

PREVENT POLICY AND PROCEDURES

Policy Purpose/Commitment

To provide a policy and guidance to government prevent strategy and how Skills to Group have responded to its implementation. This policy sets out Skills to Group commitment and approach to comply with the Duty.

In complying with the Duty, Skills to Group demonstrate an understanding of its responsibilities under the Counter Terrorism and Security Act 2015 to prevent people of all ages being radicalised or drawn into terrorism, by protecting them from radicalising influences and seeks to meet its obligations in the ways set out within this policy.

Policy Scope/Promotion

This Policy applies to all aspects of Skills to Group work, onsite, remotely and across the online environment. As such the policy applies to everyone working for Skills to Group and all Apprentices/Learners, permanent and temporary staff, contractors, volunteers, self-employed staff and visitors/visiting speakers

What is Prevent?

The prevent strategy, published by the government in 2011 and the Prevent Duty Guidance 2023 is part of the overall counter- terrorism strategy, CONTEST. The aim of the Prevent strategy is to reduce the threat to the UK from terrorism by stopping people becoming terrorists or supporting terrorism. In the Act,this has simply been expressed as 'prevent people being drawn into terrorism'.

Contest is made up of four key programmes, each with a specific objective:

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

The Prevent strategy has three specific strategic objectives:

- Respond to 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.

Terrorist groups often draw on extremist ideology, developed by extremist Organisations. Some people who join terrorist groups have previously been members of Extremist organisations and have been radicalised by them. The government has defined extremism in the 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 our definition of extremism calls for death of members of our armed forces'.

Understanding Terminology and Definitions

Ideology: a set of beliefs

Radicalisation: the act or process of making a person more radical or favouring of extreme or fundamental changes in political, economic or social conditions, institutions or habits of mind

Safeguarding: the process of protecting vulnerable people, whether from crime, other forms of abuse or from being drawn into terrorism-related activity

Terrorism: an action that endangers or causes serious violence, damage or disruption and is intended to influence the government or intimidate the public and is made with the intention of advancing a political, religious or ideological cause

Vulnerability: describes the factors and characteristics associated with being susceptible to radicalisation

Extremism: is a vocal or active opposition to fundamental core British values, including democracy, the rule of law, individual liberty and mutual respect and tolerance of different faiths and beliefs. Calls for the death of the British Armed Forces is also included. Extremism can refer to a range of views e.g. racism, homophobia, some right-wing ideology, as well as any religious extremism.

Factors which Might Make Someone Vulnerable/Changes in Behaviour

The following factors might make individuals susceptible to exploitation. None of these are conclusive in themselves and therefore should not be considered in isolation but in conjunction with the particular circumstances and any other signs of radicalisation.

Isolation and Identity Crisis

Adolescents/vulnerable adults that are exploring issues of identity can feel distant from their parents/family and cultural or religious heritage, and uncomfortable with their place in society. Where there are feelings of isolation and loneliness, Radicalisers can exploit this by providing a sense of purpose or feelings of belonging. Where this occurs, it can often manifest itself in a change in a person's behaviour, their circle of friends, and the way in which they interact with others and spend their time.

Personal Crisis and Personal Circumstances

This may include significant tensions within the family that produce a sense of isolation of the vulnerable individual from the traditional certainties of family life. The experience of migration, local tensions or events affecting families in countries of origin may contribute to alienation from UK values and a decision to cause harm to symbols of the community or state.

Grievances

Examples of grievances which may play an important part in the early indoctrination of vulnerable individuals into the acceptance of a radical view and extremist ideology are:

- A misconception and/or rejection of UK foreign policy
- A distrust of western media reporting
- Perceptions that UK government policy is discriminatory (e.g. counter-terrorist legislation)
- Perception that their aspirations for career and lifestyle is undermined by limited employment prospects
- The world 'owes them a favour'.
- Other factors – similarly to the above the following have been found to contribute to vulnerable people joining certain groups supporting terrorist related activity:
- Ideology and politics and or youth rebellion
- Provocation and anger
- Need for protection
- Seeking excitement and action
- Fascination/morbid interest in violence, weapons and uniforms
- Seeking family and father substitutes
- Seeking friends and community, status and identity

Signs that May Cause Concern

- Apprentices/Learners talking about exposure to extremist materials or views outside the centre
- Changes in behaviour e.g. becoming isolated, being secretive
- Fall in standard of work, poor attendance, disengagement
- Changes in attitude, e.g. intolerant of differences/having a closed mind
- Asking questions about certain topics e.g. connected to extremism
- Offering opinions that appear to have come from extremist ideologies
- Attempts to impose own views/beliefs on others
- Using of extremist vocabulary to exclude others or incite violence
- Accessing extremist material online or via social network sites
- Overt new religious practices
- Apprentices/Learners voicing concerns about anyone.
- Changes in appearance

