

PREVENT POLICY

KEY CONTACTS

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PREVENT

Preventing violent and non-violent extremism and radicalisation at JS Consult Limited in line with the Government Prevent Strategy.

The purpose of this policy is to:

1. ensure an awareness of “Prevent” within the Company;
2. provide a clear framework to structure and inform our response to potential radicalisation, including a supportive referral process for those who may be susceptible to the messages of extremism;
3. to provide a framework to embed British Values into the curriculum and ways of working;
4. recognise current practice which contributes to the Prevent agenda and identify areas for improvement

WHY DO WE NEED THIS POLICY?

Background Information

Prevent is one of four strands of the Government’s counter terrorism strategy – CONTEST. The UK currently faces a range of terrorist threats. Terrorist groups who pose a threat to the UK seek to radicalise and recruit people to their cause. Therefore, early intervention is at the heart of Prevent which aims to divert people away from being drawn into terrorist activity.

Who does this policy apply to?

The Prevent Policy applies to everyone working at or attending JS Consult. It places responsibilities on all governors; staff; learners; agency staff and volunteers; contractors; visitors; consultants; and those working under self-employed arrangements.

Statement

JS Consult has adopted the Prevent Duty in accordance with legislative requirements.

The aim of the Prevent Policy contributes to maintaining a safe, healthy and supportive learning and working environment for our learners, staff and visitors alike. We recognise that extremism and exposure to extremist materials and influences can lead to poor outcomes for learners. We further recognise that if we fail to challenge extremist views, we are failing to protect our learners from potential harm. As such, the Prevent agenda, will be addressed as a safeguarding concern and dealt with in accordance with guidance from the National Office of Counterterrorism.

Prevent happens before any criminal activity takes place by recognising, supporting and protecting people who might be susceptible to radicalisation. the national Prevent Duty confers mandatory duties and responsibilities on a range of public organisations, including Further Education Colleges, and seeks 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; and
- 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.

RELATED LEGISLATION

- The Young people Act 1989
- The Young people Act 2004
- Working Together to Safeguard Young people 2018
- What to do if you are worried a child is being abused 2015
- Keeping Young people Safe in Education (KCSIE) September 2020
- Protection of Freedoms Act 2012
- Care Act 2014
- Keeping Learners Safe 2015
- Safeguarding Young people: Working Together Under the Young people Act 2004 a Disqualification under the Childcare Act 2006 (2018)
- Counter Terrorism and Security Act 2015
- Prevent Duty Guidance for England and Wales (2015)
- Channel Duty Guidance: Protecting vulnerable people from being drawn into terrorism 2015
- Multi-agency guidance on FGM (2016)
- Modern Slavery Act (2015)
- Information sharing advice for practitioners providing safeguarding services (2018);
- Young people missing in Education (2016)
- Child sexual exploitation: definition and a guide for practitioners, local leaders and decision makers working to protect young people from child sexual exploitation (2017)
- Sexting in schools and colleges: responding to incidents and safeguarding young people (UK Council for Child Internet Safety (UKCCIS), 2016);
- Sexual violence and sexual harassment between young people in schools and colleges (2018)
- General Data Protection Act (2018)
- Specific roles and responsibilities concerning Safeguarding.

RELATED POLICIES, PROCEDURES, AND TEMPLATES

- Safer Recruitment Policy
- DBS Policy
- Safeguarding Policy
- Lone Worker Policy
- E-Safety Policy

DEFINITIONS

The following are commonly agreed definitions within the Prevent duty:

- an ideology is a set of beliefs;
- radicalisation is the process by which a person comes to support terrorism and forms of extremism that may lead to terrorism;
- safeguarding is the process of protecting vulnerable people, whether from crime, other forms of abuse or from being drawn into terrorism-related activity;
- terrorism is an action that endangers or causes serious violence, damage or disruption and is intended to influence the government or to intimidate the public and is made with the intention of advancing a political, religious or ideological agenda;
- vulnerability describes factors and characteristics associated with being susceptible to radicalisation; and
- extremism is vocal or active opposition to fundamental British Values, including democracy, the rule of law, individual and mutual respect and tolerance of different faiths and beliefs.

AIMS

Leadership and Values

To create and maintain an ethos that upholds core values of shared responsibility and wellbeing for all learners, staff and visitors whilst promoting respect, equality and diversity and understanding.

This will be achieved through:

- promoting core values of respect, equality and diversity, democratic society, learner voice and participation;
- building staff and learner understanding of the issues and confidence to deal with them through mandatory staff training, specialist tutorials and awareness campaigns etc;
- actively working with the representatives from the community, external partners and public services.

