.
- We keep our filtering system up to date with the latest information from the Government.

- When applicable, we log when apprentices may have to search for terrorism and counter-terrorism for education purposes, such as when it is required by the curriculum.
- We also utilise The Joint Information Systems Committee (JISC) to ensure the safeguards are in place to keep apprentices safe online.

## Expectation of Employers

We use Safeguarding newsletters, which include Prevent Duty information on there, and manager inductions to train employers to be able to do the following:

- Inform us of any issues pertaining to the apprentice, so that a follow-up can be had on the underlying reasons.
- Offer channels for staff members to express their worries regarding extremism, current events, and adherence to British values.
- Stay vigilant for any alterations apprentice's demeanour that, according to their own expertise, are reason for apprehension.

## Expectation of All Staff (Including Delivery)

All employees are required to complete annual training about preventing radicalisation and terrorism, this will include group training from the DSO and completion of any Gov required online modules, such as training from the 'Education and Training Foundation'.

This will allow employees to understand:

- Vulnerabilities which make an individual a potential target of radicalisation
- Indicators which suggest an individual may be being radicalised
- How and when to make a referral

Refer and report any individual who is suspected to become radicalised.

Any concerns can be raised through the following ways:

1. The safeguarding process (See Safeguarding Policy)
2. Contact the Prevent Lead (Details on Page 4)
3. Contact the local police force (dial 101 or 999 depending on severity)
4. Email [counter.extremism@education.gsi.gov.uk](mailto:counter.extremism@education.gsi.gov.uk).

All staff, as part of the indication and ongoing training, will be provided guidance on how to refer to any issues and how the Prevent Duty is a serious part of their role. See Appendix 1 which shows how to identify indicators and vulnerabilities. Identifying risk early on allows better chances of intervention and is a crucial part of the process.

Information on all legal documents, policies, training resources and additional material to help with extending knowledge and challenging extremism is provided to all and can be requested via Human Resources.

## Expectation of Apprentices

All apprentices are required to complete the induction process which includes training and reviewing the Prevent policy. This will involve guidance on how to identify and report any individual who is suspected of showing signs of radicalisation.

Any concerns can be raised through the following ways:

- 1.The Safeguarding process for referral or the referral process listed below
- 2.Contact the Prevent Lead
- 3.Contact local police force (dial 101 or 999 depending on severity)
- 4.Email [counter.extremism@education.gsi.gov.uk](mailto:counter.extremism@education.gsi.gov.uk).

## External Associates

All apprentice employers and any associates will be provided with the Prevent Policy during inductions, and their duties will be made clear. Processes are in place to enforce the Prevent Duty, and to ensure there are clear ways to raise any concerns.

However, we will refuse entry to those speakers whose values are contrary to The Marketing Trainer's own and who may wish to engage with us to promote extremist views, see External Speakers Policy.

## Apprentice Safety and Curriculum

The aim is to build resilience within apprentices to combat the threat of radicalisation, raising awareness of issues and challenge extremism.

This can be done by helping demonstrate British Values:

- Challenge Discrimination
- Rule of Law
- Democracy
- Understanding and tolerating differing faiths
- Individual liberty

The above values are promoted as they are facilitated with the apprenticeship. This includes providing the current resources which promote the Equality and Diversity Policy and the Safeguarding resources. Apprentices will also have work tasks related to British Values embedded into the curriculum. All policy documents will be made available, and guidance and training will be provided.

## Referral Process

We want all our staff and apprentices to feel safe when raising their concerns, this includes them not needing to fear being accused of discrimination. Below is the referral process for an individual, whether they are an apprentice or staff member of The Marketing Trainer.

### **Notice - Check - Share**

**The first stage** is to be observant and look for any signs that someone may be at risk of radicalisation. These signs may include changes in behaviour, low self-esteem, changes in routine, a sense of 'us versus them', fixed beliefs, scripted speech, a sense of grievance, conflicts over religious views, and changes in language.

