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Prevent Policy

Policy Overview	
Last Review Date	01.12.2021
Next Review Date	02.12.2022 (unless legislation changes)
Responsibility of	Rachel Thomas
Version Control	PreventPolicy_271016_v1 PreventPolicy_230819_v2 PreventPolicy_Oct2019_v3 Prevent Policy_v4_230920_SB Prevent Policy_v5_300421_JW Prevent Policy_v6_011221_RT
Policy Links	Data Protection Policy Safeguarding Policy
Supporting Documentation	Prevent Risk Assessment Appendix B

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1: Scope & Purpose

WELL Associates Ltd is committed to protecting freedom of speech and academic freedom together with protecting and safeguarding its students and staff from the risk of being drawn into terrorism

This Policy is written with reference to the Counter Terrorism and Security Act 2015 and revised guidance issued by the Department for Education on 1 April 2021 ⁽¹⁾

The Act places a duty on learning providers to have 'due regard to the need to prevent people from being drawn into terrorism.'

Terrorism is defined as violent extremism and non-violent extremism, which can create an atmosphere conducive to terrorism and can popularise views which terrorists exploit.

The Act also notes that learning providers must seek to balance this duty with their commitment to freedom of speech and the importance of academic freedom.

2: Key Responsibilities

This Policy applies to all WELL staff, students, contractors and visitors (the 'WELL Community').

WELL Associates will seek to identify, protect and support individuals who it believes may be at risk of being drawn into terrorism.

WELL Associates discharges this responsibility in partnership with other agencies, including the Police, Local Authorities and the network of regional Prevent Co-ordinators.

This policy describes WELL Associate's contribution to this multi-agency Prevent agenda. It also defines the process for referral into the local Channel processes.

The Channel programme has been developed as part of the Prevent Strategy to provide support to people at risk of being drawn into terrorism.

¹ <https://www.gov.uk/government/publications/prevent-duty-guidance/prevent-duty-guidance-for-further-education-institutions-in-england-and-wales>

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3: General Principles

- WELL Associates will maintain a risk assessment to identify potential risks associated with students or staff being drawn into terrorism. The latest Risk Assessment is appended to this policy see Appendix A
- On the basis of this risk assessment WELL Associates will identify any actions which need to be taken to mitigate these risks and develop an appropriate action plan.
- WELL Associates will ensure that all staff members are provided with appropriate training as outlined in the Counter Terrorism and Security Act Statutory Guidance (by assisting all staff to undertake Education and Training Foundation online learning programmes)
- WELL Associates will ensure that members of staff at WELL are made aware of the process for referring concerns regarding staff and vulnerable learners (see Section 5 below).
- WELL Associates provides support for all faiths, and none.
- WELL Associates will nominate Prevent Leads, Jackie Wyke and Rachel Thomas whose duties will include:
 - ✓ Ensuring relevant updates on the Prevent Agenda and on threat levels are communicated to the appropriate WELL staff
 - ✓ Ensuring relevant staff are provided with appropriate training

4: Raising Concerns

Any member of WELL Associates may identify concerns about a member of the WELL potentially being drawn into terrorism based on information received or behaviour observed.

It is important that such concerns can be shared in a safe and supportive fashion to enable concerns to be investigated and an appropriate intervention to be developed, if required.

It is equally important that assumptions are not made on the basis of information received and that referrals are investigated thoroughly and fairly. Local risks are carefully monitored and reported where required.

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WELL Associates will seek to approach such concerns from the perspective of safeguarding the individual about whom concerns have been expressed.

Only where there is clear and compelling evidence of a requirement to do so will information be shared with other agencies in accordance with WELL Policy.

A flowchart for the process of reporting concerns is included in Appendix A

A decision will be made as to the seriousness of the case. These are the potential outcomes likely at this stage:

No further action is required:

In this case a confidential record of the case will be kept by the Safeguarding and Prevent lead, records would be kept, no further action is required.