Teaching and Learning

To provide a curriculum that promotes British Values, knowledge, skills and understanding, to build the resilience of learners by undermining extremist ideology and supporting the learner voice.

This will be achieved through:

- embedding 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 challenge extremist narratives and promote universal rights;
- teaching, learning and assessment strategies that explore controversial issues in a way that promotes critical analysis;
- encouraging active citizenship and learner voice.

ROLES AND RESPONSIBILITIES

Whilst this is a stand-alone policy, it is integral to our Safeguarding Policy and should be applied as an extension to JS Consult's current and established safeguarding procedures.

The Board of Directors – Senior Managers

All Board Directors and Senior Managers have a legal responsibility under the Prevent Duty to make sure they have undertaken training in the Prevent Duty. Additionally, they must ensure that:

- all Company staff have undertaken training in the Prevent Duty;
- all Company staff are aware of when it is appropriate to refer concerns about learners or colleagues to the Safeguarding Officer;
- all Company staff exemplify British Values into their teaching; and
- policies and procedures to implement the Prevent Duty are in place and acted on where appropriate.

PREVENT LEAD FOR JS Consult Limited

The Head of Compliance & Operations Manager Zainab Aliya is the Prevent Lead, with responsibility for ensuring that our Prevent Policy is implemented across the Company and that any concerns are shared with the relevant organisations, in order to minimise the risk of our learners becoming involved with terrorism. The Managing Director – Human Resources will ensure that all new members of staff will receive Prevent training as part of their induction programme.

SAFEGUARDING AND GOVERNANCE

The Senior Management Team are presented with a termly report to discuss Safeguarding and Prevent concerns raised and changes to the Duty that affect JS Consult are discussed at these meetings.

All Staff

All staff at the JS Consult have a responsibility to:

- create and support an ethos that upholds the Company's mission, vision and values including British Values, to create an environment of respect, equality and diversity and inclusion;
- attend Prevent training 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 safeguarding reporting channels;
- report and remove any literature displayed around the Company that could cause offense or promote extremist views;
- support the development of staff and learner understanding of the issues around extremism and radicalisation;
- participate in engagement with external organisations as appropriate.

RAISING AWARENESS OF THE POLICY

All new members of staff are made aware of this policy and are given time to read it during their induction period. Where appropriate to their role, staff will receive the appropriate level of training which includes Safeguarding training and Prevent training in respect of the Counter Terrorism and Security Act 2015.

All staff will be trained in the appropriate response to a disclosure and the correct procedure for dealing with concerns. Staff will work proactively to protect people from abuse and neglect and prevent people being placed in an abusive situation.

Ongoing support will also be provided to make sure that staff are informed and confident to take appropriate preventative and responsive steps. Information, advice and guidance for staff will be available and regularly updated through briefings at staff meetings and training interventions.

eLearning Modules

- All staff are required to successfully complete Safeguarding and Prevent eLearning modules every year, while new members of staff will receive this training as part of their induction.

Face to Face Training

- In addition to the eLearning modules, those who work in a regulated activity, will be required to undergo face to face training at a local level.
- This face-to-face training will be carried out by safeguarding leads and will be appropriate to each specific business area.
- Regular safeguarding updates will also be provided to support the face-to-face training, with a special focus on a bi-monthly basis.

INITIATING THE RISK ASSESSMENT PROCESS

Organisations are required under health and safety legislation to protect people as far as is 'reasonably practicable'. In particular, the Management of Health and Safety at Work Regulations 1999 require organisations to assess the risks in their workplaces and to put plans in place to control the risks.

The Young people & Vulnerable Adults Safeguarding & Prevent risk assessment process will be initiated by the following circumstances (although other situations may trigger this procedure if deemed appropriate by the department):

- Recruitment to a new or existing post which involves working with young people and/or vulnerable adults
- The commencement of new activities or events involving or potentially involving young people and/or vulnerable adults
- Changes being made to activities or events involving or potentially involving young people and/or vulnerable adults.

Once it has been identified that the risk assessment process should be initiated, it is vital that the person responsible for the relevant recruitment campaign, activity or event includes completion of this within the planning process and ensures that it is completed.

MANAGING RISKS AND RESPONDING TO EVENTS

JS Consult will ensure that it monitors risks and is ready to deal appropriately with issues which arise through the following:

- understanding the nature of threat from violent extremism and how this may impact directly and indirectly on the Company;
- identifying, understanding and managing potential risks within the Company from external influences;
- responding appropriately to events reported via local, national or international news that may impact on learners and communities;
- ensuring plans are in place to minimise the potential for acts of violent or non-violent extremism within the Company;
- ensuring measures are in place to respond appropriately to a threat or incident within the Company; and
- continuously developing effective ICT security.

