



Prevent Duty Policy and Procedure: Apprenticeships

General Policy Statement

Exelin recognises that as a provider of apprenticeship training it has a responsibility to ensure it fulfils responsibilities regarding its Prevent duty and anti-radicalisation procedures.

The aim of the policy is to ensure that our apprentice trainers and other staff are aware of and understand their responsibilities, that of others, and for signs that there might be a Prevent duty concern, along with the reporting procedures for all Prevent duty issues.

This policy has five key objectives:

- To promote and reinforce shared values
- To help empower apprentices and other learners engaged to play a wider role in their communities
- To ensure apprentice and other learners' safety and raise awareness of the damage caused by bullying, harassment and discrimination
- To provide appropriate sources of advice and guidance
- To ensure that learners and employees are aware of their roles and responsibilities in preventing violent extremism.

In the course of undertaking the 20% off the job training, apprentice trainers and/or other staff may learn of issues appertaining to Prevent duty and where this arises a procedure is in place to ensure they fulfil their duty of care.

Exelin recognises that an apprentice has employed status and as such the policy also references the employers' responsibilities for the Prevent duty.

This policy is based on the following principles:

- Effective and accurate identification, assessment and management of risk
- Safe recruitment, selection and development of staff and apprentices
- The welfare of apprentices is paramount and individuals are treated with respect and dignity
- Roles and responsibilities for Prevent duty are clearly identified
- Guidance, training and support is provided for staff and apprentices
- Where it is safe to do so the apprentice is made aware when disclosures are to be reported to the Apprenticeships Programme Lead who also holds responsibility, as our Designated Safeguarding Officer for the Prevent duty
- Information about concerns is shared with appropriate individuals and agencies who need to know.

Definition

Prevent is the duty in the Counter-Terrorism and Security Act 2015 on specified authorities, to have due regard to the need to prevent people from being drawn into terrorism through radicalisation and includes consideration of online safety and British values.

Prevent is one of the four elements of CONTEST, the Home Offices' counter-terrorism strategy. The strategy covers all forms of terrorism. Its aim is to respond to the ideological challenges our country faces from terrorism and aspects of extremism and provides practical help to prevent people from being radicalised by providing advice and support. Exelin is committed to support vulnerable apprentices through both its Prevent Duty Policy and Safeguarding Policy.

The Legal Context

Exelin will act in accordance with relevant legislation and statutory guidance.

Promotion of the Policy and Procedure

Exelin will promote and publicise the Prevent Duty Policy as widely as possible using our Internal SharePoint site (for apprenticeship training staff), website, apprentice induction guide, learner handbooks and reports.

Eligibility

This policy applies to all apprentices and Exelin staff associated with apprentice training operations and delivery.

Policy

1. We all have a responsibility to ensure that apprentices at risk are protected from harm, informed about potential risks to their welfare, understand how to seek help and to ensure any concerns are dealt with in a timely and appropriate fashion, in line with best Prevent and safeguarding practises such as the concept of "early help", providing support as soon as a problem emerges.
2. We also have a responsibility to minimise the risk of allegations against apprentice trainers and other staff.
3. All staff and apprentice trainers are expected to have a good understanding of what constitutes a Prevent duty or welfare concern and how to provide support or guidance and the channels for escalating a concern. It will also ensure that they can identify the Designated Safeguarding Officer (DSO) for Exelin, who also holds responsibility for our adherence with the Prevent duty.
4. We will ensure that the contractual arrangements with associate apprentice trainers clearly sets out their Prevent duty obligations.

5. We will ensure that the contractual arrangements with the apprentices' employer identifies who to contact so that we can understand how the employer meets their Prevent duty obligations for their apprentices.
6. We will provide initial and on-going training and information to proactively promote Prevent duty awareness and support all staff and apprentice trainers to understand their individual responsibilities. Where no formal training is held by our apprentice trainers, we will support them through distance learning prior to deployment. All associate apprentice trainers contracted by Exelin will be given access to a secure site where this and other important policies are located. They will be required to submit evidence of their annual CPD in the area of their Prevent duty.
7. We will provide information on Prevent duty, safeguarding, welfare and well-being during the apprentices' on-boarding and induction. It will also be included as a standing item as part of the review process to ensure ongoing awareness.
8. The Designated Safeguarding Officer (DSO) for Exelin, who also holds responsibility for our adherence with the Prevent duty is assigned to the role of the Apprenticeships Programme Lead. In their absence, a suitable proxy will be assigned. Should an apprentice trainer or employee of Exelin have a concern regarding the Prevent duty related to an apprentice they should report their concerns to the DSO. The DSO of Exelin has an obligation to report any concerns to the individual at the apprentices' employer who has responsibility for the Prevent duty.
9. The same is true if any employee or apprentice trainer has a concern regarding a colleague or other professional.
10. Enquiries and Investigations; where outside agencies are involved in any Prevent duty incident or reported issue, we will, when required to do so, liaise and provide information to relevant authorities, whilst ensuring that the apprentice is kept informed, where it is safe for them to be so.
11. Data collection, storage and sharing of records of Prevent duty incidents will be retained in a safe place, together with a written record of outcomes. All data shared between the apprentices' employer, our associate apprentice trainers and Exelin will be treated as confidential, unless there is a requirement to share with the appropriate local authorities, such as in a Prevent duty concern. No data shall be used in ways that might discriminate against any apprentice, apprentice trainer or Exelin employee.
12. The policy and any incidents arising from the Prevent duty will be monitored on an ongoing basis by the Apprenticeships Programme Lead and overseen by the Executive Director of Exelin.
13. We will review our Prevent duty and policies and supporting processes annually. This will include an annual assessment of the potential risks and the context and level of Prevent duty risk posed by our work as a provider of apprenticeship training. This will feed into our risk