Ways to Counteract Risks

- Promote a safe and supportive environment via clear expectations of accepted behaviours and those, including radicalisation and extremism, that will not be tolerated which may include changes to Apprentice/Learners rules or staff code of conduct.
- Build on Apprentices/Learners/employees resilience of extreme narratives by exploring ways to encourage personal resilience and a positive identify. Helping to develop self-confidence, self-worth, ability to think critically amongst staff and Apprentices/Learners.
- Promote core British values through documents given to Apprentices/Learners, notices around the centre, via standalone classes on British culture and traditions on arrival, via the curriculum. Approach is to educate that this is how things are in UK, although it may be different in your/other countries.
- Where possible, develop critical awareness and thought to counter accepting extremism without question, especially of online material.

- Challenge radical and extremist views in any context via stated procedures. In most situations this would require an immediate response, relating to environment of the centre and tolerance expected, and then reporting concerns.
- Be ready to react when world or local events cause upset and the likelihood of conflicting feelings being expressed. Prevent Lead to take initiative in these situations.
- Have strong filters on IT equipment and clear rules on accessing extremist/terrorist websites, uses of social networks to exchange extremist/terrorist views.
- Ensure that extremist speakers do not use premises to distribute materials or expound views, have system for vetting any visiting speakers.
- Staff get to know Apprentices/Learners, their home circumstances, their friendship groups, making it easier to spot changes in behaviour.
- Staff to be observant and vigilant in noticing any signs of radical or extremist behaviour.
- Staff to work hard supporting any Apprentices/Learners identified as vulnerable.

Risk Assessment

Skills to Group will:

- Have clear policies in place covering staff, Apprentices/Learners, learning and infrastructure (use of premises) capable of identifying where Apprentices/Learners or staff may be at risk of being drawn into terrorism. These policies will help us satisfy ourselves that we are able to identify and support these individuals.
- Use the duty to complement the company's responsibility under the Equality Act 2010 and cover Apprentices/Learners welfare, including:
  - Equality and diversity
  - The safety of Apprentices/Learners
  - The safety of staff
- Ensure there is an awareness of the risks of being drawn into terrorism through Prevent awareness training.
- Undertake risk assessments to address the physical management of the estate, including policies and procedures for events held by staff, Apprentices/Learners or visitors and relationships with external bodies and community groups who may use premises and/or work in partnership with the institution.
- Have clear and visible policies and procedures for managing whistleblowing and complaints.
- Have procedures in place to assess partners' delivering courses to ensure this does not lead to inadvertently funding extremist organisations.
- If Skills to Group identify a risk we will consider notifying the Prevent Lead and others as necessary and develop a Prevent Action Plan.

Leadership

Skills to Group expect those in Leadership positions to:

- Establish or use existing mechanisms for understanding the risk of radicalisation
- Ensure staff understand the risk and build capabilities to deal with it
- Communicate and promote the importance of the duty
- Ensure staff implement the duty effectively

Responsibility for ensuring Prevent Duty is met lies with Safeguarding Team. Responsibility for Prevent Risk Assessment and Action Plan and policy lies with Safeguarding Lead and overseen by the Safeguarding Director.

Partnership

Prevent work depends on effective partnership. To demonstrate compliance with this duty, Skills to Group will demonstrate evidence of productive co-operation.

Skills to Group will make and maintain contact with local police/local authority Prevent Lead to understand their role and the support available, e.g. via the Channel process.

We will also make contact with local authority to ascertain other useful local agencies and develop local area Prevent links with other similar organisations. Finally, we will share information with all local organisations as appropriate.

Current Partnership links:

Tracey Naismith, Head of Community Safety, Plymouth City Council,
Ballard House, West Hoe Road, Plymouth PL1 3BJ
T 01752 304321
E Tracey.Naismith@plymouth.gov.uk
www.plymouth.gov.uk

Kirsty Passmore, Technical
Lead, Safer Communities,
Plymouth City Council
01752305465

Geoff Turner-Moore, Youth Intervention Officer, Devon and Cornwall Police
Geoffrey.TURNER-MOORE@devonandcornwallpolice
07934 419227

Steve Rowell, Preventing Extremism/Terrorism Lead, Cornwall
Steve.Rowell@cornwall.gov.uk
01736 336587

Sarah Jeffrey, Devon and Cornwall Police Chaplain
Sarah.Jeffrey@devonandcornwall.pnn.police.uk
07720 341614

Chaplains in the Plymouth Area:

Captain Andrew Richards, Salvation Army
Reverend Vanessa Appleton, Hooe Baptist Church

Sharing Information

The Prevent programme must not involve any covert activity against people or communities. Skills to Group may need to share personal information to ensure that a person at risk or radicalisation is given appropriate support; for example on the Channel Programme.

