

Prevent Duty

Policy and Procedure

Lomax Training Services Limited
PREVENT Duty for Staff Policy and Procedure
(Equality and Diversity Assessment)

We will consider any request for this procedure to be made available in an alternative format.

We review our policies and procedures regularly to update them and to ensure that they are accessible and fair to all. All policies and procedures are subject to equality impact assessments. Equality Impact Assessments are carried out to see whether the policy has, or is likely to have, a different impact on grounds of age, disability, gender reassignment, marriage and civil partnership, pregnancy and maternity, race, religion or belief, sex, sexual orientation or human rights.

We are always keen to hear from anyone who wants to contribute to these impact assessments, and we welcome suggestions for improving the accessibility or fairness of the policy.

To make suggestions or to seek further information please contact:
Colin Arkley on Tel: 0191 262 3040

If any employee has difficulty understanding this policy or needs assistance completing any documentation associated with the policy, please contact Colin Arkley

1. Introduction
2. Background and legal Position
3. CHANNEL
4. Roles and Responsibilities
5. Prevent Training
6. Prevent in the Curriculum
7. Fundamental British Values
8. Visiting Trainers/Guest Speakers
9. Reporting Process
10. Associated Policies and Procedures
11. Procedure Review

Annex A Visitor/Guest Speaker Approval e-mail (template)

Annex B Freedom of Expression – Code of Practice

Annex C Glossary of Terms

- 1. Introduction

Lomax Training Services Limited recognises that we have an obligation to ensure that we create a safe learning environment for staff, students and visitors alike. Under the Government's PREVENT Duty ("the duty") we have obligations to ensure that we protect our staff, students and visitors from harm, by challenging extremist and radical views and ensuring staff and students are adequately trained to refer students who may be susceptible to such extremist views. This policy has been developed to detail these obligations and aid their dissemination and support of the Government's PREVENT agenda.

The Policy seeks to reduce the risk from terrorism, so that everyone can go about his or her lives freely and with confidence by highlighting:

- Strategies to prevent people from being drawn into terrorism and hateful extremism
- Support the work to strengthen our protection against a terrorist attack and mitigate the impact of such an act.

- 2. Background & Legal Position

The specific legislation in relation to PREVENT is set out within Section 26 (1) of the Counterterrorism and Security Act 2015 ("the Act") and revised guidance of April 2019 and imposes a duty on "specified authorities" (as a provider of Further/ Higher Education this duty extends to the College), when exercising their functions to have due regard to the need to prevent people from being drawn into terrorism.

The PREVENT duty forms part of the Government's overall approach to countering terrorism and preventing people from becoming terrorists or supporting violent and hateful extremism. PREVENT is a key part of CONTEST, the United Kingdom's Strategy for Countering Terrorism. PREVENT is part of the existing business safeguarding framework.

The duty places mandatory duties and responsibilities on a range of public organisations, including training providers, and seek to:

- Respond to the ideological challenge of terrorism and aspects of extremism, and the threat we face from those who promote these views
- Provide practical help to prevent people from being drawn into terrorism and violent extremism and ensure they are given appropriate advice and support

- Work with a wide range of sectors where there are risks of radicalisation which needs to be addressed, including education, criminal justice, faith, the internet and health.

There are five clear strands of the duty which are detailed as:

- Challenging the violent extremist ideology and supporting mainstream voices
- Disrupting those who promote violent extremism and supporting institutions where they may be active;
- Supporting individuals who are being targeted and recruited to the cause of violent extremism;
- Increasing the resilience of communities to violent extremism;
- Addressing grievances, both genuine and perceived, that ideologies are exploiting.

Lomax Training Services Limited will educate staff that encouragement of terrorism and inviting support for a proscribed terrorist organisation are both criminal offences.

- 3. CHANNEL

CHANNEL is a key part of the duty and is a programme which focuses on providing support at an early stage to people who are identified as being vulnerable to being drawn into terrorism. The programme uses a multi-agency approach to protect vulnerable people by:

- Identifying individuals at risk
- Assessing the nature and extent of that risk
- Developing the most appropriate support plan for the individuals concerned

Lomax Training Services Limited ensures staff receive appropriate training and understand the role of CHANNEL. However, any concerns relating to PREVENT should initially be reported to the Designated Safeguarding Officers.

