

## **Prevent Duty and British Values Policy**

### **1. Introduction**

This policy supports our core value “To act with inclusivity, integrity and respect” and our commitment to: “ensuring our safeguarding practices reflect Government guidance and meet our regulatory responsibilities”.

Through the application of this policy, we undertake to protect and keep safe individuals, staff and stakeholders and prevent individuals from being drawn into extremism, radicalisation and terrorism.

Our Safeguarding Policy should also be referred to in conjunction with this policy.

### **2. Legal Framework**

This policy has been developed in accordance with following legislation and statutory guidance:

- Counter - Terrorism and Border Security Act 2019
- Apprenticeships, Skills, Children and Learning Act 2009
- Equality Act 2010
- Counter - Terrorism and Security Act 2015 (Section 26)
- Prevent Duty Guidance: for England and Wales (Revised)

Prevent, which is part of the UK’s Counter Terrorism Strategy known as CONTEST, is designed to stop individuals at risk from becoming involved or supporting terrorism or extremist activity.

Radicalisation is a psychological process where vulnerable and/or susceptible individuals are groomed to engage in criminal terrorist activity.

The UK Government defines extremism as vocal or active opposition to fundamental British values, democracy, the rule of law, individual liberty and mutual respect for and tolerance of those with different faiths and beliefs and for those without faith.

Terrorism is an action or threat designed to influence Government or intimidate the public. Its purpose is to advance a political, religious or ideological cause.

In our business activities, Xact has a “Prevent Duty” defined in Section 26 of the Counter Terrorism and Security Act 2015, which states that organisations must have “due regard to the need to prevent people from being drawn into terrorism.”

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*Safeguarding and promoting the welfare of children, young people and adults is everyone's responsibility. Local authorities have a statutory duty to safeguard children, young people and adults in relation to their social services functions. Section 11 of the Children Act 2004 places duties on a range of organisations and individuals to ensure their functions (including any that are contracted out) to have regard to the need to safeguard and promote the welfare of children.*

HM Government (2012), *Channel guidance*.

### 3. Definitions

**British values:** Democracy; the rule of law; individual liberty and mutual respect for and tolerance of those with different faiths and beliefs and for those without faith

**Channel and PMAP:** Part of the Prevent strategy. The process is a multi-agency approach to identify and support individuals at risk of being drawn into terrorism.

**DSL:** Designated Safeguarding Lead. See Safeguarding Policy for details

**DDSL:** Deputy Designated Safeguarding Lead. See Safeguarding Policy for details

**Extremism:** Vocal or active opposition to fundamental British values

**Individuals:** Those receiving our services e.g. apprenticeship training, end point assessment, courses, assessment, RPL, mentoring, learning support, qualifications, CPD activities etc.

**PMG:** Performance Management Group consisting of Directors and an Independent Governance Advisor

**Prevent Duty:** "Due regard to the need to prevent people from being drawn into terrorism." Section 26 of Counter Terrorism and Security Act 2015

**Radicalisation:** Process by which an individual comes to support terrorism and extremist ideologies associated with terrorist groups

**Services:** e.g. Development, organisational, delivery, RPL, course, submission, assessment, internal verification, qualification, quality assurance, moderation, apprenticeship training programme, end point assessment etc

**Staff:** Employee, agency worker, contractor, sole trader, volunteer e.g. manager, supervisor, administrator, tutor, assessor, mentor, internal quality assurer, end point assessor, work experience etc.

**Stakeholders:** Apprentice, apprentice employer, training provider, customer, supplier, user and those with whom we associate

**Terrorism:** The use or threat of action, both in and outside of the UK, designed to influence any international government organisation or to intimidate the public. It must also be for the purpose of advancing a political, religious, racial or ideological cause.

**Xact:** Xact Consultancy & Training Limited and Xact Training Limited trading as Xact Assessment

### 4. Scope

This policy applies to all staff, including Directors, individuals and stakeholders.

