



Established Independent Training Provider for Professionals

Safeguarding and Prevent Duty Policy

Version Control Statement

Section	Date	Author	Changes
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Safeguarding & Prevent Duty Policy

This policy is to help aid and provide staff in the implementation and support of Safeguarding & Prevent Duty.

The policy includes the following information –

- Introduction to Prevent
- Board of Directors and Management Responsibilities
- Prevent & British Values
- Possible Signs of abuse or radicalisation
- Codes of Conduct
- Referral Agencies & contacts – local and sub-regional
- Procedure flow charts – Channel / Safeguarding
- Incident & template form
- HM Government '7 golden rules to information sharing' guide

Introduction to Prevent.

The government's strategy for countering terrorism CONTEST strategy is split into 4 areas: Pursue, Protect, Prepare & Prevent. All FE institutions must comply with the Prevent Duty under the Counter Terrorism Act 2015.

The Prevent strategic objective is to stop people from becoming or supporting terrorists or radicalisation and challenge all forms of terrorism, including the influence from far-right extremist groups. The Prevent duty is to protect people from all streams of extremist activity and not solely aimed at one specific group.

The Prevent strategy has 3 key objectives and will specifically:

- 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 & support.
- Work with sectors and institutions where there is a risk of radicalisation which we need to address.

Within the Home Office Prevent Duty guidance document, it sets out very clear expectations and responsibilities of board members, leaders, managers, and staff. Some of these are detailed below –
"We expect active engagement from boards, managers, leaders & staff with other partners including the police and regional Prevent coordinators"

"We expect institutions to demonstrate that they undertake appropriate training & development for boards, leaders, managers & staff"

"Where Ofsted finds a publicly funded provider inadequate action will be taken. In the case of private training providers this is likely to result in their contract being terminated."

Prevent is part of safeguarding learners and all training providers have a duty to safeguard their learners from all aspects of abuse, exploitation, and radicalisation. Implementing the Prevent Duty can be a sensitive issue for some learners & communities, and it is important to reiterate this is not about spying on learners or staff or about stopping conversations on controversial or sensitive topics. The Prevent Duty is intended to safeguard providers, learners & staff from being exposed to exploitation or radicalisation and to support the discussion and understanding of complex and controversial issues.

Dentrain Professionals Ltd will provide all staff and delivery partners with the support they need to implement the Prevent Duty. This will include annual safeguarding & Prevent health checks & risk assessments, arranging training, awareness sessions for staff & management, developing teaching & support materials, sharing good practice from the sector, and ensuring communication is frequent and open. Dentrain Professionals Ltd do not hold events on Dentrain premises nor do they hold any Dentrain affiliated events off Dentrain premises.

The next section of this policy will give a more detailed breakdown of the responsibilities and requirements of Dentrain Professionals Ltd in relation to Prevent & Safeguarding.

Board of Directors responsibilities under the Prevent Duty –

- Actively engage with partners, including the police & Prevent coordinators.
- Undertake appropriate training and development in Prevent Duty.
- Nominate a Prevent board member who will oversee the duty and safeguarding.
- Exemplify British Values (see appendix 1 for definitions of these) in their conduct.
- Be aware that inspection of the Prevent Duty by Ofsted will be judged as part of safeguarding which is included in the leadership & management grade. Implementation and practice of the Prevent Duty will be a limiting grade for a provider.
- Set the providers strategy for Prevent.
- Ensure robust procedures are in place to ensure all staff are aware of the Prevent Duty.
- Must comply with the requirements of the Equalities Act 2010 in ensuring that their organisation challenges discrimination and expects learners to comply with this legislation also.
- Must ensure that providers challenge racism, islamophobia, tackle hate & prejudice-based bullying, harassment, and intimidation as part of their commitment to exemplification of British Values.
- Need to appreciate the sensitivity of the subject and the need to approach the issues carefully with all learners and communities.
- Responsible for ensuring that the Duty and its requirements are communicated to all levels of the organisation – management, teaching staff, support staff, volunteers, and learners.

Leaders and Managers also have responsibilities under the Prevent Duty.

