



Prevent Policy and Implementation Plan

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Overview

Prevent

The statutory guidance on the Prevent duty summarises the requirements in terms of four general themes: risk assessment, working in partnership, staff training and IT policies.

An aspect of safeguarding is the PREVENT duty, which requires the Education sector to have "due regard to the need to prevent people from being drawn into terrorism", supporting terrorism or being drawn into non-violent extremism.

The Prevent strategy has three specific objectives: respond to the ideological challenge of terrorism and the threat we face from those who promote it and to prevent people from being drawn into terrorism and ensure they are given appropriate advice and support.

Counterterrorism and Security Act

Sect 26 CTS Act places a duty on certain bodies (specified authorities – listed in Schedule 6) to have "due regard to the need to prevent people from being drawn into terrorism".

Guidance is issued under Section 29 of the Act:

- 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

Policy Scope

This policy should be read in conjunction with PAL's Safeguarding Policy, IT policy, Training and Development policy and Risk and Incident Management Policy.

This policy should be read in the context that as an EPAO PAL whilst working with education providers, does not have the same level of contact, or relationships with learners. PAL believes it is important our personnel understand the principles of PREVENT and the need to collaborate with partners, to protect anyone from radicalisation.

Who is this Policy for?

This policy is for all PAL employed and engaged personnel and PAL. This policy is shared on PAL's website and PAL expects all stakeholders to be aware of PREVENT; in the case of Training Providers and Colleges, PAL would expect such organisations to have a dedicated PREVENT policy and implementation plan.

Purpose

Prevent aims to safeguard vulnerable individuals (both adults and children) who may be at risk of potentially becoming involved in terrorist activities or being radicalised. It also aims to support institutions, such as schools, colleges, universities, or communities and groups where this may happen.

All PAL personnel, which includes associates, consultants/technical advisors and the advisory group have a responsibility to report any instances where they think they have identified a Safeguarding issue in relation to Prevent to one of PAL's Safeguarding Officers. (Designated Safeguarding Person- Managing Director; Deputy Safeguarding Persons- Business Operations Director). Additionally, for PREVENT, notification can be made to the Director of Audit and Compliance.

Responsibilities

All PAL personnel, to include associates dealing with apprentices have a legal responsibility under the Prevent Duty to make sure that:

They have undertaken training in Prevent Duty.

- They are aware of when it is appropriate to refer concerns to PAL's Safeguarding Officers who are the Managing Director and the Business Operations Director.

- They exemplify British values of "democracy, the rule of law, individual liberty and mutual respect and tolerance for those with different faiths and beliefs" into their practice.

Prevent Strategy Implementation

The government published the 'Prevent' strategy in 2011 as part of its overall counter-terrorism strategy, CONTEST. 'Prevent' duty guidance, first published in February 2015 was put into place in the further education and skills sector on the 18th of September 2015. As a result, all further education, and skills providers and EPAOs in England must have 'due regard' to the need to 'Prevent' people from being drawn into terrorism and also requires challenge to extremist ideas where they are used to legitimise terrorism.

The Prevent duty guidance for England and Wales (2023) - this is statutory guidance for specified authorities in England and Wales, issued on 7 September 2023 under Section 29 of the Counter Terrorism and Security Act 2015. Subject to Parliamentary approval, it comes into force on 31 December 2023. This guidance replaces the 'Revised Prevent duty guidance: for England and Wales', the 'Prevent duty guidance: for further education institutions in England and Wales', and the 'Prevent duty guidance: for higher education institutions in England and Wales' of 2015 (updated in April 2021).

The Prevent duty does not confer new functions on any specified authority. The term 'due regard' as used in the CTSA 2015 means that the authorities should place an appropriate amount of weight on the need to prevent people from becoming terrorists or supporting terrorism when they consider all the other factors relevant to how they carry out their usual functions. The purpose of this guidance is to set out the expectations for each of the main statutory sectors and describe the ways in which they should comply with the Prevent duty.