There is substance to the case but at this stage only internal action is required:

The exact nature of the intervention required would be determined by discussion between relevant staff members. Actions and a review date will be agreed.

At the review the case would be assessed again; and the appropriate actions taken. It is anticipated that in the majority of cases the intervention would be supportive and safeguarding in nature.

A referral to the police is required because there are serious issues of safety to the student, staff member, visitor, contractor or others, and/or there is evidence to suggest a criminal act may be committed or has been committed:

This decision would be taken only in the most serious of circumstances and only by the Safeguarding and Prevent lead.

A referral to the police is required because there are immediate serious issues of safety to the WELL/or others, and/or there is evidence to suggest a criminal act may be committed or has been committed:

This would be dealt with by following the emergency procedures of WELL Associates to contact the police.

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5: Information Sharing

In reaching a decision to share any information with third parties, WELL Associates will adhere to its GDPR principles contained therein.

In following the referral process outlined in Appendix A there may be instances where WELL Associates is sufficiently concerned by a WELL Associate's member's behaviour and the risk, they potentially pose that it will need to share these concerns with external agencies at all levels.

This may include referral to the Channel Programme and/or the Police.

In sharing such information with external parties WELL Associates will share only sufficient and relevant information in order to allow the concern to be appropriately followed.

Records relating to any information shared will be kept in accordance with the Data Protection Act (2018) and GDPR.

6: Revision

This Policy will be revised as necessary in the light of statutory changes, new guidance and/or experience of its operation.

7: References

- **Prevent Duty Guidance:**

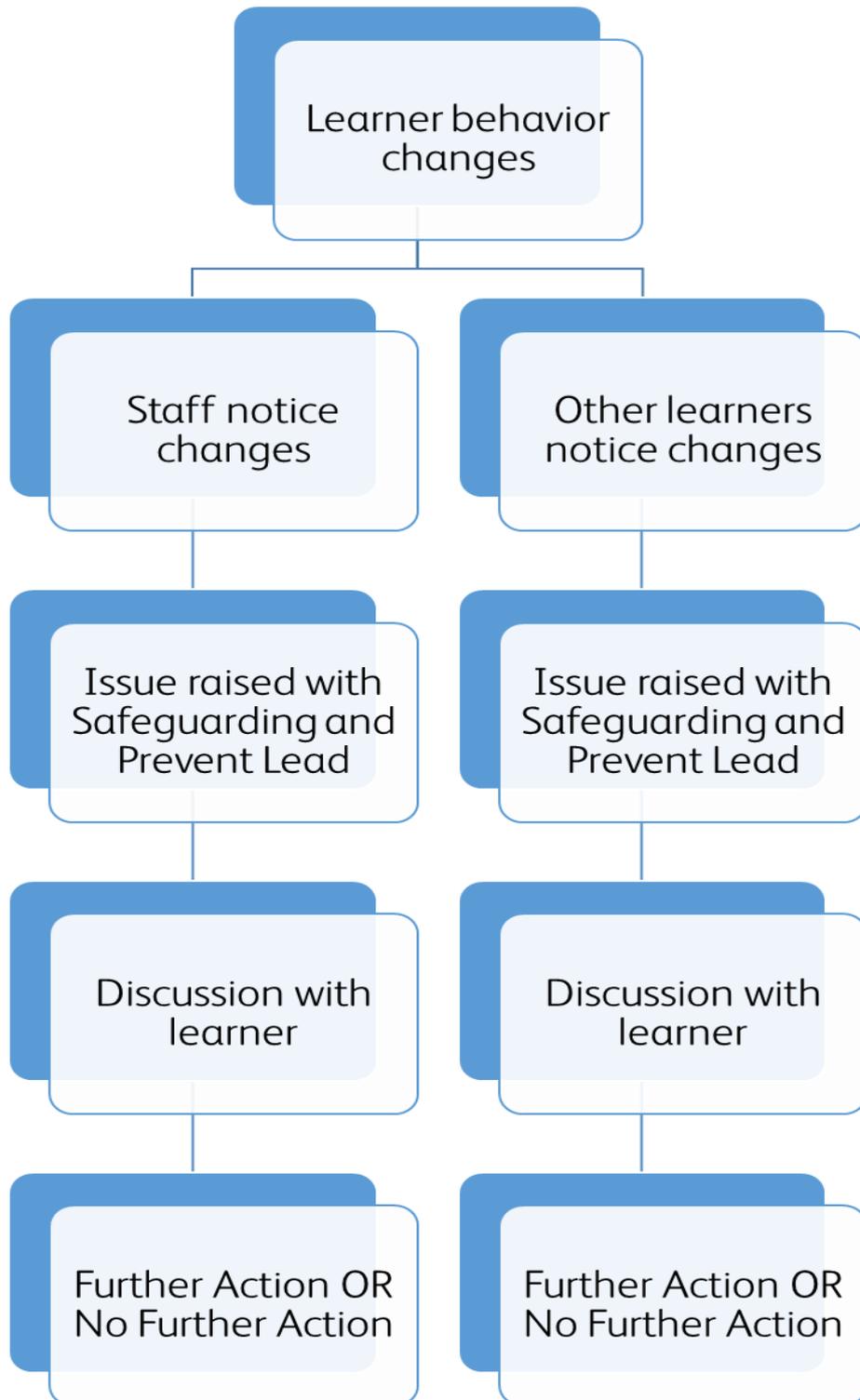
<https://www.gov.uk/government/publications/prevent-duty-guidance/prevent-duty-guidance-for-further-education-institutions-in-england-and-wales>