4. Roles and Responsibilities

All staff at Lomax Training Services Limited have a responsibility for the successful implementation of this policy and associated processes, however this policy recognises that a number of individuals/groups have additional responsibilities to

ensure the effective development, promotion, implementation and monitoring the adherence and observation of the principles of this policy

Lomax Managers will:

- Ensure that all Staff within their area of responsibility have undertaken training in the PREVENT Duty;
- Reflect the policy's principles and approaches within their own management
- Ensure staff within their area of responsibility are provided with appropriate advice and guidance in referring concerns about learners or fellow colleagues to the Designated Safeguarding Officer

Lomax's PREVENT Co-ordinator will:

- Ensure that the Lomax's PREVENT Strategy is implemented across the business and liaise with partner organisations to ensure appropriate mechanisms are in place to support/minimise the risk of learners/staff becoming involved in terrorist or extremist activity.
- The Lomax's PREVENT Co-ordinator will work closely with our Designated Safeguarding Leads and is responsible for deciding on the most appropriate form of action to take to support the individual(s) concerned and/or to make a referral through CHANNEL.

All Staff will:

- Create and support an ethos that upholds the business mission, vision and values including Fundamental British Value , to create an environment of respect, equality, diversity and inclusion;
- Attend appropriate Safeguarding and PREVENT updates/training including the exemplifying and promoting of Fundamental British Values in order to have the skills to recognise those who may be vulnerable to radicalisation, involved in violent or non-violent extremism, and to know the appropriate action to take if they have concerns;
- Report any concerns around extremism or radicalisation via the appropriate safeguarding reporting channels;
- Newly appointed staff will complete mandatory online PREVENT and Safeguarding training, and will answer questions regarding the PREVENT duty as part of the recruitment process.

All Learners will:

- Contribute to an ethos that upholds the business mission, vision and values including Fundamental British Values, to create an environment of respect, equality and diversity and inclusion;

- Show respect to Lomax staff, fellow learners, visitors, business property and the business environment;
- Attend and engage in all teaching, learning and assessment strategies and curriculum opportunities that promote Prevent and Fundamental British Values;
- Fully engage in opportunities to feedback on Prevent and Fundamental British Values;
- Report any concerns around extremism or radicalisation via the appropriate safeguarding channels.

5. PREVENT Training

Lomax Training Services Limited will ensure appropriate training is made available to all staff. The training will seek to ensure that staff understand the factors that make people vulnerable to being drawn into terrorism; to challenge extremist ideas which are being used by terrorist groups and provide an understanding of the CHANNEL programme.

Prior to having any provisional offer of employment confirmed, any potential appointee (including supply pool staff) will be required to complete a suite of mandatory on-line training packages. This training seeks to inform everyone of the key obligations underpinning their role within the business environment and covers topics that include:

- Safeguarding
- CHANNEL and PREVENT
- Equality and Diversity
- Safer Recruitment.

This training will be supplemented with face-to-face training that will be appropriate to the role of the member of staff.

The suite of PREVENT training includes online and face to face training and it is covered in depth at Staff Induction. It provides guidance on how to identify people who may be vulnerable to radicalisation and how to refer them into the CHANNEL programme.

Staff with sufficient training will be able to recognise vulnerability (Radicalisation) and be aware of the action to take. They will understand when to make referrals to the CHANNEL programme and the business process for reporting and where to get additional advice and support.

The promotion of Fundamental British Values as well as Freedom of Expression is firmly embedded into PREVENT training. The training packages continue to be developed to ensure that the information is up to date and relevant.

All learners undergo a comprehensive Induction at Lomax and their chosen programme.

- 6. PREVENT in the Curriculum

Lomax Training Services Limited will provide a curriculum that engages learners in learning activities and other opportunities that raise their knowledge and understanding of PREVENT, Radicalisation and the promotion of Fundamental British Values so that learners engage in these subjects to develop a deeper understanding about what they mean to them now and for their future; preparing students for future life and employability in modern Britain.