The latest guidance in the context of education expects the following:

- Compliance with the Prevent duty will reflect existing good practice on safeguarding. For example, it will ensure susceptibility to radicalisation is incorporated into safeguarding training, policies, and risk assessments. It is not anticipated that compliance will result in additional burdens on settings.
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See Appendix one for PAL's Prevent implementation plan- it should be noted as an EPAO, the contact PAL personnel have with learners is limited and as apprentices are registered with Colleges and /or Training Providers they will be covered by their training provider/college provisions.

The PAL Board takes on additional responsibilities for Prevent and its members act as the point of contact for any PREVENT reporting to recognised authorities and agencies who support the PREVENT and CHANNEL agenda.

The PAL Board and the Advisory Group will look to embed Fundamental British values within PAL and instil such principles and associated protocols in all of the business's dealings with stakeholders.

All personnel have access to training and briefings to understand factors which make apprentices, colleagues, or any other stakeholders, e.g., employers vulnerable to extremist ideas and know what action they should take

Improvement Target

Safeguarding Training to include reference to PREVENT; Equality and Diversity; Intention and Impact and Anti-Slavery. The EPA Managers and Quality Manager have the responsibility to organise and arrange such training and include it as part of PAL's company training offer. Resources to be made available via PAL's CPD Padlet, via e-learning modules from agencies such as ETF and through direct training.

Monitoring arrangements

Prevent will be a standing item under Health and Safety at Directors meetings and PAL will make use of the Advisory Group's expertise in this area to support policy development.

Information updates to be provided via the Professional Assessment Padlet and email and in specific cases through dedicated briefings and webinars

CONTEST

CONTEST is the Government's Counter Terrorism Strategy, published in July 2006 and refreshed in March 2009. The aim of the strategy is 'to reduce the risk from international terrorism, so that people can go about their lives freely and with confidence.'

CONTEST has four strands, often known as the four Ps. The aims of the 4 Ps are:

1. **PREVENT** - to stop people becoming terrorists or supporting violent extremism
2. **PURSUE** - to stop terrorist attacks through disruption, investigation, and detection
3. **PREPARE** - where an attack cannot be stopped, to mitigate its impact
4. **PROTECT** - to strengthen against terrorist attack, including borders, utilities, transport infrastructure and crowded places.

What is Extremism?

The Government has defined extremism 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". This also includes calls for the death of members of the British armed forces.

What is radicalisation?

People can be drawn into violence, or they can be exposed to the messages of extremist groups by many means. The risk of radicalisation is the product of a number of factors and identifying this risk requires that PAL personnel and representatives exercise their professional judgement, seeking further advice as necessary. It may be combined with other vulnerabilities or may be the only risk identified.

Potential indicators of radicalisation include:

- Use of inappropriate language.
- Change in language or behaviour.
- Change in social groups and friends and associates.
- Possession of violent extremist literature.
- Behavioural changes, this can include change to personal presentation, clothes.
- The expression of extremist views or expressing sympathy with extremist views.
- Advocating violent actions and means.
- Association with known extremists.
- Seeking to recruit others to an extremist ideology.

As with any form of grooming, people can be targeted and the process of radicalisation can take place over a period of time, although there is research that suggests the process of radicalisation in some instances, is rapid.

The Government has defined extremism as "vocal or active opposition to fundamental British Values", which include:

- Individual liberty
- Rule of law
- Democracy
- Mutual respect and tolerance of different faiths and beliefs

This includes not discriminating against those with protected characteristics (Equality Act 2010), namely:

- Age
- Disability
- Gender reassignment
- Marriage and civil partnership
- Pregnancy and maternity
- Race
- Religion and belief
- Sex and
- Sexual orientation

What is Channel?

Channel is an early intervention multi-agency process designed to safeguard vulnerable, susceptible people from being drawn into violent extremist or terrorist behaviour. Channel works in a similar way to existing safeguarding partnerships aimed at protecting vulnerable people.

Who does Channel work with?

Channel is designed to work with individuals of any age who are at risk of being exploited by extremist or terrorist ideologues. The process is shaped around the circumstances of each person and can provide support for any form of radicalisation or personal vulnerabilities.

How does Channel work?