- **Counter Terrorism Strategy:**

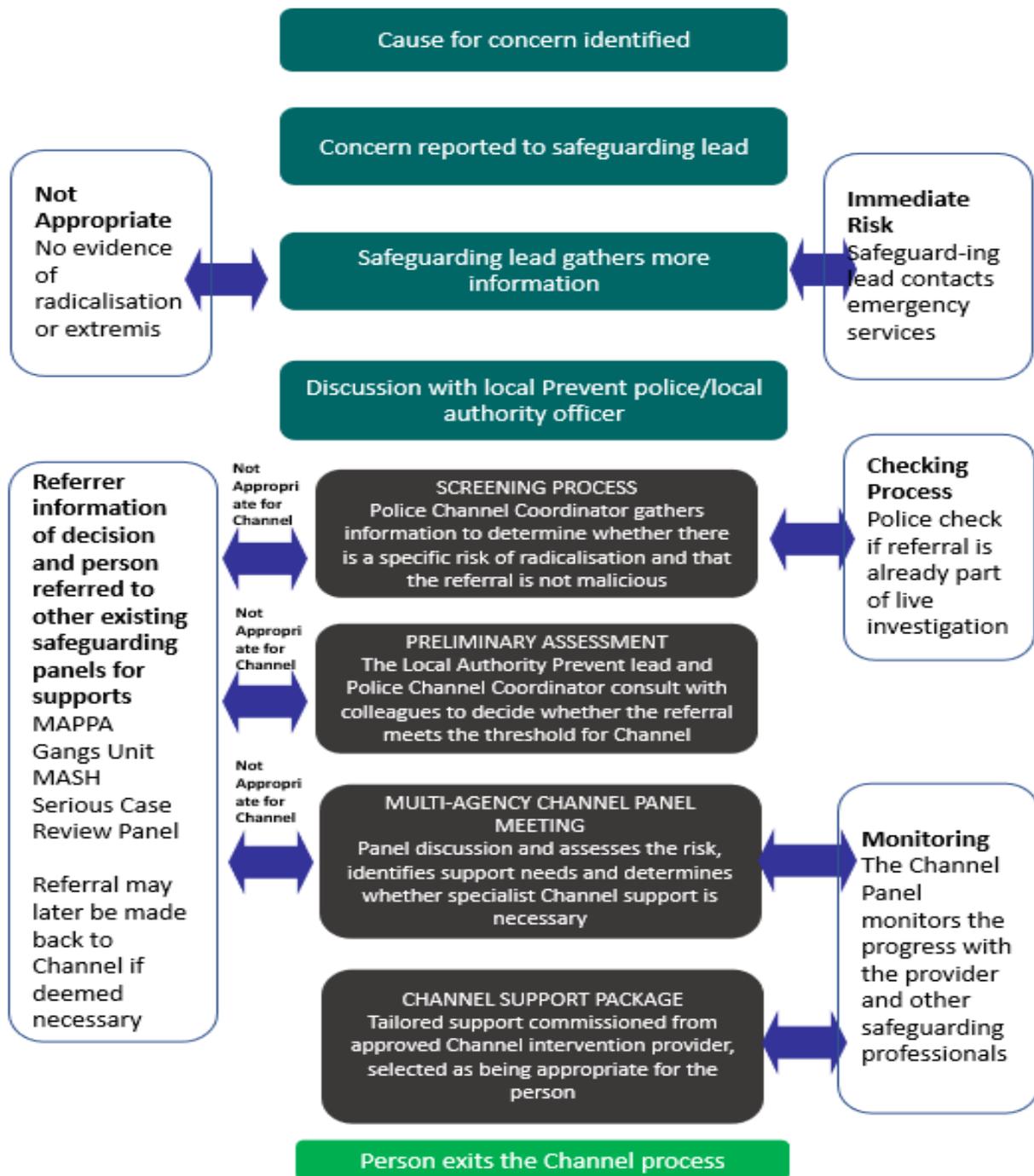
- https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/716907/140618_CCS207_CCS0218929798-1_CONTEST_3.0_WEB.pdf