They must ensure:

- They have active engagement with local partners & support groups and regular contact with Prevent Coordinators.
- Clear, visible policies and procedures for managing whistleblowing & complaints.
- Policies are in place for learners using IT equipment safely, legally, and securely.
- Prevent compliments the organisations safeguarding, and equality acts and covers welfare & safety of learners & staff.
- A risk assessment is carried out to address the organisations implementation of Prevent.
- Robust procedures for managing subcontractors and their awareness and implementation of Prevent.
- Appropriate training of all staff in Prevent – this is completed by all staff annually.
- Staff exemplify British Values in their management, teaching and through general behaviours in the organisation.
- That opportunities within curriculum are used to promote British Values to learners
- Robust procedures for sharing information internally and externally about vulnerable individuals.
- Have clear Prevent referral process with single point of contacts which are known to all staff and learners
- Pastoral care is at the heart of the provision and sufficient pastoral care is available to all learners who are vulnerable or being exploited.

Prevent & British Values

To comply with the Prevent Duty, providers are expected to exemplify British Values in their management, teaching practice & general behaviours. British Values are defined as –

- Rule of Law

- Individual Liberty
- Mutual respect & tolerance of those from other backgrounds, religions, beliefs,
- Democracy
- Compliance with the Equality Act & those protected by it

The protected characteristics in the Equality Act are –

- Age
- Gender reassignment
- Disability
- Marriage & civil partnership
- Pregnancy & maternity
- Race
- Religion or belief
- Sex
- Sexual orientation
- Tutors will be expected to understand & embed British Values into the apprenticeship delivery journey to ensure learners are aware of them, can evidence & exemplify them & understand what it means to be a successful learner & take part in life & Britain today.

Learners will also be required to understand how to keep themselves protected from risks associated with radicalisation, extremism, forms of abuse, grooming, bullying & staying safe online. 'Extremism' is defined in the 2011 Prevent Strategy as vocal or active opposition to fundamental British values, including democracy, the rule of law, individual liberty and mutual respect and tolerance of different faiths and beliefs.

We also include in our definition of extremism calls for the death of members of our armed forces, whether in this country or overseas. 'Interventions' are projects intended to divert people who are being drawn into terrorist activity.

Interventions can include mentoring, counselling, theological support, encouraging civic engagement, developing support networks (family and peer structures) or providing mainstream services (education, employment, health, finance, or housing).

'Non-violent extremism' is extremism, as defined above, which is not accompanied by violence.

'Prevention' in the context of this document means reducing or eliminating the risk of individuals becoming involved in terrorism. Prevent include but is not confined to the identification and referral of those at risk of being drawn into terrorism into appropriate interventions. These interventions aim to divert vulnerable people from radicalisation. 'Radicalisation' refers to the process by which a person comes to support terrorism and extremist ideologies associated with terrorist groups.

'Safeguarding' is the process of protecting vulnerable people, whether from crime, other forms of abuse or (in the context of this document) from being drawn into terrorist related activity.

The current UK definition of 'terrorism' is given in the Terrorism Act 2000 (TACT 2000). In summary this defines terrorism as an action that endangers or causes serious violence to a person/people; causes serious damage to property; or seriously interferes or disrupts an electronic system. The use or threat must be designed to influence the government or to intimidate the public and is made for the purpose of advancing a political, religious, or ideological cause. 'Terrorist-related offences' are

those (such as murder) which are not offences in terrorist legislation, but which are judged to be committed in relation to terrorism. 'Vulnerability' describes the condition of being capable of being injured; difficult to defend; open to moral or ideological attack. Within Prevent, the word describes factors and characteristics associated with being susceptible to radicalisation.

Training providers are also expected to work with employers to ensure learners are not exposed to risks associated with any of the above and adequate awareness of Prevent & British Values has taken place with workplace mentors, line managers or HR.

Tutors & training providers must have an open culture which allows freedom of speech and exploration of issues that affect learners locally, nationally & internationally. Providers are to operate a safe place for learners to communicate, but provide challenge where views or discussions become offensive, extreme, or upsetting to others.

There are signs to look out for when working with learners that may indicate abuse, although these signs may not directly indicate a safeguarding issue, it may help tutors or support staff identify differences in behaviours that may need some follow up action.