Each Channel Panel is chaired by a local authority and brings together a range of multi-agency partners to collectively assess the risk and can decide whether a support package is needed. The group may include statutory and non-statutory partners, as well as lead safeguarding professionals.

If the group feels the person would be suitable for Channel, it will look to develop a package of support that is bespoke to the person. The partnership approach ensures those with specific knowledge and expertise around the vulnerabilities of those at risk are able to work together to provide the best support.

What does Channel support look like?

Channel interventions are delivered through local partners and specialist agencies. The support may focus on a person's vulnerabilities and personal risk around health, education, employment, or housing, as well as specialist mentoring or faith guidance and broader diversionary activities such as sport. Each support package is tailored to the person and their particular circumstances.

How will the person be involved in this process?

A person will always be informed first if it's felt that they would benefit from Channel support. The process is voluntary, and their consent would be needed before taking part in the process. This process is managed carefully by the Channel Panel.

Who can make a referral?

Anyone can make a referral. Referrals come from a wide range of partners including education, health, and youth offending teams, police, and social services.

What happens with the referral?

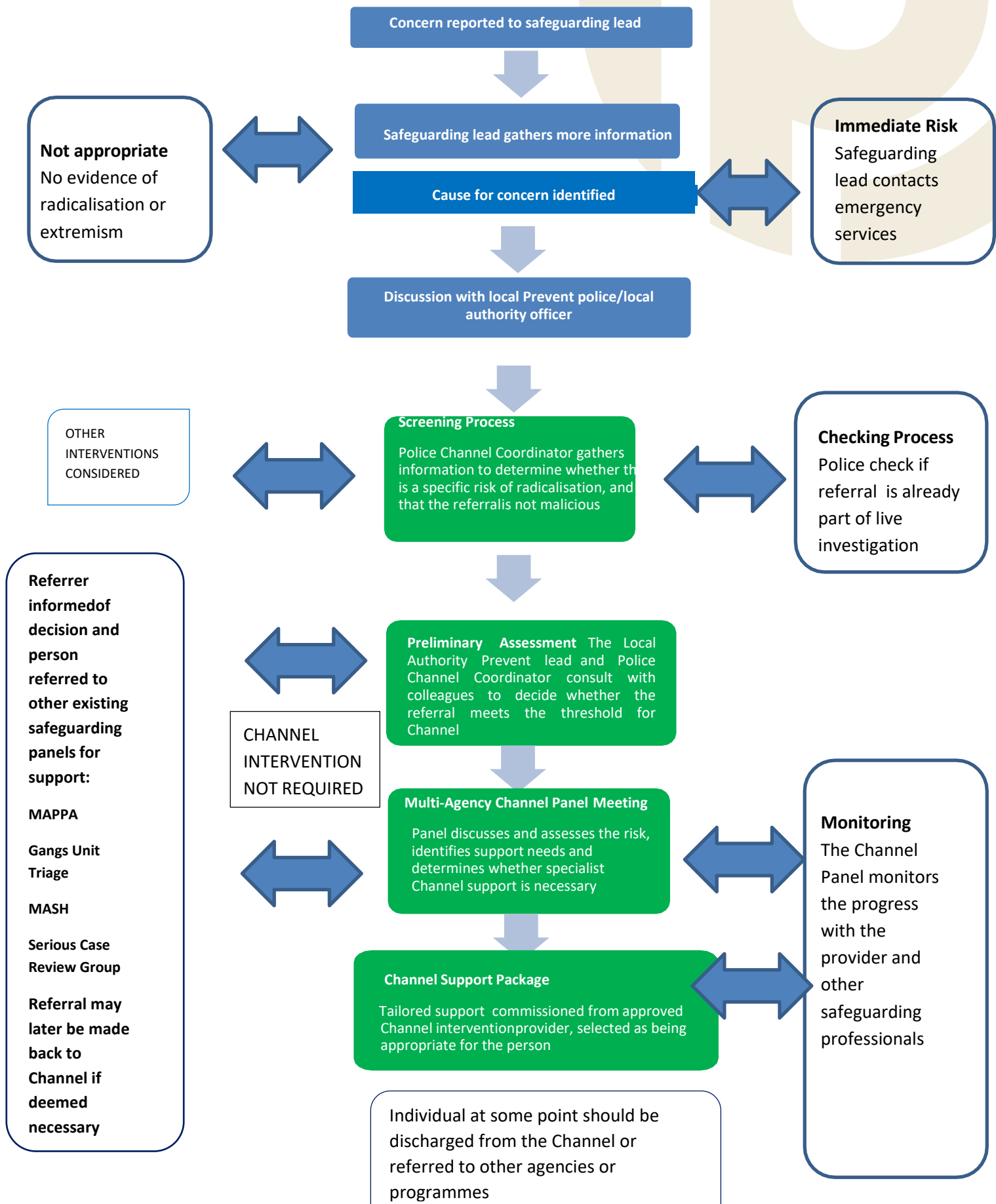
Referrals are first screened for suitability through a preliminary assessment by the Channel Coordinator and the local authority. If suitable, the case is then discussed at a Channel panel of relevant partners to decide if support is necessary.