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APPENDIX A: Flowchart for reporting concerns with a learner:

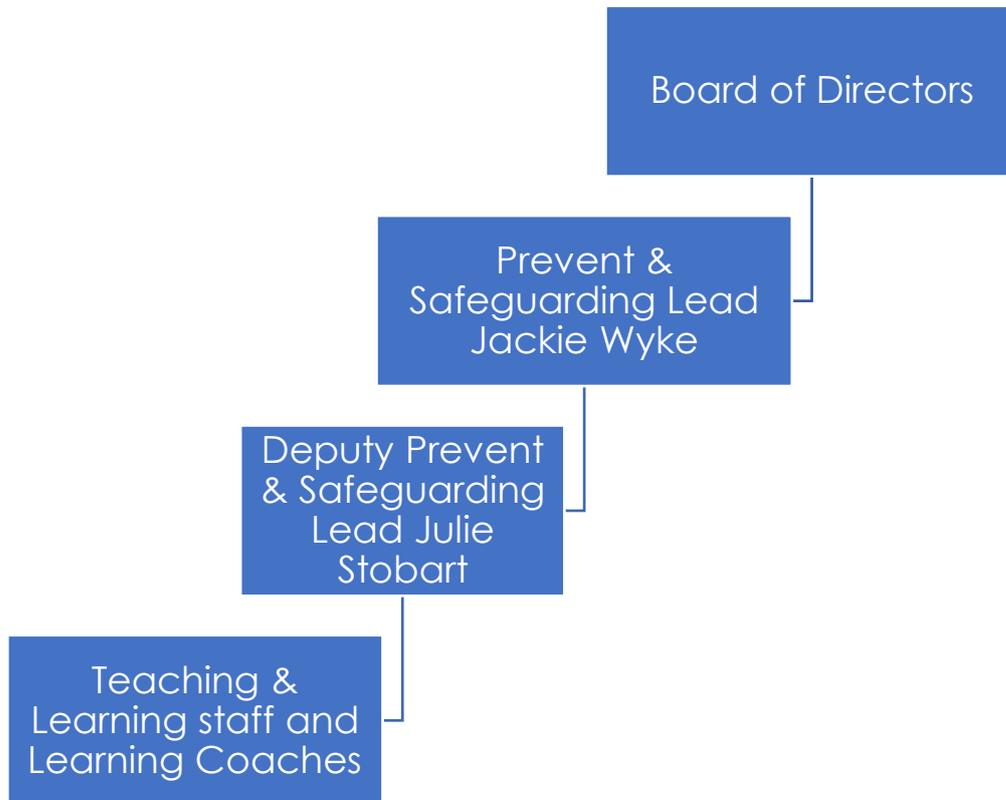


CHANNEL PROCESS



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SAFEGUARDING AND PREVENT FAMILY TREE



