

## TrainPlus Prevent Policy and Procedure

Lead Responsibility	Lisa Short	Approved by	Lisa Short
Version	V4 - 2024	Date of Approval	18/10/2024
Effective from	18/10/2024	Next review date	October 2025
<b>Policy applicable to</b>	<b>ALL EMPLOYEES and FREELANCE STAFF and LEARNERS</b>		
<b>Record of Changes:</b>	<ul style="list-style-type: none"> <li>• Section 4 updated – People responsible for Safeguarding and Prevent.</li> <li>• Section 5 updated – Reporting concerns</li> <li>• Appendix 2 updated – Prevent Referral Process Flowchart</li> <li>• Added Appendix 3 – Channel Referral Process Flowchart</li> </ul>		

## 1. Introduction

Section 26 of the Counter-Terrorism and Security Act 2015 imposes a duty on “specified authorities”, when exercising their functions, to have due regard to the need to prevent people from being drawn into terrorism. Further / Higher Education providers are “specified authorities”.

It is a condition of funding that all further / higher education and independent training providers must comply with relevant legislation and any statutory responsibilities associated with the delivery of education and safeguarding of learners.

*“The overall aim of the governments counter-terrorism strategy, CONTEST, is to reduce the risk from terrorism to the UK, its citizens and interests overseas, so that people can go about their lives freely and with confidence.*

*Prevent remains one of the key pillars of CONTEST, alongside the other three ‘P’ work strands:*

- *Prevent: to stop people becoming terrorists or supporting terrorism*
- *Pursue: to stop terrorist attacks*
- *Protect: to strengthen our protection against a terrorist attack*
- *Prepare: to mitigate the impact of a terrorist attack*

*The aim of Prevent is to stop people from becoming terrorists or supporting terrorism. Prevent also extends to supporting the rehabilitation and disengagement of those already involved in terrorism.*

*The Prevent duty requires specified authorities such as education, health, local authorities, police and criminal justice agencies (prisons and probation) to help prevent the risk of people becoming terrorists or supporting terrorism.*

*It sits alongside long-established safeguarding duties on professionals to protect people from a range of other harms, such as substance abuse, involvement in gangs, and physical and sexual exploitation.*

*The duty helps to ensure that people who are susceptible to radicalisation are supported as they would be under safeguarding processes.”*

## **2. Safeguarding and the Prevent Duty**

The document 'Keeping children safe in education' identifies radicalisation as a safeguarding concern. It is important that as part of Safeguarding, all learners, regardless of age are protected from radicalisation. TrainPlus recognises that members of staff and learners have a role to play in preventing radicalisation. All complaints, allegations or suspicions relating to radicalisation must be taken seriously and discussed with the Designated Safeguarding Lead.

## **3. Definition of radicalisation**

Radicalisation is the process where someone has their vulnerabilities or susceptibilities exploited towards crime or terrorism – most often by a third party, who have their own agenda. Concerns related to radicalisation where there are concerns that a learner is being radicalised or where there are concerns that a learner is expressing extremist views, then in line with the government Prevent Duty guidance, these concerns must be raised in the same way that any other safeguarding concern would be raised. The member of staff with the concern should discuss their concerns with the Designated Safeguarding Lead. If it is considered that the information given indicates that the learner may be at risk of radicalisation, they will make a referral in line with the Prevent Duty guidelines.

## **4. People responsible for Safeguarding and Prevent**

TrainPlus ensure that all staff have training that could help them prevent learners from being radicalised into terrorism.

TrainPlus expect appropriate members of staff to understand the factors that lead people to support terrorist ideologies or engage in terrorist-related activity.

TrainPlus has a responsibility to ensure staff have sufficient training to be able to recognise susceptibility to terrorism and be aware of what action to take in response, including TrainPlus' internal Prevent referral arrangements. This training is delivered upon induction of new staff and is redelivered on a yearly basis, to ensure staffs knowledge is current and are adequately equipped for their role.

Prevent's second objective is to intervene early to stop people from becoming terrorists or supporting terrorism. This means providing bespoke interventions for people who are susceptible to radicalisation.

The Designated Safeguarding Leads (DSL)/Prevent Leads in the setting receive more in-depth training, including on extremist and terrorist ideologies, how to make referrals and how to work with Channel panels. It is recommended that this training is updated at least every year, enabling the lead to support other staff on Prevent matters and update them on relevant issues. This could include the trends in the annually published Prevent referral statistics, relevant local or regional incidents, or new resources and training materials. For the settings where it applies, these requirements are consistent with those set out in 'Keeping children safe in education'.

## **5. Reporting concerns**

Where staff have concerns about a learner or learners who may be displaying or demonstrating behaviours which could be considered to be linked to radicalisation, then these concerns must be reported to the Designated Safeguarding/Prevent Lead or Deputy Designated Safeguarding/Prevent Lead as soon as possible and within 2 hours.

