



# Prevent Policy

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## Policy Statement:

Prevent is a fundamental aspect of safeguarding and is one of the four elements of the UK's Counter Terrorism Strategy (CONTEST)

The Counter Terrorism Strategy (CONTEST) aims to reduce the risk posed by terrorism, the 4 Ps of CONTEST which underpin the strategy are:

- 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

*CONTEST Strategy 2018*

The Prevent Duty is focussed on the element of prevention and has 3 clear aims, which are:

- 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 and support
- Work with sectors and institutions where there are risks of radicalisation that we need to address.

*Revised Prevent Duty Guidance England & Wales, updated April 2021*

Total People/MOL have a legal responsibility to fulfil the Prevent duty and are committed to creating and maintaining a safeguarding culture. This policy details how Total People 'have due regard, in the exercise of its functions, to the need to Prevent people from being drawn into terrorism'. *Counter Terrorism & Security Bill* This Prevent policy must be read alongside Total People's Safeguarding Policy.

## Key Terms:

- Extremism: is the vocal or active opposition to our fundamental values, including democracy, the rule of law, individual liberty and the mutual respect and tolerance of different faiths and beliefs. This also includes calling for the death of members of the armed forces
- Radicalisation: refers to the process by which a person comes to support terrorism and extremist ideologies associated with terrorist groups
- Terrorism: is 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

*Keeping Children Safe 2022*

## Scope:

This policy relates to all potential and actual apprentices, trainees, learners, colleagues, volunteers, subcontractors and partners at Total People/MOL.

This policy relates to all forms of terrorism including non-violent extremism. Examples of terrorism include right wing extremists, animal rights, ecoterrorism, cyber terrorism, international terrorism, INCEL (involuntary celibates) movement.

## Legislation:

- Counter Terrorism & Security Act 2015
- The Equality Act 2010
- [The United Kingdom's Strategy for Countering Terrorism \(June 2018\) CONTEST 3](#)
- [Prevent Duty](#)
- [Prevent Duty Guidance for Further Education in England & Wales, updates April 2021](#)
- Keeping Children Safe in Education 2022

## Requirements of Prevent

The Prevent duty requires further education providers to:

- Work in partnership with and actively engage with external partners, including community organisations, local support agencies, the police and Channel.
- Make sure colleagues have undertaken appropriate training and share information across curriculum areas.
- Have clear and visible policies for colleagues and apprentices/learners regarding risk assessment, including policies for events that may take place by colleagues, learners, visitors, external bodies and community organisations.
- Have an awareness of places or areas of learning where apprentices/learners / colleagues may be in contact with, or possibly get involved with, terrorism.
- Have sufficient support available for welfare and pastoral care according to the individual's requirements. Including guidance and policies on the use of prayer rooms or other faith related facilities and issues that may occur from the use of these facilities.
- Educating learners appropriately in relation to British Values and life in Modern Britain.

## Our Objectives:

- To ensure safety of all apprentices/learners, potential apprentices/learners, colleagues and visitors.
- To protect apprentices/learners and employees from radicalising influences.
- To promote Total People's mission, vision and values.
- To promote and embed British Values into policies, procedures and throughout the apprentices/learner's curriculum.
- To create a Prevent risk assessment and action plan which is regularly reviewed, updated and [evaluated](#) to ensure our duties under PREVENT are met.
- To ensure all apprentices/learners, colleagues and subcontractors are aware of their responsibilities in preventing violent extremism and radicalisation.
- To ensure that Total People promotes a culture of non-bullying, non-harassment and non-discrimination.
- To provide support for apprentices/ learners and potential apprentices/learners who might be at risk or vulnerable to risk by following Total People's safeguarding procedures, including the Channel referral process.
- To promote the Run, Hide, Tell campaign to all apprentices/learners, visitors & subcontractors.

<https://www.met.police.uk/SysSiteAssets/media/downloads/central/advice/terrorism/run-hide-tell-information-leaflet.pdf>

## British Values:

All colleagues at Total People will exemplify British Values throughout their interactions, behaviour and professional practice.

Total People understand the requirement to embed British Values into and throughout the apprentices/learner's curriculum. Curriculums across all delivery areas will embed appropriate opportunities throughout the apprentices/learners learning journey with Total People. Session plans / evaluations and progress reflections with apprentices/learners will detail how British Values have been embedded into practice.

The British Values are:

- Democracy
- The rule of law
- Individual liberty
- Mutual respect
- Tolerance of those with different faiths and beliefs

Additional enhancement courses that are developed centrally will be shared as appropriate with apprentices/learners across all curriculum areas to support knowledge and understanding of British Values.