APPENDIX 6 – CURRENT PREVENT RISK ASSESSMENT



WELL ASSOCIATES LTD - Prevent Risk Register v1

DATE	1 st December 2021	COMPLETED BY	Rachel Thomas
PROFESSIONAL COMPETENCE HELD	<p>Jackie Wyke</p> <p>L2 Certificate in Understanding Safeguarding, Prevent and British Values</p> <p>L3 Designated Safeguard Lead Training</p> <p>NEBOSH Certificate in Occupational Health and Safety</p>	DATE FOR REVIEW	December 2022 unless changes in legislation OR any Prevent or Safeguarding Issues are logged
PROFESSIONAL COMPETENCE HELD	<p>Rachel Thomas</p> <p>L2 Advanced Safeguarding for Adults</p> <p>L2 Advanced Safeguarding for Children</p> <p>Prevent and British Values</p> <p>L3 Designated Safeguard Lead Training</p>	DATE FOR REVIEW	December 2022 unless changes in legislation OR any Prevent or Safeguarding Issues are logged

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		IOSH Certificate NEBOSH- Undertaking in February					
INTENDED OUTCOME	RISK AREA	ACTIONS TAKEN	OWNER	FURTHER ACTIONS TO BE TAKEN	EVIDENCE OF EXISTING PROGRESS	RAG	
LEADERSHIP – Risk score 2 (Low)							
The organisation takes ownership of extremism and radicalisation concerns and appropriate oversight of the Prevent agenda is provided	There is a lack of clarity within the organisation regarding a systemic approach to respond to the Prevent duty	The organisation has an identified point of contact in relation to Prevent	Designated Safeguarding Leads; CEO	Additional Prevent lead identified within WELL	All staff are Prevent trained, by West Midlands Police Safeguarding leads link with identified point of contacts internal and external following referrals		
		Governors and Senior Management Team have an understanding, shared with partners, of where and how their learners might be at risk of being drawn into terrorism, including support for the extremist ideas that are part of terrorist ideology	Designated Safeguarding Leads; CEO	All staff to complete Level 2 Prevent qualification	Monthly Safeguarding and Prevent updates and discussions at SMT Board quarterly updates and reports Strong links with West Midlands Police Prevent team Regular CPD inputs for all staff		
		There is active engagement from the WELL Board, SMT, managers and leaders.	Chair of Board, CEO, Designated Safeguarding Leads;	All leaders to complete the ETF Foundation Training Modules by end of	CEO actively engages with WM Prevent Lead including participating in Multi-Agency Prevent workshops		

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				financial year (31-07-21)	<p>Quality processes are followed to ensure policies and procedures are in place and impact recorded. Observations and walkthroughs in place, including Board to ensure Prevent and British values work is covered.</p> <p>Prevent incorporated into hot topics covered and followed up and supported by Learning Coaches to support embedded work. Inclusion in WELL Self-Assessment planning, all staff updates and regular team meeting updates across WELL.</p>	
		Prevent is included within WELL's safeguarding policy/policies, in addition to any related policies	Designated Safeguarding Leads; CEO		<p>Separate Prevent policy in place to be read in conjunction with the Safeguarding Children and Vulnerable Adults Policy and Procedure updated in accordance with legislation. Prevent is included in all related policies.</p>	