Signs that extremist views are being adopted, including changes in behaviour that might signal a concern, can be used to consider whether a referral should be made to seek support under Prevent. In determining whether a concern meets the threshold for referral to Prevent, it is important to consider the harm posed to the person, as well as whether accessing support through Prevent might stop potential wider societal harm committed by the person.

Be aware that your concern might not be welcome at first, and the person may get angry or defensive. You could try talking to other family and friends to see if they have noticed anything similar before getting expert advice.

### **Reporting Procedure:**

The names and contact details of managers and officers who have responsibility for safeguarding issues at TrainPlus are included in Appendix 1.

1. Discuss your concern with the Designated Safeguarding/Prevent Lead or Deputy Designated Safeguarding/Prevent Lead as soon as possible and within 2 hours.
2. Complete the TrainPlus Safeguarding form to record the information.

3. Where a student has been found to be at physical risk on TrainPlus premises or at their place of Employment (Apprenticeships), the Health and Safety Officer and Designated Safeguarding/Prevent Lead should be informed immediately, but in any event, within 2 hours.
4. If a student is in immediate danger or at risk of serious harm, for example in a life-threatening situation, call the emergency services by dialling 999 or the Essex Prevent Team 101. You must then communicate the information to the appropriate manager/s at TrainPlus (see appendix 1)
5. A flowchart describing this referral process is attached at Appendix 2.

**At no point should TrainPlus staff undertake any investigatory interviews.**

6. Written Records - The Designated Safeguarding Lead/Prevent Lead shall retain a copy of:
  - The completed TrainPlus Safeguarding form
  - The report to Essex Adult and Child Safeguarding Board  
<https://www.essex.gov.uk/report-abuse-or-neglect>
  - Any notes, memoranda or correspondence dealing with the matter
  - Any other relevant material

**The Designated Safeguarding Lead/Prevent lead should follow the Channel panel process when screening and gathering information. ([Section 5 of the Channel duty guidance: protecting people susceptible to radicalisation](#)).**

The Channel Panel Process stages include:

- Referral
- Screening and Initial Assessment
- Channel Panel Meeting
- Ongoing Support and Monitoring
- Case Closure
- Review and Evaluation

**Copies of reports, notes etc. should be kept securely locked at all times, and kept for a period of 7 years.**

## **6. Allegations about a Member of Staff**

The following procedures must be applied where allegations relating to a member of staff radicalising other individuals are received.

There are a number of sources from which a concern or an allegation might arise, including from:

- A young person or adult
- A parent / guardian / carer
- A member of the public
- A disciplinary investigation
- Another member of staff

**The person to whom an allegation or concern is reported must not question or investigate the matter further; they must:**

- Treat the matter seriously.
- Keep an open mind and avoid asking leading questions (use phrases such as “Tell me, Explain to me, Describe to me)
- Make a written record of the information as soon as possible (where possible in the individual’s own words), which should include:
  - the name of the complainant
  - when and where the alleged incident took place, including date and time
  - who was present
  - the account of what is alleged to have happened
  - your name, signature, and date
  - learner’s signature if appropriate

**The standard TrainPlus Safeguarding form should be used to record the information.**

**The Teacher Misconduct Referral form should be used to refer an allegation of serious misconduct by a teacher in England.**

- Contact the Designated Safeguarding Lead/Prevent Lead or Deputy Designated Safeguarding Lead as soon as possible and within 2 hours.
- If none of the above are available, contact TrainPlus Directors for further guidance.

### **Initial action by the Designated Safeguarding Lead**

The Designated Safeguarding Lead must report an allegation to the Prevent Team at Essex Police

If a concern or an allegation requiring immediate attention is received outside normal office hours the Designated Safeguarding Lead must consult immediately with the local Prevent Team.

### **Malicious Allegations**

Where it is subsequently found that an allegation was made with malice aforethought, the Directors will determine an appropriate course of action. This may include disciplinary action against the accuser, acceptance of a written apology (subject to agreement about future behaviour) or other such sanctions as are deemed appropriate.

Proportionate responses to perpetrators of false or unsubstantiated allegations:

- Despite the distress caused, learners who make false allegations may still be entitled to continue to receive full access to the curriculum
- Where remaining in the same organisation as the falsely accused member of staff would be prejudicial either to that member of staff or the learner, consideration should be given to supporting the learner to identify suitable education or training opportunities elsewhere
- Permanent exclusion should be considered only as a last resort