Information sharing must be assessed on a case-by-case basis and is governed by legislation. To ensure the rights of individuals are fully protected, it is important that information sharing agreements are in place at a local level. When considering sharing personal information, account should be taken of the following:

- Necessity and proportionality; personal information should only be shared where it is strictly necessary to the intended outcome and proportionate to it. Key to this will be the professional judgement of the risks to an individual or the public.
- Consent; wherever possible consent of the person concerned should be obtained before sharing any information about them.
- Power to share; the sharing of data by public sector bodies requires the existence of a power to do so, in addition to satisfying the requirements of the Data Protection Act 1998 and the Human Rights Act 1998.
- Data Protection Act and the Common Law Duty of Confidentiality; in engaging with non-public bodies, the specified authority should ensure they are aware of their own responsibilities under the Data Protection Act.

There may be circumstances where, in the course of Prevent related work, Skills to Group identify someone who may already be engaged in illegal terrorist-related activity. People suspected of being involved in such activity should be referred to the police.

Staff Training and Responsibilities

Skills to Group will ensure:

A single point of contact (SPOC) is identified who may have some specialist knowledge or experience who will understand the process and policies in place when vulnerability has been identified, know when to make referrals to the Channel Programme and where to get additional advice and support.

Skills to Group in showing compliance with the duty will demonstrate that it undertakes appropriate training and development for governors, leaders and staff. This will enable trainers/assessors/tutors and others supporting delivery of the curriculum to use opportunities in learning to educate and challenge.

It will also allow all staff to exemplify British values in their management, teaching and through general behaviours, including ensuring that opportunities in the curriculum are used to promote the British values to Apprentices/Learners.

Staff who engage with the public will understand what radicalisation means and why people may be vulnerable to it. They will be made aware of what we mean by the term ‘extremism’ and the relationship between extremism and terrorism.

We will ensure our staff have an understanding of the factors that make people vulnerable to being drawn into terrorism and to challenge extremist ideas which are used by terrorists groups and can purport to legitimise terrorism. Staff will have sufficient training to be able to recognise this vulnerability and be aware of what action to take in response.

Staff will know what measures are available to prevent people from becoming drawn into terrorism and how to challenge extremist ideology that can be associated with it. They will understand how to obtain support for people who may be being exploited by radicalising influences.

Skills to Group will ensure we provide appropriate training for staff involved in the implementation of this duty:

- Online training module through Education Training Foundation with a test and certificate at the appropriate level for the staff member's role and confirmation of viewing the Run, Hide and Tell video: Board, Directors, Managers, Practitioners, Support Staff.
- This training is Mandatory for all staff and is included as part of the recruitment and induction package for all new staff.
- This will be supported by regular in-house training by external persons to all Practitioners as Mandatory and optional attendance by other staff.
- On a regular basis, Prevent and British Values Awareness is delivered to Apprentices/Learners as part of their induction and staff are encouraged to attend.

Welfare and Pastoral Care

Skills to Group will provide our Apprentices/Learners with sufficient pastoral care and support, according to the needs of the particular individual. There is a dedicated Team to provide support, pastoral care and signposting on premises.

Speakers and Events

From time to time, we invite speakers from our wider community to give talks to enrich our Apprentices/Learners experiences at Skills to Group, providing them with information that helps them make decisions, widening their understanding of the world issues and providing motivation and inspiration through sharing of the speaker's experience.

Our responsibility to our Apprentices/Learners is to ensure they can critically assess the information they receive as to its value to themselves and that the information is aligned to the ethos and values of Skills to Group and British Values.