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Promoting British Values	Promoting British Values	Whilst British Values is embedded into Schemes of Work and into relevant Hot Topics a stand-alone piece of work around British Values should be considered	Designated Safeguarding Lead, Curriculum Lead, Learning Coaches, CEO	Learners to be offered opportunity to complete a stand-alone qualification around British Values to support professional and personal development around chosen Apprenticeship standard(s)	Learners receive British Values information at induction and the SoW is linked to British Values, with these highlighted during the sessions. Discuss at end of year Away Day	
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INTENDED OUTCOME	RISK AREA	ACTIONS TAKEN	OWNER	FURTHER ACTIONS TO BE TAKEN	EVIDENCE OF EXISTING PROGRESS	RAG
CAPABILITIES – Risk score 2 (Low)						
The organisation proactively supports the multi-agency delivery of the Prevent duty	<p>The organisation delivers Prevent actions in isolation and good practice is not shared with partners</p> <p>The organisation does not effectively share information and vulnerable individuals are not given appropriate and possible support</p>	Active engagement around Prevent between Board, CEO, managers and local partners	Chair of Board, CEO, Designated Safeguarding Lead	All new Board to participate in annual Prevent training from West Midlands Police.	<p>Quality processes are followed to ensure policies and procedures are in place and impact recorded.</p> <p>Observations and walkthroughs in place, to ensure Prevent and British values work is covered.</p> <p>Learning Coaches support and co-ordinate work directly with learners</p> <p>Inclusion in WELL Self-Assessment planning, team meetings and updates</p> <p>Monthly Safeguarding and Prevent updates</p> <p>Board quarterly updates</p> <p>Regular engagements with West Midlands Police Prevent team including multi-agency delivery and support</p>	
		Prevent and British Values embedded	Designated Safeguarding Lead,		British values are embedded into each taught session of the	

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INTENDED OUTCOME	RISK AREA	ACTIONS TAKEN	OWNER	FURTHER ACTIONS TO BE TAKEN	EVIDENCE OF EXISTING PROGRESS	RAG
CAPABILITIES – Risk score 2 (Low)						
		throughout the curriculum in addition to specific Hot Topic subjects	Curriculum Lead, Learning Coaches, CEO		curriculum, with additional learner hot topics around Prevent and British Values. Also discussed at monthly coaching sessions with Learning Coaches.	
		Support the Channel project by attending and supporting multi agency Channel panel meetings where relevant	Designated Safeguarding Lead, CEO		Currently WELL have made no referrals and therefore have not had requirement to participant in a Channel Panel meeting.	
		Internal and external procedures in place to share information about vulnerable individuals including information sharing agreements.	Designated Safeguarding Lead, Curriculum Lead, Learning Coaches, CEO		Safeguarding Children and Vulnerable Adults Policy and Procedure references sharing of information external to WELL Associates and will take place within the framework outlined by 'Information Sharing' (DfE, July 2018) and Working Together to Safeguard Children (July 2018). Consent for sharing this information will be gained wherever possible.	
The organisation has a clear	The organisation does not	Regular liaison with local West Midlands Police Prevent Team.	Designated Safeguarding Lead, Curriculum Lead,		An annual CPD input is provided to all staff at WELL by West Midlands Police Counter Terrorism	

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INTENDED OUTCOME	RISK AREA	ACTIONS TAKEN	OWNER	FURTHER ACTIONS TO BE TAKEN	EVIDENCE OF EXISTING PROGRESS	RAG
CAPABILITIES – Risk score 2 (Low)						
<p>understanding of the local risks related to extremism and radicalisation . The most prominent risk associated with our local area is currently right-wing extremism and Islamic extremism.</p>	<p>access available intelligence leading to a failure: to develop a comprehensive action plan; and effectively support vulnerable individuals</p>		Learning Coaches, CEO		<p>Unit outlining a refresher on both the Prevent duty and Channel process but also an update on prevalent, developing risks both nationally and locally. Also sharing case studies of radicalisation in Education settings, how to spot these and how to mitigate.</p> <p>Ongoing CPD responsive to local trends and updates e.g County Lines, Gang Awareness, extremist groups. A central CPD log is also maintained.</p>	
		Learners are engaged and consulted on implementation of our Prevent duty	Designated Safeguarding Lead, Curriculum Lead, Learning Coaches, CEO		Prevent is discussed as part of Learner induction, and ongoing as Learners involved in additional Hot topic discussions around Prevent and British values, and involvement, inclusion in Equality, Diversity and Safeguarding.	