Physical Abuse –

- Unexplained injuries or burns (inc Self- Harming)
- Refusal to discuss injuries
- Improbable explanations to injuries
- Untreated injuries or lingering illnesses

Exploitation / Radicalisation –

- Unexplained absences from work or class
- Appearing with unexplained gifts or new possessions
- New friends that are older
- Mood swings or changes in emotional well being
- Drug or alcohol misuse
- Individual's views becoming increasingly extreme
- Becoming increasingly intolerant
- Expresses desire / intent to take part in extremist activity
- Downloading, researching, or viewing extremist propaganda
- Withdrawn & focused on only one ideology
- Changes in appearance, personality and becoming isolated from friends, family & local community (This needs to be addressed sensitively as it could have various explanations and could happen at various times during the year / religious celebrations)

Code of Conduct

Staff working with young people or vulnerable adults must follow the codes of conduct set out in this document and that in the Safeguarding Policy.

You must NOT:

- Panic, the process and procedures are in place to support and protect you and your learner(s)
- Make any unnecessary physical contact with a young person or vulnerable adult, however if physical contact is unavoidable e.g providing comfort at times of distress this should only take place with the consent of the learner.
- Take vulnerable adults or young people alone in a car
- Meet vulnerable adults outside the work / training environment
- Engage in sexual provocative conversations or activity
- Allow the use of inappropriate language to go unchallenged

- Do things of a personal nature that the learners can do themselves
- Make promises to keep any disclosure confidential from the relevant authorities
- Show favouritism to the vulnerable adult
- Lie or say that everything will be ok when you cannot promise that
- Criticise the abuser, especially if it is a parent / carer
- Press for answers the learner is unwilling to give

You MUST:

- Listen carefully to what is said
 - Take what is said seriously and accept what is told
- respect learner's rights to privacy and encourage them to feel comfortable enough to report attitudes or behaviours they do not like
- Act with discretion with regards to their personal situations and relationships.
 - Be aware of the procedures for reporting concerns or incidents and familiarise themselves with the contact details of the safeguarding leads and local authority contacts
 - Make your safeguarding leads aware of any inappropriate affection or attention from a learner to you
 - Report any concerns relating to the welfare of the learner to your safeguarding lead. Write down as soon as you can exactly what has been said – do not add in anything extra & use only the words used by the learner
 - Tell the learner you must pass the information on but only those who need to know and tell them who these people are
 - Inform your safeguarding lead as soon as possible

Challenging extremism

If students make comments which could be regarded as extremist staff should encourage the students:

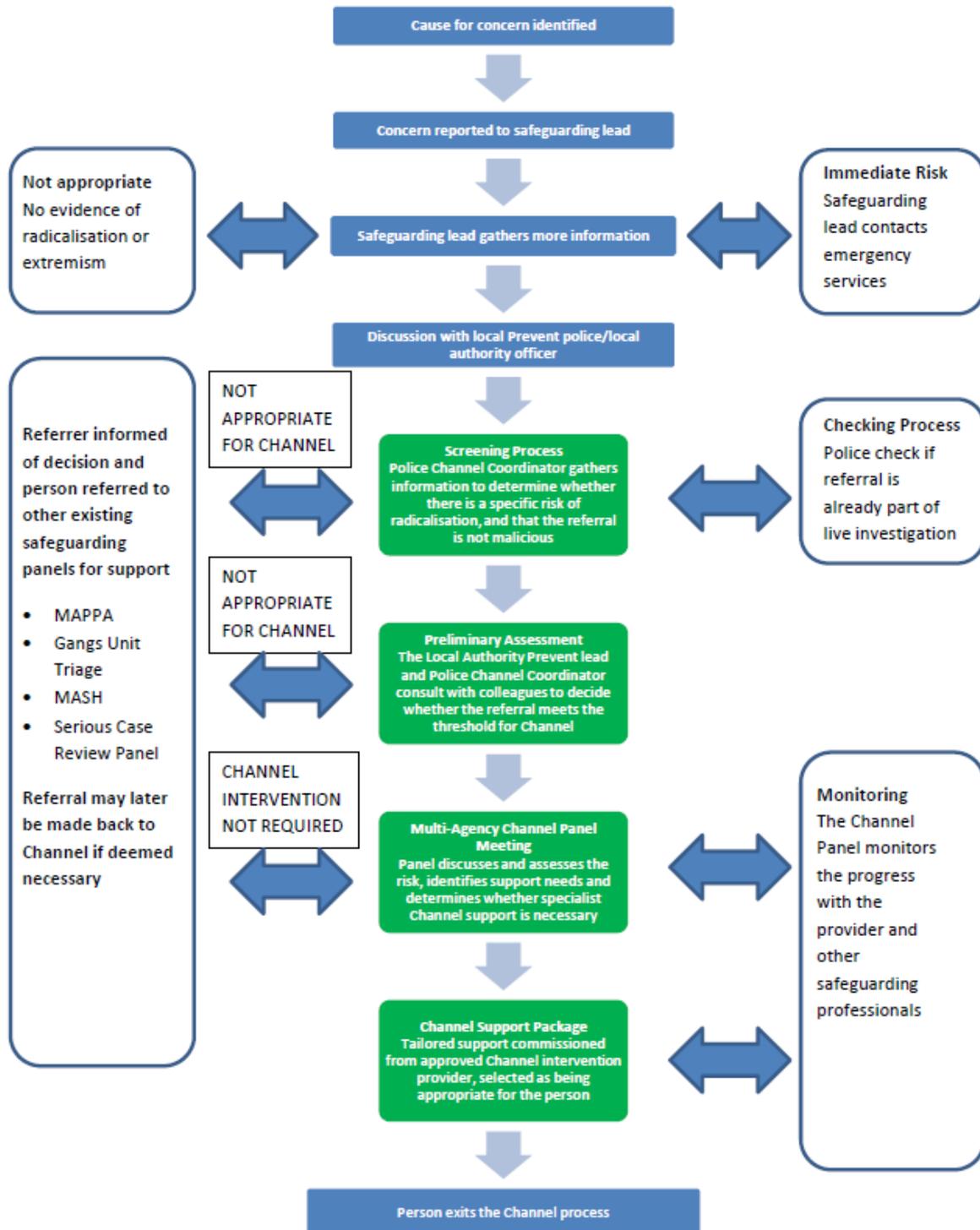
- to think critically
- to consider whether the evidence they have is accurate and full
- to consider whether they have received a partial and/or unsustainable interpretation of evidence.
- to consider alternative interpretations and views