The Prevent strategy guidance requires Skills to Group to have clear protocols for ensuring that any visiting speakers, whether invited by staff or Apprentices/Learners, are suitable and appropriately supervised.
The protocols are:

- All visiting speakers to have a nominated point of contact at Skills to Group (the organiser).
- The organiser will be responsible for informing the SPOC (specific point of contact) and the SPOC will request the visiting speaker to complete the Visiting Speaker at Skills to Group Form. This asks them to outline the information they wish to communicate and to agree to the guidelines for visiting speakers attached to the form.
- Conducting research on the person/organisation to establish whether they have demonstrated extreme views/actions
- Refusal to allow people/organisations to use Skills to Group premises if they have links to extreme groups or movements. Justification of Skills to Group's decision will be provided to the person/organisation in writing.
- Conducting a risk assessment in relation to the Prevent Duty

- Maintaining and formal register of all visiting speakers
- Visitors to provide photo ID upon arrival at Skills to Group
- Ensuring visiting speakers are accompanied at all times and are not left unsupervised with Apprentices/Learners at any point.

Freedom of Speech

Skills to Group have an important role to play as a place of debate and discussion where ideas can be tested without fear of control, where Apprentices/Learners learn to challenge ideas and think for themselves.

The role of Skills to Group in ensuring free speech is reinforced in two pieces of legislation:

A) The 1986 Education Act states that 'persons concerned in the government of any establishment shall take such steps as are reasonably practicable to ensure that freedom of speech within the law, members, students and employees of the establishment and for visiting speakers.

Skills to Group, will not, therefore, deny access, as far is as reasonably practicable, to its premises to individuals or bodies on the basis of their beliefs, views or policies.

B) The Equality Act 2010 covers the following protected characteristics: age, disability, gender, gender reassignment, marriage and civil partnership, pregnancy and maternity, race, religion or belief and sexual orientation.

Skills to Group has due regard to the need to:
- Eliminate discrimination, harassment and victimisation and any other conduct that is prohibited under the Act
- Advance equality of opportunity between people who share a relevant protected characteristic and people who do not share it.
- Foster good relations between people who share a relevant protected characteristic, and those who do not share it.

Code of Practice

This Code of Practice applies to all staff, Apprentices/Learners, Directors and visiting speakers and all Skills to Group premises.

Skills to Group expects Apprentices/Learners, staff and visitors to ensure freedom ofspeech within the law is assured. Whilst there is no legal prohibition on offending others, Skills toGroup believes that discussion that is open and honest can take place only if offensive or provocative action and language is avoided. Therefore all stakeholders are required to demonstrate sensitivity to the diversity of Skills to Group community and to show others respect.

An event which creates an environment of fear, harassment, intimidation, verbal abuse or violence, particularly as a result of age, disability, gender, gender reassignment, marriage and civil partnership, pregnancy or maternity, race, religion of belief and sexual orientation is likely to be unlawful.

- If Apprentices/Learners, staff believe that an event they are organising poses a risk under this code, they are required to refer the matter in the first instance tothe Safeguarding Team. No advertising of the event is permitted until a decision is reached on its compliance with the Code of Practice.
- The Safeguarding Lead will make an initial assessment. If he/she decides the event complies with the Code of Practice it can go ahead. They may, however, require the organisers to put in safeguards, such as a strong, well informed person with the power to intervene or close the event down if there is a breach of the Code.
- A named Principle Organiser should be identified for each event who is responsible for the booking and control arrangements and conduct of the events including stewarding, monitoring and entry.
- The expression of views that may be controversial, but do not breach the law, will not constitute reasonable grounds for refusal. Reasonable grounds for refusal would include: incitement to commit a criminal act, unlawful expression of views, support for an organisation whose aims are illegal, and the creation of an environment likely to give rise to a breach of the peace.
- Wilful breach of this Code will be dealt with under Skills to Group's disciplinary procedures and, if necessary, by resource to law.
- Skills to Group will withhold the right to use its premises if it fears there is a likelihood of this Code being breached.

If a staff member is planning to run an event and are concerned it may constitute a breach of the Code of Practice, they should contact a member of the Safeguarding Team.

Safety Online

Skills to Group has a Policy relating to the use of IT which contains specific reference and inclusion of Prevent Duty.

The Policy details filtering/firewall systems to prevent staff, Apprentices/Learners and visitors from accessing extremist websites and materials and includes the use of their own devices via Wi-Fi.

A CEOPS Internet Safety Course is delivered regularly to Apprentices/Learners as part of their induction and encourages all staff to attend on a regular basis.

Premises Security

Arrangements are in place to manage access to the premises by visitors/Apprentices/Learners/non-Apprentices/Learners and staff. This includes clearly signposted entrances and exits and manned Receptions. Staff and visitors are required to sign in and visitors are provided with numbered ID Badges. Staff have Skills to Group ID Badges and the wearing of these is regularly reinforced and enforced. Under the Health, Safety and Safeguarding Policy, the storing,transport, handling and audit of dangerous substances is covered.