IDENTIFYING REQUIRED CHECKS

Once the key duties and responsibilities of the activity are determined, one of the required actions must be to identify which checks, if any, are required prior to the individual working with young people and/or vulnerable adults.

In addition, the department must consider if any required checks should be treated as essential before employment (that is, that the new employee recruited to the role should not be able to start work until the check is completed).

PRE-EMPLOYMENT CHECKS

All staff have Right to Work in the UK ID checks; DBS checks are carried where relevant to their role.

We are registered with criminal record check provider. Their comprehensive service is registered with both the Disclosure and Barring Service (DBS) and Disclosure Scotland.

There are two types of check available from the DBS. The default check will be the standard, except for people that are identified as requiring an enhanced check.

- Standard – contains details of all spent and unspent convictions, cautions, reprimands and warnings held on the Police National Computer (PNC) that are not ‘protected’. Protected convictions and cautions are normally old and minor; they are filtered by the DBS so they are not disclosed, and they must not be taken into account by employers. The filtering rules and the list of offences that will never be filtered are now available for you to view on the DBS’s web pages.
- Enhanced – contains the same information as the standard check but also any relevant and proportionate information held by the local police forces. In addition, where the role is eligible, registered bodies can request a check on whether a person is barred from working with young people or adults in regulated activity (particular types of work with young people and adults).

Following the DBS application, it is the requirement of JS Consult that required staff will subscribe to the DBS Update Service. JS Consult will reimburse the annual fee for this service via the staff expenses claim process for the duration of their employment with JS Consult. With the individual’s permission, routine status checks will be carried out on an annual basis.

PORTABILITY

DBS checks are not portable. Any DBS check that has not been carried out by JS Consult will not be accepted as meeting our requirements for a post-holder.

Exceptions to this are as follows:

- Where an individual has subscribed to the DBS Update Service – this means that their DBS check will be kept up-to-date and they can take this with them from role to role, where the same level and type of check is needed. With the individual’s permission, representatives from JS Consult will be able to go online to do a free, instant check (known as a status check) to confirm that their DBS Certificate is still up to date.
- Where a DBS check or basic disclosure has been carried out within the last 12 months by JS Consult for a post with comparable duties – individual cases will need to be discussed with the group’s Designated Safeguarding Officer’s agreement provided that another check is not required.

DISCLOSURE OF A CRIMINAL RECORD

Where a criminal conviction is disclosed by an applicant or through a DBS check/basic disclosure, JS Consult’s Designated Safeguarding Lead and HR will assess and discuss using current guidelines and policy.

Possible outcomes include amended duties, redeployment, withdrawal of an offer of employment or, where the individual started work before the relevant screening check was completed, dismissal.

GUEST SPEAKERS

JS Consult believes that guest speakers can enrich our education programmes and other areas of our business by adding depth and breadth on a range of subjects. This can especially help to prepare our learners and all young people we engage with for life in modern Britain and to further extend their employability and vocational skills.

In relation to this, it is JS Consult's policy that guest speakers should:

- o follow the same signing in procedures as other visitors
- o not be left alone with learners, young people, young people or vulnerable adults unless they have a current DBS which we have had sight of and logged
- o have their views countered and balanced by our employees, self-employed contractors or volunteers should they have any extreme views, whether political or religious.

REVIEW

This policy will be reviewed on an annual basis or following changes to Government updates and statutory guidance in relation to Covid-19 and company risk assessment policies and processes.

APPENDIX A

The Procedure

Dealing with reported suspicions and allegations

Concerns for the safety and wellbeing of young people and vulnerable adults could arise in a variety of ways and in a range of situations. For example, a child/vulnerable adult may report or show signs of abuse, someone may hint that a child/vulnerable adult is at risk or that a colleague is an abuser, or someone may witness abuse.

According to the Department for Education and Skills, there are eight main types of abuse, which are outlined above. It is not always easy to recognise a situation where abuse may occur or has taken place and employees are not experts at such recognition. However, each person has a responsibility to act if they have any concerns about someone's behaviour towards a child or vulnerable adult. It is important that the recipient of any complaint or accusation that a child or vulnerable adult has been or is being abused listens carefully without making or implying any judgment as to the truth of the complaint or accusation.

To ensure that all of the details of an allegation are captured for any future investigation, a detailed record should always be made at the time of the matter being raised.

It is impossible to promise complete confidentiality when a concern is raised, or an accusation made. This is because JS Consult owes a duty of care to anyone employed by them and their associates/contractors in relevant positions, and that cannot be fulfilled unless JS Consult takes action on the basis of information that may have been provided in confidence. The duty of confidentiality must be weighed against the duty of care, in case of potential or actual harm of an individual. However, at all stages, only those people who need to be made aware of an incident or concern, whether internal or external, should be informed.