Staff should use opportunities to challenge extremist narratives through discussion with students. If staff do not feel confident in challenging extremist ideas with their students, they should ask for support from the Safeguarding officer.

If students behave in a way which contravenes the equality and diversity aspects of the code of conduct which they have signed, then this is a disciplinary issue e.g., refusing to work with a gay student or a student of a different ethnicity. It should be dealt with through normal provider disciplinary processes.

Tutors & training providers must have an open culture which allows freedom of speech and exploration of issues that affect learners locally, nationally & internationally. Providers are to operate a safe place for learners to communicate, but provide challenge where views or discussions become offensive, extreme, or upsetting to others.

The Channel Process within FE Colleges



Prevent Incident Form

Please use this form to record an incident or concern of abuse, neglect or potential vulnerability of any learner. This includes any concerns for those learners who are /may be at risk of radicalisation or extremism. It is vital that Dentrain Professionals Ltd maintain records of any incidents and pass them to the required agencies.

Name & full contact details if possible.
Concern or Incident
Date, time & Location
Action Taken
Follow up

Name:

Signature:

Date:



HM Government **The seven golden rules to sharing information**

(Information sharing - Advice for practitioners providing safeguarding services to children, young people, parents and carers)

1. Remember that the Data Protection Act 1998 and human rights law are not barriers to justified information sharing but provide a framework to ensure that personal information about living individuals is shared appropriately.
2. Be open and honest with the individual (and/or their family where appropriate) from the outset about why, what, how and with whom information will, or could be shared, and seek their agreement, unless it is unsafe or inappropriate to do so.
3. Seek advice from other practitioners if you are in any doubt about sharing the information concerned, without disclosing the identity of the individual where possible.
4. Share with informed consent where appropriate and, where possible, respect the wishes of those who do not consent to share confidential information. You may still share information without consent if, in your judgement, there is good reason to do so, such as where safety may be at risk. You will need to base your judgement on the facts of the case. When you are sharing or requesting personal information from someone, be certain of the basis upon which you are doing so. Where you have consent, be mindful that an individual might not expect information to be shared.
5. Consider safety and well-being: Base your information sharing decisions on considerations of the safety and well-being of the individual and others who may be affected by their actions.
6. Necessary, proportionate, relevant, adequate, accurate, timely and secure: Ensure that the information you share is necessary for the purpose for which you are sharing it, is shared only with those individuals who need to have it, is accurate and up to date, is shared in a timely fashion, and is shared securely (see principles).
7. Keep a record of your decision and the reasons for it – whether it is to share information or not. If you decide to share, then record what you have shared, with whom and for what purpose.