Safeguarding

Protection against risk of radicalisation and extremism is included within the Health, Safety and Safeguarding Policy. This includes referral to Channel.

Safeguarding staff and teams are regularly updated and refreshed on safeguarding legislation, policies and procedures including recent and ongoing training to enable effective understanding and handling of referrals relating to radicalisation and extremism.

Communication

The Safeguarding Team and SPOC is communicated across the organisation through Induction, Apprentice (Learner) Handbooks, OneFile notifications and Signposted Posters.

Staff are made aware of the Prevent Duty from new staff within their Induction and regular staff meetings.

Individual and group training has been promoted and regular sessions are available for staff to attend along with Mandatory sessions and the online module Mandatory for all staff at all levels.

Staff know their responsibilities for identifying Apprentices/Learners and risks and reporting to the SPOC or if unavailable, another member of the Safeguarding Team.

Incident Management

The SPOC being the most suitable and trained person to lead on incidents, has a critical incident management plan, capable of dealing with terrorist related issues in place. The SPOC has used this to inform the Communications/Media sections of the nature of such incidents and how to respond. This includes tensions on or off premises which might impact upon staff, Apprentices/Learners and/or public safety.

How to Know What to Do and When to React to Concerns

Everyone will be provided with a name of who to contact, (SPOC) contact details and how to contact them and told to report any concern or incident, however small.

Confidentiality will be assured for the person reporting a concern and reassurance that reported concerns will be dealt with sensitively and carefully.

Supporting Documents

The following links to source documents are useful;

- Children Act 1989
  https://www.legislation.gov.uk/ukpga/1989/41/contents

- Adoption and Children Act 2002
  https://www.legislation.gov.uk/ukpga/2002/38/contents

- Every Child Matters 2003 (Green Paper)
  https://www.gov.uk/government/publications/every-child-matters

- Children Act 2004
  https://www.legislation.gov.uk/ukpga/2004/31/contents

- Children and Social Work Act 2017
  https://www.legislation.gov.uk/ukpga/2017/16/contents/enacted

- Working Together to Safeguard Children DfE 2018
  https://www.gov.uk/government/publications/working-together-to-safeguard-children--2

- Keeping Children Safe in Education DfE 2024
  https://www.gov.uk/government/publications/keeping-children-safe-in-education--2

- Care Act 2014
  https://www.legislation.gov.uk/ukpga/2014/23/contents/enacted

- Care and Support Statutory Guidance
  https://www.gov.uk/government/publications/care-act-statutory-guidance/care-and-support-statutory-guidance

- Information Sharing Advice for Safeguarding Practitioners
  https://www.gov.uk/government/publications/safeguarding-practitioners-information-sharing-advice

- The Plymouth Assessment Framework for Safeguarding Young People and their Families including the inert-agency Thresholds Protocol for support and Intervention 2016
  https://www.plymouthscb.co.uk/building-supportKey Contacts and Signposting

- Designated Lead Safeguarding Officer (DLSO)
  Name: Annette Davey
  Phone: 01752 332410
  Email: safeguarding@skillsgroupuk.com or adavey@skillsgroupuk.com

- Health and Safety Officer
  Name: Stephen Jeffery
  Phone: 01752 332442
  Email: sjeffery@skillsgroupuk.com

- Plymouth Safeguarding
  Children Board Phone:
  01752 668000
  Email: PSCB@Plymouth.gov.uk

- Devon Safeguarding Board Multi-Agency Safeguarding Hub (MASH)
  Phone: 0345 155 1071
  Email: mashsecure@devon.gov.uk

- Torbay Safeguarding Children
  Board Phone: 01803 208100/ 01803 207176
  Email: mash@torbay.gov.uk/tscp@torbay.gov.uk

- Cornwall Safeguarding Children Board Multi-Agency Referral Unit
  (MARU) Phone: 0300 1231 116
  Email: multiagencyreferralunit@cornwall.gov.uk

Other agencies available for advice/guidance:

- Child Exploitation and Online Protection
  Website: www.ceop.police.uk
- Channel Referral Process
  https://www.plymouth.gov.uk/sites/default/files/ReferralProcessMap.pdf
- NSPCC Helpline
  Phone: 0808 800 5000

Document Control

This policy will be reviewed annually or earlier if deemed necessary

Date Last Reviewed: July 2025

Date to be Reviewed: July 2026

Authorised By

Signed 

Mark Boulting
Managing Director