Raising a concern

If you believe that someone is vulnerable to being exploited or radicalised, use the established safeguarding or duty of care procedures within PAL to escalate your concerns to the designated persons and in the case of PREVENT, this can include the Director of Audit and Compliance, who is PAL's single point of contact for external organisations working within the channel arena and any one of these people can contact the relevant PREVENT personnel in a given local authority.

More information regarding PREVENT and CHANNEL updated for 2023 can be found [here](#)

Typical Channel Process used in post-16 education in following diagram



Regulatory References

PAL is required to establish and maintain compliance with regulatory conditions and criteria. This policy relates to OFQUAL General Conditions of Recognition: suitability for continuing recognition A1; identification and management of risks A6; management of incidents A7; reviewing approach D3.
Condition EPA3 Notification to Ofqual of certain events in relation to EPAs.

Date Created: 06/07/2018

Last Review: 12/10/2023

Next Review: 12/10/2024

Persons Responsible for review: PAL Board

This Strategy and Plan has been agreed by Linda Martin, Managing Director

Appendix One Prevent Implementation and Risk Plan

Areas considered at high risk

Barking and Dagenham Birmingham Blackburn and Darwen Bradford Brent Camden Derby Ealing Hackney	Hammersmith and Fulham Haringey Kensington and Chelsea Lambeth Leeds Leicester Lewisham Luton Manchester	Newham Redbridge Stoke-on Trent Tower Hamlets Wandsworth Westminster
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Implementation and Risk plan (R- Red high risk; A-amber medium risk; G-green low risk)

No	Prevent Vulnerability/Risk Area	Risk Y/N	Action taken/already in place to mitigate/address risk	Owner	When	RAG
1	Leadership Do the following people have a good understanding of their own and institutional responsibilities in relation to the "Prevent Duty"? Board of Directors, Managers and all personnel to include associates and consultants/technical advisors	N	Prevent duty is built into our Safeguarding arrangements and training and updates are made available via emails and Padlet and on-line delivery. Staff are aware of PREVENT.	PAL Board	On- going	G
2	Partnership 1) Is there active engagement from the organisation's Directors, advisory group member's managers, quality, resource development and EPA team to include all assessors? 2) Does the institution have an identified single point of contact (SPOC) in relation to Prevent?	N	1) PAL Directors have all received training in PREVENT 2) Safeguarding policy is reviewed regularly – as a minimum on an annual basis with updates from an external expert in the area 3) The Prevent Lead for PAL is the Director of Audit and Compliance , supported by an external expert. He is	PAL Board	On- going	A