*Appendix 1* provides guidance on identifying vulnerabilities and indicators that may indicate a risk of radicalisation.

It is important to note that displaying a few indicators does not necessarily mean that an individual is at risk of radicalisation. However, in all cases of concern, it should be reported to the Designated Safeguarding Officer (DSO) or a member of the SMT.

If you notice any of these signs, check whether they are linked to other safeguarding concerns. If so, refer the person to your Safeguarding lead. If radicalisation is suspected, it is essential to contact the Prevent Lead immediately.

**The second stage** involves making a Prevent referral. You should raise your concern with your Prevent lead within your organisation, who will then guide you on what to fill out in the Referral form in Appendix 2, which will then be sent to the Prevent Lead. *If there is an immediate threat of danger contact the Police Prevent team as soon as possible 024 7678 8555.*

There should also be awareness of other safeguarding concerns related to radicalisation and contact Coventry's safeguarding services through Coventry Direct or complete an Early Help Assessment for children under 18 or under 25 with special educational needs and disabilities.

**The third stage** involves the Channel Panel taking over the process. This group assembles multiple stakeholders, such as the Local Authority, Educational Institutions, Healthcare Providers, Probation, Police, and community members, to aid individuals who are susceptible to radicalisation by offering customised protective measures. The Channel program's effectiveness is greater when interventions occur earlier, making it critical to refer individuals as soon as possible.

## Recording any Safeguarding/Prevent incidents

We record all Safeguarding and Prevent incidents, they will be stored electronically and will be backed up via cloud storage. On a monthly basis, the DSO will look at the data collected to identify any themes or trends and look to amend the policy as a matter of urgency to mitigate the risks.

Possible Actions:

- Training could be required for all staff members to combat a new risk
- Policies are updated/new policies created which factor in new risks and preventative measures



# Review of the Policy

## Annual Review of the Policy

The Board of Directors are responsible for implementing and monitoring the Prevent Policy, along with the DSO. The number of Prevent-related cases will be reviewed on a regular basis. We liaise with any relevant governing bodies, employers and apprentices to ensure the Prevent policy is robust and competent.

We adhere to the following process:

The process comprises policy monitoring, review, planning, implementation, and periodic evaluation. At a minimum, this cycle will be repeated annually, unless immediate changes are required.

This policy and the associated guidance and procedures document will be reviewed annually by the Board and within four weeks of a review of any serious Prevent Duty related incident.

This policy and the associated guidance and procedures document is to be made available to all staff and apprentices in various formats appropriate to our audiences, e.g. in Apprentice Handbooks, on the website etc.

We record all Prevent incidents, using the referral form, and keep them stored electronically and securely, with backups. On a monthly basis, the Prevent Lead will look at the data collected to identify any themes or trends and look to improve the policy in order to mitigate the risks.

Possible Actions:

- Training would be required for all staff members in order to combat a new risk.
- Policies are updated/new policies created.

## Senior Management Team Meetings

As part of all SMT meetings, Prevent will always be a point on the agenda to discuss any concerns. Any immediate concerns will be dealt with initially without requiring an SMT meeting to take place.

## Prevent Contacts

### Coventry

Tel: 0345 113 5000

Website: [https://www.coventry.gov.uk/info/41/community\\_and\\_living/3057/prevent/5](https://www.coventry.gov.uk/info/41/community_and_living/3057/prevent/5)

Contact: Manjeet Pangli

## Warwickshire Council

Tel: 0800 789 321

Website: <https://www.warwickshire.police.uk/advice/advice-and-information/t/prevent/prevent/>

Contact: Chloe Barnes

## Birmingham

Tel: 0800 789 321

Website: <https://west-midlands.police.uk/specialist-teams/counter-terrorism>

Contact: Simon Cole

## National Prevent Strategy

[https://www.gov.uk/government/uploads/system/uploads/attachment\\_data/file/97976/prevent-strategy-review.pdf](https://www.gov.uk/government/uploads/system/uploads/attachment_data/file/97976/prevent-strategy-review.pdf)