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### 5. Objectives

The objectives of this policy are to:

- a) Safeguard our staff, individuals and stakeholders
- b) Ensure that statutory obligations are met
- c) Ensure that staff members and **stakeholders understand** (individuals **how?**) the National Prevent Agenda principles, guidance and practices and receive regular training
- d) Ensure any events held on premises controlled by Xact comply with statutory guidance
- e) Promote British Values
- f) Identify those involved or at risk of being drawn into and involved in extremism, radicalisation and terrorism
- g) Safeguard those identified as being drawn into, involved or at risk of being involved in extremism, radicalisation and terrorism
- h) Prevent actions of those at risk
- i) Foster partnership arrangement with appropriate agencies

### 6. Prevent agenda

- a) Prevent agenda is one of four elements of the Government's counter-terrorism strategy "CONTEST", which are: Prevent, Pursue, Protect, and Prepare. It aims to *"to reduce the risk to the UK and its interests overseas from terrorism, so that individuals can go about their lives freely and with confidence."*
- b) This strategy responds to ideological challenge of terrorism, aspects of extremism and the threat faced from those who promote these views
- c) It works with a wide range of sectors including education, criminal justice, faith, charities, online and health, where there are risks of radicalisation
- d) Prevent Duty incorporates the responsibility to promote Fundamental British Values through business practices
- e) Prevent Duty covers all forms of radicalisation, including risk from extremist faith groups, far right extremism and some aspects of non-violent extremism.

See: [Government guidance](#) for more information

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### 7. Managing reports of someone at risk

#### 7.1 Behaviours and signs of those at risk

Radicalisation can occur over a long period. In some cases, it is triggered by a specific incident or news item and can happen swiftly. There may be clear warning signs of radicalisation. In other cases, changes are less obvious.

See Appendix 1 for a guide on behaviours and signs to help identify possible radicalisation.

#### 7.2 Risk Assessment

A Prevent Risk Assessment and Action Plan is provided to assist those at risk to be identified and managed. These should include activities and events which may pose a risk of radicalisation.

#### 7.3 Identified individuals

If an individual is identified as being involved or at risk of being involved in extremism, radicalisation and terrorism, they must be referred to a DSL or DDSL who will make appropriate referrals.

#### 7.4 Referrals

- a) Prevent referral is a supportive activity which initially involves identifying an individual at risk of radicalisation
- b) The earlier a referral is made, the earlier intervention can occur, which increases the likelihood of its effectiveness
- c) Any referral must be made to a DSL, or in their absence a DDSL. See Section 8.

### 8. Prevent Actions

It is possible to intervene during the radicalisation process and stop individuals becoming drawn towards terrorism or supporting violent extremist activity. This is achieved by Prevent using the Channel Process, a multi-agency local authority-chaired panel.

Channel partners, which include local authority, healthcare providers, probation, housing and police, can extend to members of the community, if considered appropriate. Partners work collaboratively to establish a bespoke support package for vulnerable individuals. For more [details](#)

The Worcestershire Prevent and Channel Panel can be contacted through the [website](#), where information, support and advice, including details of the referral process are available.

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A range of support options are available and may include mentoring, welfare support and access to key social care services.

Amid concerns that an individual is susceptible to radicalisation or recruitment by terrorists or violent extremists, it is important to note the following:

- a) Safeguarding is the primary purpose of the Prevent strategy and it can be used to support our community
- b) The earlier a referral is made, the earlier intervention can occur, which increases the likelihood of its effectiveness
- c) All have a role to play in Prevent in our work environment by helping staff members and individuals understand this policy
- d) Notify others:
  - i) If you consider an individual is in immediate danger, or you see or hear something that may be terrorist-related, call 999 or confidential Anti-Terrorist Hotline on 0800 789 321
  - ii) Contact MI5 on: 0800 111 4645, if you suspect there is a National Security Threat
  - iii) Contact a DSL or DSL on all occasions,
  - iv) A DSL will take appropriate referral action through relevant local authority Channel.

### **9. Promoting British Values**

Our curriculum and business processes are designed to promote British Values and Equality, Diversity and Inclusion.

Freedom of speech is encouraged but discussions which incite extremism, radicalisation or terrorist activities will be challenged and controlled.

### **10. Our Events**

When we hold an event at premises we control, or contracted for providing our services, we will ensure that any guests and guest speakers comply with the spirit of this policy e.g. not permitting guests or speakers who support terrorist or proscribed terrorist organisations, or who are likely to express extremist views

The security and safety of any events will also be reviewed through risk assessment as outlined in our Health and Safety Policy.

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### 11. Partnership Working

We are committed to working with local Channel partners, including local authority and other agencies.