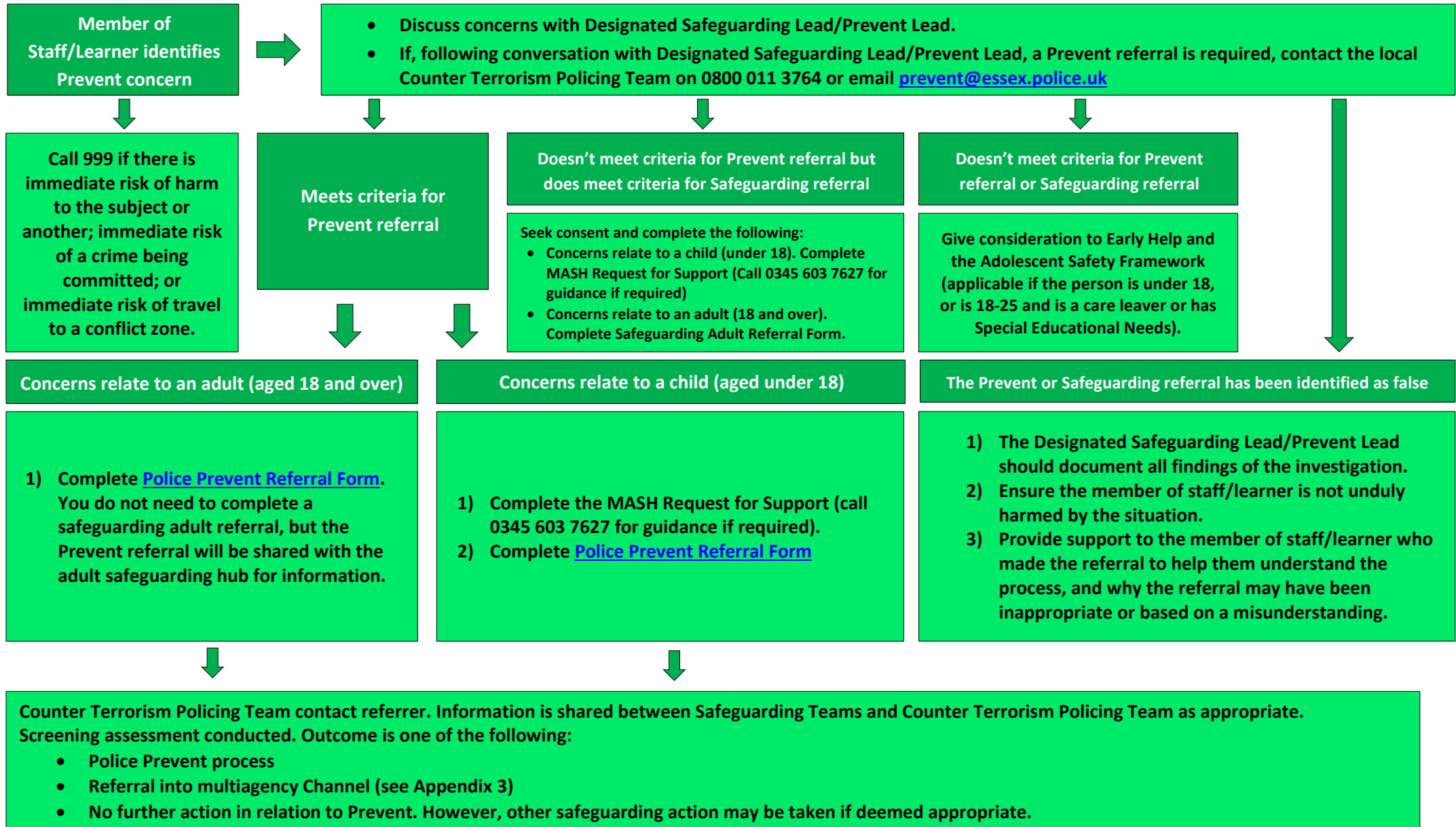
## Appendix 1

### Prevent Procedure - List of Useful Names and Contact Details

Name	Title	Organisation	Telephone Number/URL
Lisa Short	Designated Safeguarding Lead  Prevent Lead	TrainPlus Ltd	01268 574299 07904 410581
James Chance	Designated Deputy Safeguarding Lead  Deputy Prevent Lead	TrainPlus Ltd	01268 574299
Essex Prevent Team	Essex Prevent Team	Essex Police	101
ACT Early Support Line	Share a concern	Action Counters Terrorism	0800 011 3764
Essex Police Prevent Referral Form	Prevent Referral Form	Essex Police	<a href="https://www.essex.police.uk/advice/advice-and-information/t/prevent/prevent/alpha/prevent-referral/">https://www.essex.police.uk/advice/advice-and-information/t/prevent/prevent/alpha/prevent-referral/</a>



**Appendix 2 PREVENT REFERRAL PROCESS FLOWCHART**



### Appendix 3 CHANNEL REFERRAL PROCESS

Once a referral has been made and it meets the Channel criteria, the Police will carry out the below process with the support of multi-agency partners working to the relevant Local Authority Lead. This process takes place in order to identify the level of risk and provide an appropriate support plan where necessary.