## Roles & Responsibilities:

For a detailed overview of roles and responsibilities please refer to Total People's Safeguarding policy.

The Board at Total People have ultimate responsibility for Safeguarding & Prevent.

The Managing Director is responsible for leading on Total People's Safeguarding and Prevent policy and strategy which the Deputy MD and Senior Leadership Team (SLT) are responsible for embedding.

The Teaching & Learning Manager (curriculum) and Safeguarding Team are responsible for implementing Total People's Safeguarding and Prevent policy and making sure that concerns are shared with the relevant external organisations / agencies, in order to minimise the risk of apprentices/learners and colleagues becoming involved in terrorism.

### **All colleagues are responsible for:**

- Attending all mandatory safeguarding and Prevent training and keeping up to date with current policy and procedures.
- Understand what may contribute to increased vulnerability in relation to radicalisation and extremism.
- To understand the signs and indicators that may cause concern.
- To remain observant and vigilant to identify concerns.
- To share concerns following Total People's Safeguarding procedures. Internal reporting procedures for learners for all colleagues = CPOMS. Where concerns / incidents relate to potential learners, visitors, subcontractors then these are reported using the report a concern webform.

**In addition, all delivery colleagues are responsible for:**

- Planning appropriate opportunities throughout the apprentices/learner's curriculum, with employer involvement (where possible / relevant) to fully embed British Values and prepare learners for life in Modern Britain.
- To develop apprentices/learners understanding of terrorism and extremism, to support apprentices/learners to protect themselves and others, and to have the confidence and resilience to be able to share their concerns.
- To develop learners' knowledge of and ability to critically think which supports learners to keep themselves safe and report concerns.
- To provide opportunities for learners to develop emotional intelligence which supports learners to keep themselves safe and report concerns.
- Be able to confidently challenge extremist ideology in a way which supports apprentices/learner's education.
- Use opportunities throughout the curriculum and progress reviews that enable learners to recall what they have learnt in relation to Prevent and British Values.
- Check employer's awareness of Total People procedures in relation to Prevent and safeguarding.

**Employers:**

- To understand their responsibilities in relation to Prevent.
- Take part in apprentices/learner / employer induction.
- Read Total People's published policies and guidance including (to be checked by the LC at the 6-week review).
  - Prevent
  - Safeguarding
  - Equality Diversity & Inclusion
  - Health & Safety
  - Employer guide to safeguarding
- Actively engage in regular tri-party reviews with apprentices/learners and their Learning Coach.
- Report any concerns they have following Total People procedures. (Note: Weblink or Safeguarding email address for employers to report directly. If employers report directly to TPL/MOL colleagues this must be recorded without delay via CPOMS/webform).

**Subcontractors are responsible for:**

- Full compliance with Total People's due diligence process.
- Full compliance with Total People's policies in relation to safeguarding and Prevent.
- Following Total People safeguarding reporting procedures

**Training to implement the Policy:**

**Colleagues:**

Mandatory training to implement this policy is provided for all Total People/MOL colleagues this is reviewed and updated annually, this includes several annual Virtual College modules, all of which are approved CPD courses.

- Virtual College module - Equality, Diversity and Inclusion
- Virtual College module - Understanding Pathways to Extremism and the Prevent Programme
- Virtual College module - Level 1 Safeguarding Children

**Prevent Policy**

- Virtual College module - Safer Recruitment
- LTE Group I Learn - Acceptable Use Policy
- Total People annual Keeping Children Safe in Education Update / training
- ETF training - Safeguarding in FE
- ETF training - Prevent (course determined by job role. Prevent for Board Members, Prevent for Leadership and Management, Prevent for Practitioners, Prevent for Support Staff and Prevent for Subcontractors).

In addition to this CPD style activities and examples of good practice are shared through the monthly DDSL/DSP/ managers safeguarding meetings and weekly email communications and cascaded into Cluster meetings.

A Total People Safeguarding/Prevent newsletter is issued monthly covering key topics and updates for all colleagues and can be used to promote discussions with apprentices/learners and employers.

An all colleagues call is held virtually, every week and chaired by the Deputy MD. These calls provide monthly opportunities to cover key safeguarding/Prevent updates and spotlight topics.

### **Subcontractors:**

Total People require subcontractors to provide effective safeguarding and Prevent training and on-going CPD for all their employees, Total People monitor through due diligence and regular monitoring activity. In addition to this Total People require any subcontractors and relevant employees to complete the following ETF training modules.

- Safeguarding in FE – all staff
- Safer Recruitment – anyone with a responsibility for recruitment
- Prevent – course to be determined by role – Prevent for Subcontractors and Prevent for Practitioners.