Teaching and Learning will provide a curriculum that promotes Fundamental British Values, knowledge, skills and understanding, to build the resilience of students by undermining extremist ideology and supporting the student voice. This will be achieved through:

- Embedding Fundamental British Values, equality, diversity and inclusion, wellbeing and community cohesion throughout the curriculum;
- Promoting wider skills development such as social and emotional aspects of learning
- A curriculum adapted to recognise local needs, challenge extremist narratives, and promote universal rights
- Teaching, learning and assessment strategies that explore controversial issues in a way that promotes critical analysis and pro-social values
- Encouraging active citizenship and learner voice.

The Lomax curriculum areas will provide opportunities for students to explore Prevent through curriculum-based activities, e.g. tutorial, awareness sessions. These will be developed within curriculum areas so that recognise the diverse sectors which they cover as well as provision for a whole business approach in terms of a celebration of respect and tolerance. These activities will be planned across the academic year through the Curriculum.

Ensuring that all learners feel safe is a priority to everyone at Lomax Training Services limited. This is complemented by a range of posters displayed. The development of key values and the development of all learners into well rounded citizens is paramount to prepare all learners for life and work in Britain's multicultural society.

The business will focus on the impact that all activities have on the learners and specifically their understanding of PREVENT, Radicalisation and Fundamental British Values.

The business will utilise robust survey data that will allow for comparisons over time as well as sector benchmarking. A set of key objectives will be developed and used to monitor impact and inform further interventions where required. These will be monitored in line with the Risk Assessment and Action Plan.

- 7. Fundamental British Values

As part of the duty Lomax has a responsibility to ensure the promotion of Fundamental British Values to all staff and learners. To this end it is mandatory as part of the recruitment process of all staff that they demonstrate the Fundamental British Values of:

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

Staff have a duty to promote and embed Fundamental British Values into teaching, learning and assessment and support learners to understand the connection with PREVENT and Radicalisation.

8. Visiting Guest Speakers

Any meeting or activity that is external to the business activities and is to be held or to take place on premises managed by Lomax will be dealt with in accordance with the business guest speaker Policy.

Where the event is delivering a guest speaker session to Lomax learners, prior approval must be sought from the Managing Director using the approval email template, provided at Annex A. The nature/content of the session and the individual(s) delivering the session must be specifically detailed by the 'organising individual', so they are provided with the pertinent information to be about to make a sound judgement.

Approval needs to be sought via the approval email method, at least two weeks in advance of the session taking place.

If approval is not sought, then the 'organising individual' may be subject to Disciplinary proceedings for failure to follow the specified process.

Arrangements are deemed to be provisional until permission has been granted by the Managing Director.

Where an event is risk assessed and deemed that it would breach the PREVENT duty if it were to go ahead, this information may be shared with other institutions (e.g. the Police).

Where a session/visit is approved and the content being delivered breaches the terms of the duty, it will be stopped immediately.

Reporting Process

Any concerns should be reported immediately to the PREVENT Single Point of Contact (SPC).

The PREVENT SPC will then determine any further required action/ referral is required.

Records of risk assessments, alerts and reports will be maintained for inspection purposes.

10. Associated Policies and Procedures

The following represents the main policies and procedures that may be used to deal with and support issues in relation to our obligations/responsibilities under the duty. Thus, it is important that this policy is read in conjunction with the following:

Recruitment and Selection Procedure

- Safeguarding Policies
- Staff Disciplinary Procedure
- Equality & Diversity
- PREVENT Strategy

11. Procedure Review

The effectiveness of this Procedure will be monitored annually and reviewed every five years in light of experience, guidance from the Department for Education, changes in legislation and best practice. This mechanism recognises that changes to employment legislation may prompt a review of the Procedure before the five years stipulated.

In considering the effectiveness of this Procedure, consultation will be undertaken with staff and managers to assist in the review and monitoring of this Procedure.

Annex A

Visitor / Guest Speaker Approval Email (template)

Dear (Managing Director)

I wish to seek approval for (insert name of individual) to be present within the Lomax Training Services Limited to undertake a guest speaker session. The pertinent information regarding the session/activity is detailed below:

Name:

Company Name (if applicable):

Date of event (including times of session):

Organising Individual:

Paid / Unpaid:

If paid, is it via the business payroll or will we paying a company to provide a service:
Agreed rate of pay for visit (if paid):

Nature of activity (please provide details of the content of the session):

I confirm that the nature/duration of this session(s) as detailed above is being undertaken in accordance with the business PREVENT and Safeguarding obligations.