Where an individual suspects or is informed that a child or vulnerable adult has been, is being or could be harmed as a result of taking place in an activity/event or through contact with anyone employed by JS Consult and their associates/contractors in relevant positions, it is not the responsibility of that person to decide whether abuse has taken place. Instead, the individual aware of these suspicions or allegations must make immediate contact with the Designated Safeguarding Lead for guidance and assistance on the action that must be taken. Staff who are worried about sharing concerns about abuse are encouraged to speak with an appropriate agency for further advice (for example, the NSPCC Child Protection Helpline on 0800 800 5000 or Childline on 0800 1111).

Where a complaint of abuse is reported, the Designated Safeguarding Lead will carefully consider the information available and decide on the appropriate course of action. Such situations may require contact with the relevant external agencies (including social services and the police) for them to investigate the matter and determine any necessary action. This may include invoking JS Consult's employee disciplinary procedures.

In emergency circumstances (for example, where there is certain immediate and significant danger to an individual or a criminal act has been witnessed), staff should make referrals to the police, social services or other appropriate authorities themselves prior to consulting with the group's Designated Safeguarding Lead. In such cases, a criminal investigation may follow.

JS Consult has a duty to refer an individual to the DBS if they have been removed from working in regulated activity with young people and/or adults because they caused harm to young people/adults or posed a risk of causing harm. The duty to refer is absolute and overrides any concerns about data protection.

All cases for possible referral must be raised with the Designated Safeguarding Lead in the first instance as soon as harm or a risk of harm is identified. The Designated Safeguarding Lead should complete the DBS referral form found on the DBS's web pages.

The completed form must then be provided to the Managing Director Stella Oparah for review and a final decision on whether the referral is required.

Appendix B – Code of Practice

When working with young people and/or vulnerable adults, staff, trainers, assessors and associates are expected to take account of the guidance below in the way that they conduct themselves.

- Consider the wellbeing and safety of event participants in advance through proper planning and development of safe methods of working/activities;
- Wherever possible, work in an open environment with young people where they can be seen by others;
- Avoid unnecessary physical contact;
- Avoid taking a child or vulnerable adult alone in a car on journeys, however short;
- Avoid taking a child or vulnerable adult to the toilet, unless another adult is present, or another adult is aware (this may include a parent, group leader or other responsible person);
- In a situation where you are alone with a child or vulnerable adult, make sure that others can clearly observe you;
- Set expectations of the standards of behaviour required from participants in an activity/event and encourage them to accept responsibility for their own performance and behaviour;
- Ask participants in an activity/event to take reasonable steps to ensure their own safety and that of others, and to report any inappropriate behaviour they experience/witness or any concerns that they may have;
- Avoid showing favouritism towards particular participants;
- Report incidents of alleged abuse to the Designated Safeguarding Lead and ensure that any allegations are recorded;
- Report any concerns about poor practice to the Designated Safeguarding Lead;
- Report any accidents to the designated person in the department for recording and investigation where required;
- Avoid personal relationships with a child or vulnerable adult;
- It is not appropriate for staff to have a physically or emotionally intimate relationship with a young person under the age of 18. Particular attention is drawn to the provisions of the Sexual Offences Act 2003 which created a new criminal offence of abuse of “a position of trust”;
- Staff, trainers, assessors and associates should remember that inappropriate behaviour can also occur over the telephone, email, social media or internet;
- Only JS Consult’s official social media should be used for engaging with the wider community. Inappropriate or abusive comments should be removed swiftly, and abusive individuals blocked/reported to the social media concerned. Facebook instant chat and other similar functions should not be used to interact with young people or vulnerable adults. Wherever possible, communication should be only public pages and avoid colloquial language/abbreviations which may be misinterpreted (e.g., LOL);
- Do not make suggestive or inappropriate remarks to or about a child or vulnerable adult, even in fun, as this could be misinterpreted;
- Participate in training available to you to support you in your work with young people and vulnerable adults;
- First aid treatment should be given with more than one adult present unless a delay would be life-threatening;
- Do not take young people or vulnerable adults to your home;

- Maintain confidentiality about sensitive information;
- Where it is necessary for staff, trainers and assessors to take photographs or video images of young people or vulnerable adults, written consent must be obtained (from parents/guardians in the case of young people) before these images are taken in order to comply with the Data Protection Act 1998. Personal details and photos which clearly identify an individual must only be published where they (or their parent/guardian) have given specific agreement.