## National Channel Guidance

[https://www.gov.uk/government/uploads/system/uploads/attachment\\_data/file/118194/channel-guidance.pdf](https://www.gov.uk/government/uploads/system/uploads/attachment_data/file/118194/channel-guidance.pdf)

## Monitoring and Version Control

Author	Ashleigh Gorton
Owner	Ashleigh Gorton
Last update	30/03/2023 - intermediary review 28/11/2023
Next Review	01/07/2023
Signatories	
Ashleigh Gorton	

Arron Cheshire	
----------------	---

## Appendix

### Appendix 1 : Vulnerabilities and Indicators

#### Vulnerabilities:

- The desire to belong and fit in with a group
- Feelings of isolation or social exclusion
- Influence from peers
- Unstable home life
- Experience of bullying
- Impact of media messages
- Exposure to extremist content
- Desire for revenge
- Need for acceptance

- Search for purpose or direction
- Struggling with academic achievement
- Recent religious conversion or change in beliefs
- Shift in behaviour due to new influences
- Radicalisation through extremist networks
- Enduring a series of traumatic events
- Rejection from social, familial, or religious groups
- Pressure from an individual associated with extremist ideologies
- Experience as a victim or witness of hate crimes based on race or religion
- Confusion regarding personal identity
- Conflict with family regarding religion, politics, or lifestyle choices
- Experience of poverty or social disadvantage
- Possession of literature related to extremist beliefs

Indicators:

- Appearing socially isolated
- Utilising extremist rhetoric
- Demonstrating extremist ideologies
- Alterations in level of participation
- Shifts in personal appearance (tattoos, clothing choices, etc.)
- Changes in conduct
- Alterations in social groups or associations

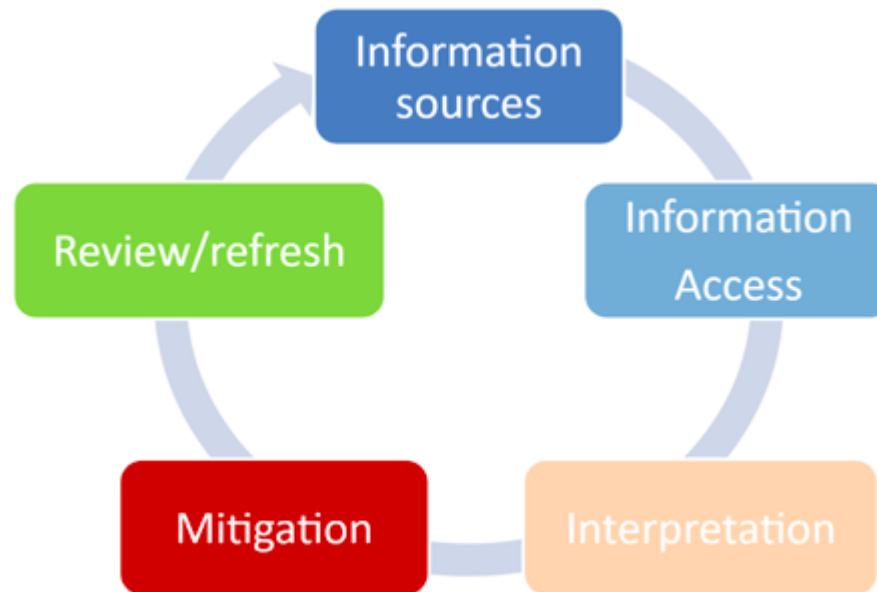
## Appendix 2: Disclosure Recording Form

<https://www.coventry.gov.uk/downloads/file/34070/prevent-referral-form>

## Prevent Duty: Risk Assessment & Action Plan

Our Risk Assessment aim is to assess where & how students might be at risk of being drawn into terrorism .... campus and student welfare, including equality and diversity and the safety and welfare of students and staff.... assess the physical management of the university estate” ([Paragraph 19, Prevent statutory guidance for higher education](#))