### 12. Responsibilities

The following members of staff are responsible for safeguarding activities:

- a) **Operations Director** - Governor for Safeguarding for Xact: Ensure that our prevent duty and safeguarding activities are robust and consistently applied and that Xact fulfils its legal and statutory obligations.
- b) **PMG**: Ensure compliance of Xact's prevent, safeguarding and related activities, and to examine and set actions based on board meeting safeguarding and prevent logs.
- c) **Apprenticeship Manager**:
  - i) Designated Safeguarding Lead (DSL): Oversee safeguarding activities within Xact Consultancy & Training Limited and advise PMG on compliance, risks and issues.
  - ii) Ensuring British Values are incorporated into apprenticeship activities
- d) **End Point Assessment Manager**: Designated Safeguarding Lead (DSL): Oversee safeguarding activities within Xact Assessment and advise PMG on compliance, risks and issues.
- e) **Course and Assessment Manager**:
  - i) Deputy Safeguarding Lead (DDSL): Support DSL for Xact Consultancy & Training Limited.
  - ii) Ensuring British Values are incorporated into course and qualification activities
- f) **Business Support Manager**:
  - i) Deputy Safeguarding Lead (DDSL): Support DSL for Xact Assessment
  - ii) Ensuring British Values are incorporated into any marketing activities
- g) **Managers**: Ensure that:
  - i) DSLs and DDSLs are supported and committed to this policy and related activities.
  - ii) an ethos is created which upholds core value to act with integrity, inclusivity and respect
  - iii) business activities promote British Values
  - iv) staff undertake appropriate prevent training
  - v) staff read and understand Part One and Annex A of KCSIE and complete annual return.
- h) **All Staff**:
  - i) read and understand this Policy
  - ii) understand their Prevent related responsibilities
  - iii) understand how to refer someone who is deemed at risk within this policy

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### 12.1 Designated Safeguarding Lead

- a) Provide and review risk assessments, action plans
- b) Oversee Prevent referrals through the Channel process with relevant Local Authority
- c) Act as a point of contact with relevant agencies
- d) Liaise with managers coordinating Xact events to ensure compliance
- e) Organise appropriate training to staff members
- f) Advise PMG on compliance, risks and issues

### 12.2 Deputy Designated Safeguarding Lead

Support Designated Safeguarding Lead

## 13. Training

Prevent training will form part of mandatory induction training for all staff. Regular refresher training will also be provided, appropriate to role.

## 14. Record Keeping

An At Risk Register will be maintained on a secure<sup>1</sup> area of our server and contains a record of:

- a) Reports of extremism, radicalisation or terrorism
- b) Investigation of extremism, radicalisation or terrorism
- c) Outcomes of extremism, radicalisation or terrorism investigations

**Note**<sup>1</sup>: Access to the At Risk Register will be in accordance with our Data Management Policy, and maintained in accordance with our Record Retention Policy.

## 15. Monitoring

PMG will review the records quarterly

## 16. Confidential and Information Sharing

We have a duty to share information with appropriate agencies in matters relating to our Prevent Duty, at the earliest opportunity, as per statutory guidance.

## 17. Associated Policies

This policy should be read in conjunction with the following policies:

- a) Safeguarding Policy
- b) Bullying and Harassment Policy
- c) Complaints Policy
- d) Data Management Policy

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- e) Record Retention Policy
- f) Equality, Diversity and Inclusion Policy
- g) Health and Safety Policy
- h) Behaviour and Appearance Policies
- i) Staff Recruitment Policy
- j) Attendance Policy



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**Appendix 1: Behaviours and signs of those at risk**

Radicalisation can occur over a long period. In some cases, it is triggered by a specific incident or news item and can happen swiftly. There may be clear warning signs of radicalisation. In other cases, changes are less obvious.

The following behaviours and signs are intended as a guide to help identify possible radicalisation:

- a) Becoming increasingly argumentative
- b) Refusing to listen to different points of view
- c) Unwilling to engage with others who are different
- d) Becoming abusive to others who are different
- e) Embracing conspiracy theories
- f) Feeling persecuted
- g) Changing friends and appearance
- h) Distancing themselves from old friends
- i) No longer doing things they used to enjoy
- j) Converting to a new religion
- k) Being secretive and reluctant to discuss their whereabouts
- l) Sympathetic to extremist ideologies and groups
- m) Changing online identity
- n) Having more than one online identity
- o) Spending a lot of time online or on the phone
- p) Accessing extremist online content
- q) Joining or trying to join an extremist organisation