### **Promoting and gaining Commitment to the Policy:**

Total People will ensure that this Prevent Policy is promoted, and commitment gained via the following activities. This is not an exhaustive list, as other mechanisms will be used as and when the situation arises.

This policy will be agreed by the Total People board of governors with promotion and commitment to this policy gained through:

- Staff induction/Training/CPD/Online learning modules
- Intranet/Hub section on safeguarding and Prevent, and what it means for staff and apprentices/learners
- Visible media in and around office and employer locations
- Learning resources for all apprentices and other learners
- Email headers and footers
- Apprentice/learner reviews – carried out on an 8-weekly basis.

We will ensure that we gain and measure the promotion and commitment within Total People to this Prevent Policy by:

- Monitoring the outcomes from online and interactive training for both staff and apprentices/learners
- Ensuring updates to are effectively communicated to colleagues, learners and employers

### **Prevent Policy**

- Managers will produce evidence (e.g. meeting notes) staff training and 1-2-1 reviews, that this policy has been discussed
- Monitoring of learner review documentation
- Monitoring specific responses to safeguarding and prevent in learner and employer surveys
- Through learner voice activities and focus groups
- Through our use of internal quality checks and reviews and through audits checks.

### **Apprentices/Learners:**

Safeguarding and Prevent awareness training including Equality, Diversity and Inclusion and British Values are covered at apprentices/learner induction.

During induction Total People's reporting procedures are explained to apprentices/learners so they can raise a concern about themselves or someone else.

Regular 8 weekly Progress Reviews are carried out, these are tri-party reviews between the apprentices/learner, Total People Learning Coach and the employer. Progress Reviews are used to raise awareness of Prevent, EDI and Safeguarding topics and to contextualise to the apprentices/learner's workplace and experiences.

In addition to embedded activities throughout the apprentices/learner's curriculum there are centralised enhancement courses that are provided. Enhancement courses cover a wide range of subjects designed to enhance personal development and maximise opportunities to reflect on current news stories and events. Examples of courses include:

- Civil Rights
- Democracy and Elections
- Pride Month
- Online Security and Risks
- LGBTQ+ PRIDE

### **Vulnerabilities, Signs and Indicators**

Throughout colleague training such as Virtual College CPD accredited courses, ETF training modules and on-going updates through forums such as the Total People newsletter. All Total People colleagues are trained to understand factors that may make an individual vulnerable and the signs and indicators to look for that may be a cause for concern. This training covers examples such as ...

#### **Vulnerabilities:**

It is important that all colleagues recognise factors that may contribute to someone becoming more vulnerable to radicalisation and extremism. Examples of some of these vulnerabilities include:

- Period of transition
- Social isolation
- Age / naivety
- Addiction
- Poor education
- Mental Health issues
- Developmental disorder
- Economically disadvantaged

Understanding the factors that may push someone or pull someone towards radicalisation is important, but so too is understanding that these factors can be part of anyone's daily life and do not mean someone is at risk.

**Pull factors to be aware of:**

- Ideological attraction
- Sense of belonging
- Charismatic recruiters
- Adventure
- Romance
- Excitement
- Liking violence
- Rebellion
- Ego
- Sense of mission

**Push factors:**

- Racism
- Poverty
- Alienation
- Humiliation
- Sense of belonging
- Sense of mission
- Charismatic recruiters
- Trauma
- Injustice
- Ideological attraction

**Possible signs & indicators:**

- Depressed / withdrawn / isolated
- Feeling under threat
- Being influenced or controlled by a group
- Desire for political or moral change
- Need for identity, sense of meaning / belonging
- Mental Health issues
- A desire for status / a need to dominate others and control
- Change of appearance
- Feelings of injustice

These are possible signs to consider, it is not an exhaustive list and people may reflect many of or all these signs but not be at risk.

**Referral process:**

All Total People colleagues, employers and subcontractors have a duty of care to share their concerns.

Anyone can raise an apprentice/learner concern – a Total People member of staff, an employer, a parent, the apprentice/ learner – for themselves or someone else.



## CPOMS

All Total People learners (live on PICS) are on CPOMS and for these learners' colleagues report incidents / information / concerns directly via CPOMS. (All colleagues are trained to report via CPOMS).

For more information, our CPOMS our process and guides can be found on the Hub. See links below.

[TPL018- CPOMS-Student Import Process-Total People](#)

[TPL030-CPOMS-Logging in to Total People CPOMS](#)

[TPL031 -CPOMS-Adding an incident responding to actions](#)

For any external reports or where a learner is not yet on CPOMS (prior to enrolment & MOL initial concerns) incidents / information / concerns will be submitted via our concern record on the Total People website.