No	Prevent Vulnerability/Risk Area	Risk Y/N	Action taken/already in place to mitigate/address risk	Owner	When	RAG
			<p>responsible for oversight of the Prevent Action Plan & update to the Board</p> <p>4) The Board knows how make contact with local Prevent officers</p>			
3	<p>Staff Training</p> <p>Do all staff have sufficient knowledge and confidence to:</p> <p>1) exemplify British Values in their management, teaching and through general behaviours in the institution</p> <p>2) understand the factors that make people vulnerable to being drawn into terrorism and to challenge extremist ideas which are used by terrorist groups and can purport to legitimise terrorism</p> <p>3) have sufficient training to be able to recognise this vulnerability and be aware of what action to take in response</p>	N	<p>Personnel have received training and as part of their roles they are required to maintain their knowledge in these areas. The Quality team will ensure resources and materials are made available via the CPD Padlet</p> <p>Personnel understand the factors that contribute to people being drawn to terrorism, extremism or engaging in activities that could cause personal harm, or harm to others and know how to report such concerns.</p> <p>In Equality and Diversity training, personnel are advised of intention and impact and know when to challenge extremist ideas and address intolerance. Personnel are advised if they have any concerns and</p>	Board	Refresh Training arranged for 2021-2022	A

No	Prevent Vulnerability/Risk Area	Risk Y/N	Action taken/already in place to mitigate/address risk	Owner	When	RAG
			need further advice as to how to tackle a potential Safeguarding or PREVENT issue, they can contact the Designated Persons (MD; BOD; QD)			

PREVENT: What if scenarios, identified risks and mitigation.

PAL’s organisational structure, dispersed workforce, and nature of EPAO work, places the business in a relatively low risk category in respect of PREVENT. Nonetheless, PAL believes it is important that personnel are aware of the PREVENT and within the assessment process promote British values and identify and report behaviour or conduct from internal or external stakeholders, that contradicts British values.

PAL also recognises that for providers, Safeguarding and PREVENT are significant areas of interest in curriculum design and planning, and it is important that as an EPAO we understand this aspect of their programme delivery.

No	Scenario Presented	Likelihood 1=Low 2=Med 3=High	Severity 1=Low 2=Med 3=High	Score	Prevention Strategy (existing controls)	Response strategy	Risk Reduction
1	Terrorist threat received via e-mail, post, telephone, or other means	1	3	4	Freephone- Money Penny service- takes free phone calls- receptionists are trained to recognise and handle such calls Training of staff- to inform appropriate authorities immediately, providing as much evidence and information regarding the threat- training regarding taking such a call, questions to ask, listening for background noise, dialects etc. Guidance on safeguarding personal details and use of social media Threats received on personal email address, should be immediately reported to a PAL Director of Audit and Compliance and IT team and the Police.	Notify Police Notify Director of Audit and Compliance Notify colleagues	Monitor
2	Radicalisation of colleague	1	3	4	Training to recognise behavioural changes. Whistleblowing policy Safeguarding policy.	Inform designated persons MD; BOD; QD	DBS checks and renewals Monitor
3	Breach of IT (IT system hacked or virus). Theft of property (laptops;	1	3	4	Malware and firewalls; company approved laptops and software; staff advice and tips on how to keep information and software secure- IT policy; Padlet and training. Lock down	Notify BOD, in their absence EPA Manager who will notify colleagues employers and	Continuous review of IT policy Malware programmes

No	Scenario Presented	Likelihood 1=Low 2=Med 3=High	Severity 1=Low 2=Med 3=High	Score	Prevention Strategy (existing controls)	Response strategy	Risk Reduction
	smartphones)				of system and removal from accounts-IT (central) controlled, Password protection. Laptops all issued with individual ID. Apprentices in the main utilise own equipment, any laptops used by apprentices that are PAL's are signed in and out by the EPA managers. Laptops are able to guest sign-in logs so guest users cannot add or access folders or upload materials; alternatively, PAL has spare laptops for testing purposes.	Apprentices if threat will affect them directly Notify IT team who will. Lock down IT system. If content has a result of the hack contains material that is of concern, report to local Prevent Officer.	and automatic scanning in place and IT team able to remote into laptops
4	Staff concerns about a particular apprentice or employer location, concerns can be related to individuals' behaviours. individuals' well-being and personal and general safety	1	3	4	Safeguarding and whistleblowing policies; staff training regarding personal safety and how to report concerns. Google calendars/EPAPro providing information on personnel locations. Phoning colleagues pre and post site visits, if assessing out of office hours	Personnel to notify one of the designated persons MD; BOD; QD. If appropriate to notify employer/provider if the concern relates to an employee of theirs or an apprentice.	Monitor