The Risk Assessment is a constant process, and will be on a cycle of the following stages:



N o.	<b>Prevent Vulnerability/Risk Area</b>	<b>Risk</b>	<b>Whose responsibility ?</b>	<b>What is already done/being done?</b>
1	<b>Leadership</b>	Are senior managers aware of and had training in their 'Prevent Duty' responsibilities?	Senior Management team	All Staff are up to date with their 'Prevent Duty' training, and are booked in on an annual basis as a minimum. Upcoming training is always scheduled.
2	<b>Internal &amp; External contacts</b>	Has an internal Prevent lead been appointed? Is the person known to all?	DSO	DSO contact details are on all material which relate to Safeguarding and Prevent, such as policies, in the apprentice handbook, and posters to be put in the centre.
3	<b>Training</b>	Do all staff /external associates have awareness of key Prevent points:  - what it is and its aim  - how to recognise vulnerable students who might be drawn to extremism  - know core British values  - be ready to exploit opportunities to promote them	Senior Management team and delivery staff	Prevent policy includes details about what The Marketing Trainer is aiming to do to implement the policy. As well as the training already being implemented and planned for the future, there are awareness sessions around the above in the apprentice induction which will include such things as how to spot signs of radicalisation and how to refer. There is also the opportunity to explore and discuss the British Values in the curriculum.  Regular staff training will be conducted by the Prevent Lead which will keep staff up-to-date with the latest developments both internally and externally.  The reporting procedure will be constantly evaluated to ensure it is as easy and effective as possible to report any Prevent concerns.

		<ul style="list-style-type: none"> <li>- be ready to use them to challenge extremist statements</li> <li>- know to report when they have concerns about anyone, and who to report to?</li> </ul>		
4	<b>Welfare support</b> Does the provider have sufficient welfare support, especially for vulnerable students?		DSO	The DSO is trained in how to give counselling, however if further support is required, The Marketing Trainer will fund any additional counselling/support sessions.

5	<p><b>Safeguarding</b> Does the provider have policies (or included in safeguarding policy) to protect its students from access to extremist materials, e.g.</p> <p>a) <b>Online safety</b> Reference to Prevent duty/filters to restrict extremist websites/info to and contract with staff &amp; students about not accessing extremist material on personal IT/response for failing to follow policy</p>		DSO	<p>The Marketing Trainer has a Safeguarding e-Safety Policy and IT Policy.</p> <p>The IT Policy lays out how The Marketing Trainer will restrict access to any prohibited material, which is constantly updated.</p>
7	<p><b>Policy(ies)</b> Are above points covered in Prevent policy included in existing safeguarding policy/separate policies/combination of these? Do policies include record keeping</p>		DSO	<p>Both the Safeguarding Policy and Prevent Policy refer to the referral process when a member of staff or student has a safeguarding/Prevent concern.</p>



	procedures (e.g. training/concerns/referrals to outside agencies?)			
8	<b>External speakers</b>	Is there a way to prevent any extremist material being spread to apprentices through external speakers?		External speakers are vetted several times before they will be allowed to speak at Game-On, this will include checking the speaker does not hold any views which discriminate against any religious views and beliefs. Content from the external speaker will also be checked before they are allowed to speak. This is included in the above External Speakers Policy.
9	<b>Emerging risks in the external environment</b>	New methods to radicalise	DSO	DSO will establish connections with local authorities/agencies in order to stay up-to-date with any emerging risks. DSO will then update policy, amend training to include how to minimise these new risks and straight away inform coaches/trainers to be vigilant

10	<b>Visitors to training venues</b>	Could pose potential threat to the welfare of apprentices/staff or possible data breaches	Senior Management Member at training venue	Any visitors to our office/training venues will not be able to proceed past reception. They will also be given a lanyard, and be with a staff member of The Marketing Trainer at all times
----	------------------------------------	---	--	--