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INTENDED OUTCOME	RISK/ VULNERABILITY	ACTIONS TAKEN	OWNER	FURTHER ACTIONS TO BE TAKEN	EVIDENCE OF PROGRESS	RAG
RESOURCES – RISK RATING 2						
WELL venues and resources do not provide a platform for extremists and are not used to disseminate extremist views	Online radicalisation, which can include accessing inflammatory material or online grooming, is an ever-increasing danger	Ensure that IT equipment owned by the organisation is covered by appropriate security software and firewalls to limit extremist material	Designated Safeguarding Lead, Curriculum Lead, Learning Coaches, CEO	Additional review of firewalls following return to face-to-face learning	IT Systems are in place across the organisation. This includes blocking of material which is linked to discrimination/hate.	
		IT policies are in place to ensure that staff and students are protected from terrorist related content		Additional review of IT policies in line with new Safeguarding guidelines for FE	All staff and learners are aware of the internal social media policy and WELL underwent a Cyber Security Assessment late in 2020 Prevent and safeguarding policies and procedures define sharing protocols in line with legislation.	

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INTENDED OUTCOME	RISK/ VULNERABILITY	ACTIONS TAKEN	OWNER	FURTHER ACTIONS TO BE TAKEN	EVIDENCE OF PROGRESS	RAG
RESOURCES – RISK RATING 2						
<p>There are sufficient pastoral care and support resources for all Learners</p>	<p>Learners feel unsupported and isolated and are therefore at greater risk of radicalisation. Safeguarding capacity is jeopardised; vulnerable individuals are not identified and not provided with appropriate levels of support</p>	<p>Sufficient welfare support is in place for all learners.</p>	<p>Designated Safeguarding Lead, Curriculum Lead, Learning Coaches, CEO</p>	<p>Learning coaches to undertake the NCFE L2 Understanding Safeguarding and Prevent and ensure CPD from the ETF in relation to Prevent for recommend professional level i.e., practitioner</p>	<p>One to one tutorials with Learning Coaches take place within apprenticeship programme on a minimum monthly basis, which supports identification of need.</p> <p>Employers are briefed regarding Prevent duty and included for work-based learning students where areas of concerns are identified.</p> <p>Referral process to Learner safeguarding and wellbeing is established across WELL and communicated to students and staff using variety of mediums</p> <p>Policies and Procedures are monitored by the Senior Leadership Team and through quality monitoring processes</p>	

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INTENDED OUTCOME	RISK/ VULNERABILITY	ACTIONS TAKEN	OWNER	FURTHER ACTIONS TO BE TAKEN	EVIDENCE OF PROGRESS	RAG
RESOURCES – RISK RATING 2						
		Arrangements for managing prayer and faith related facilities are accessible to staff and students		A dedicated space could be made available as part of future growth	<p>A Prayer room is available upon request to all students and staff. Previous years have seen rooms provided for prayer and contemplation (although a formal prayer room is not available a small administration room has been allocated as a temporary prayer room)</p> <p>Multi faith calendar to be used to support curriculum planning and festival holidays to be avoided wherever practicable possible.</p>	
	Speakers and events	Due to the COVID pandemic and various lockdown restrictions external speakers have not been used since the start of the Pandemic in March 2020	Designated Safeguarding Lead, Curriculum Lead, Learning Coaches, CEO	Ensure same reference checks in place for any guest speakers as we would for any staff members.	A risk assessment is carried out for any internal speaker coming in to WELL to speak which considers the risk posed to learners by any speakers.	

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Risk Scoring

Likelihood		Severity	
Almost Certain	5	Catastrophic	5
Very Likely	4	Major	4
Likely	3	Moderate	3
Unlikely	2	Minor	2
Improbable	1	None or Trivial	1