Visit the **Total People website**, click **About** and select **Safeguarding** then select **Report a Concern**:

<https://www.totalpeople.co.uk/about/safeguarding/report-a-concern/>

If a concern is raised to a Total People member of staff and the concern indicates at risk of immediate harm. Then action must be taken immediately, and a member of the safeguarding team contacted (see key safeguarding contacts) **The Safeguarding concern record must be completed as soon as it is safe to do so.**

The Designated Safeguarding Lead will be responsible for ensuring all relevant external agencies have been contacted. A referral for a high-risk concern will be made on the same day.

Where a concern is raised about an apprentice/learner and the apprentice/learner is identified as not being at immediate risk then a Safeguarding concern record should be completed **as soon as possible (as soon as is safe to do so).**

There must be no delay in relation to the completion and submission of a Safeguarding concern record by a member of Total People.

Total People's safeguarding policy and procedure for reporting concerns will be shared with apprentices/learners and employers as part of induction and throughout their programme.

## Criminal convictions:

Learners are asked for a criminal record disclosure (disclosure of any unspent criminal convictions) as part of the enrolment process at Total People. The start is only processed by Learner Records if the Safeguarding team confirm there is a current risk assessment completed.

Where an unspent criminal conviction has been disclosed a risk assessment will be completed. This will be completed by the relevant sector with support as required from the Safeguarding team. A copy of the risk assessment and any associated actions will be held on the learners CPOMS record.

Risk assessments are used to ensure any potential risks are mitigated for the safety, well-being and inclusivity of all learners, including the learner with the unspent conviction.

The collection and storage of this sensitive information is covered by an LTE Data Protection Impact Assessment (led by DPOs and including all relevant people across relevant business units).

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## Concerns about staff or employers:

Where a concern is about a Total People colleague (including any low level concerns / relevant information) then this will be reported to our HR manager Rachel White using the Total People HR email [HR@totalpeople.co.uk](mailto:HR@totalpeople.co.uk) The Total People HR Manager will link in with the relevant member of the Safeguarding Team as required.

If the concern was relating to HR then this would be reported directly to the Deputy MD [GSteele@totalpeople.co.uk](mailto:GSteele@totalpeople.co.uk).

## External Speakers & Events:

External speakers and events at Total People/MOL are subject to a risk assessment before they can be approved and will not go ahead if any risk cannot be mitigated. Information sharing on a need to-know basis with other institutions and education providers will take place if appropriate and legal under GDPR. The risk assessment is completed by the person / people arranging the event and must be approved by Total People's Safeguarding Team before the visit / speaker can be confirmed. The [LTE group External Speaker, Organisation, Event and Literature Policy](#) must be followed by all Total People/MOL colleagues. This must also be shared with the relevant external speaker/organisation / guest. The LTE group risk level matrix (LTE group policy appendix 2) and external speaker checklist (appendix 1) will be completed by the relevant manager, approved by the DSL and held centrally.

## Links to policies:

- Total People's Safeguarding and Child Protection (includes digital safety)
- Total People's Equality Diversity and Inclusion Policy
- LTE Health and Safety Policy
- Total People's Health and Safety policy
- LTE Acceptable Use Policy (internal only)
- LTE Data Protection Policy
- [LTE group External Speaker, Organisation, Event and Literature Policy](#)

## Channel and Escalation:

Where the safeguarding procedure has been followed and needs escalating further, then this could possibly result in Total People contacting the local Counter Terrorism Unit or Channel. Channel provides a multi-agency approach to early support. Through Channel individuals at risk are identified, the risk assessed, and a plan of support developed. Consent is not required to make a referral to Channel but consent from the individual is required to be able to provide and implement a support plan. Total People/MOL will not hesitate to make a Channel referral where it is deemed appropriate and will work with all agencies involved to implement the support plan.

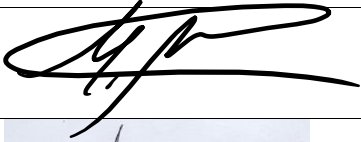

## Continuous Improvement

Please refer to the Total People Safeguarding Policy. In addition to this Total People's Prevent Risk Assessment contributes to the on-going evaluation and improvement of practice.

## Signatures & Review:

This Policy will be published on Total People's internal Hub, the Total People website and links made in the colleague induction e-booklet, as well as the commitment statement that is completed with employers at the start of programme.

This policy will be updated annually as a minimum.

	Name	Position	Signature
<b>Approver:</b>	Melanie Nicholson	Managing Director Total People	
<b>Board Approver:</b>	Barry Lynch	Board Chair Total People	
<b>Version:</b>	Version 3.1		