I can confirm that as this work is to be paid, I attach a copy of the Paid Visitors Form and confirm that all relevant ID has/will be presented to the finance department in advance of the session taking place. I am aware that if sufficient and relevant ID is not presented to the finance department, then the session will be cancelled and (insert name of the individual) will not be paid. [delete if unpaid]

I can confirm that (insert name of individual) will be always supervised whilst on the companies premises by myself or (insert name of alternative staff member).

I can confirm that I am aware of the business obligations in terms of the PREVENT duty and will immediately cease any session where the content being delivered breaches this duty. I have assessed the purpose/content* in relation to this visit/arrangement* (*delete as necessary) and have determined this to be low risk with regards to the PREVENT duty.

I confirm that should approval be granted; it is based on the above information being detailed as accurate. Should any of the information change in advance of the session taking place I am aware that a new request will need to be made.

Furthermore, I understand that if I wish to utilise this individual on a more regular basis to undertake paid work, (insert name of individual) will need to register with the company.

I confirm I have passed all relevant Covid information to the visitor/guest. This includes information about the new site layout, social distancing whilst onsite, do not attend the business if you are displaying any of the recognised symptoms, hygiene arrangements and the mandatory need to wear face masks in classrooms/workshops and communal areas (e.g. corridors, stairways, malls, reception areas, library, shop, toilets).

Should you require any further information please do not hesitate to contact me Kind regards
(Name of organising individual)

Annex B

Freedom of Expression – Code of Practice

Lomax Training Services Limited has an obligation to issue and keep up to date a code of practice to be followed by staff, and visitors to the business for the organisation of meetings and other events taking place on the business premises.

Statement of Intent

Freedom of expression is an important feature for the business as an open institution, where the freedom to express ideas and opinions is a fundamental principle. However, all such freedoms are subject to limitations under the law, to protect the rights and freedoms of others. The Lomax acknowledges it clearly needs to balance its legal duties in terms of both ensuring freedom of speech and protecting student and staff welfare.

Lomax Training Services Limited believes that all those who come into contact with young people and/or adults at risk in their everyday work have, and must discharge, a duty to safeguard and promote their welfare. The business seeks to achieve this by:

- a. not suppressing freedom to express controversial or unpopular views, provided that the expression of those views does not carry the attendant risk (whether or not intentional) of the encouragement of terrorism and inviting support for a proscribed terrorist organisation, incitement to riot, racial hatred, religious hatred, sexual harassment or other activities which are likely to be unlawful;
- b. upholding the principles of freedom to express potentially controversial or unpopular views;
- c. not permitting the business premises or resources where the views being expressed, or may be likely to be expressed, constitute extremist views which risk drawing people into terrorism, or may be shared by terrorist groups;
- d. ensuring compliance by groups or individuals having their obligations under this, and related, policies;
- e. evaluating the implementation, monitoring and evaluation of this, and related, policies.

Annex C

Glossary of Terms PREVENT Duty Policy and Procedure

Adult - People aged 18 years or over.

Breaches – The breaking, violation or infringement of a promise or obligation (including Contractual. Other examples include a breach of trust, breach of confidentiality).

CHANNEL - A key part of the PREVENT duty, which focuses on providing support at an early stage to people who are identified as being vulnerable to being drawn into terrorism.

CONTEST – The UK's strategy for countering terrorism. Corporation: Extremism – The holding of extreme political or religious views.

Ideology – A set of opinions or beliefs of a group or an individual, often political or cultural.

Organising Individual – A member of Lomax who is arranging for a Guest Speaker or other visitor to attend the business event or session.

PREVENT - Falling within the business safeguarding framework, The PREVENT duty forms the Government's approach to countering terrorism and preventing people from becoming terrorists or supporting violent extremism. PREVENT is a key part of CONTEST.

Radicalisation – A process by which an individual or group comes to adopt increasingly extreme political, social, or religious ideals and aspirations that (1) reject or undermine the status quo or (2) reject and/or undermine contemporary ideas and expressions of freedom of choice.

Safeguarding - Protecting children, young people and vulnerable adults from physical, emotional or sexual abuse and neglect.

Terrorism – the unofficial or unauthorised use of violence and intimidation in the pursuit of political aims.

Young Person - A term used to define 'children' of a training age who are under the age of 18.