assessment process and risk register so that we understand and can mitigate Prevent duty risks as they appertain to our apprentices.

Prevent Duty Process

This Prevent duty process has three aspects;

- **Identify** where risks around radicalisation are most likely to occur relevant to the industry and types of apprentice in any cohort
- **Help** by putting in place processes or strategies to appropriately support apprentices and providing them with good quality information (e.g. staying safe on line) to increase their resilience and well being.
- **Manage** Prevent duty risks in a way that is appropriate to our business and which act to minimise Prevent duty incidents or issues.

Strategy

In order to achieve these objectives, the strategy will concentrate on four areas;

1. Leadership and Values

To provide an ethos which upholds core values of shared responsibility and wellbeing for all apprentices and other learners, employees and visitors and promotes 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 employees and apprentices and other learners understanding of the issues and confidence to deal with them deepening engagement with local communities
- Actively working with local schools, local authorities, police and other agencies

2. Teaching and Learning

To provide a curriculum which promotes 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 equality, diversity and inclusion, into all learning interventions.
- Promoting wider skill development such as social and emotional aspects of learning
- Encouraging active citizenship/participation and learner voice.

3. Learner Support

To ensure that employees are confident to take a proactive approach to the promotion of British values. This will be achieved through:

- Establishing strong and effective apprentices and learner support
- Understanding better our local communities and the needs of learners, their families and communities
- Implementing anti-bullying strategies and challenging discriminatory behaviour Supporting at risk students through safeguarding procedures
- Continuing focus on narrowing the attainment gap for all apprentices and other learners
- Challenging unacceptable behaviour

4. Managing risks and responding to events

To monitor risks and be ready to deal appropriately with issues which arise. This will be achieved through;

- Understanding the nature of the threat from violent extremism and how this may impact directly or indirectly on our organisation and its activities
- Responding appropriately to events in local, national or international news that may impact on students and communities
- Ensuring plans are in place to respond appropriately to a threat or incident Further developing effective ICT security and responsible user policies.

Referral Process

The process used to handle anti-terrorism (Prevent) and anti-radicalisation is called a channel referral process. Channel is the name for the process of identifying and referring a person at risk of radicalisation for early intervention and support.

It is a multi-agency approach to protect vulnerable people. It uses collaboration between local authorities, statutory partners (such as education and health organisations, social services, children's and youth services and offender management services), the police and the local community.

Exelin Ltd. will make information on the local reporting arrangements for the channel referral process available to employees, associates, apprentices and other learners at induction and on a secure part of our website. More comprehensive information can be provided upon request from the Apprenticeships Programme Lead who is our Prevent duty lead.

Some Prevent or anti-radicalisation concerns may have a security dimension to them. For this reason, it is important that liaison with the police forms an early part of all investigations. The emphasis is on early intervention to protect and divert people away from the risk they face before being drawn into committing terrorist-related activity.

Police will carry out an initial assessment and, if appropriate, set up a multi-agency meeting to agree actions for supporting the individual. If it is deemed that there are no concerns around radicalisation, appropriate and targeted support will be considered. Where a young person is thought to be at risk of significant harm, and/or where investigations need to be carried out, it is recognised that concerns of this nature, in relation to violent extremism, are most likely to require a police investigation (as part of the channel process).

Procedure showing how we will fulfil the Prevent duty

1. If an employee or associate identifies people at risk of being drawn into terrorism or extremism, they should assess the nature and extent of that risk and consider if it poses an immediate danger.
2. Report to the Prevent duty lead (Designated Safeguarding Officer), initially this can be a verbal report but it should be followed up with a written report using the same report form that we use for Safeguarding.
3. Designated Safeguarding Officer undertakes an initial investigation and considers whether the Prevent Duty concern is also a Safeguarding concern.
4. Designated Safeguarding Officer to liaise with the apprentices' employer where it is safe and appropriate to do so.
5. Where relevant, develop the most appropriate support plan for the apprentice or employee.
6. Or where deemed a Prevent Duty risk the Designated Safeguarding Officer will invoke the Channel Referral Process. As part of the referral process, the Designated Safeguarding Officer will raise an electronic referral, which goes to the Police.
7. Employees, associates and the Designated Safeguarding Officer will cooperate with the authorities who may take the process forward from this point.

Note:

Channel operates in the 'pre-criminal' space. It is not suitable for an individual who you believe has – or is about to – commit a criminal offence, this should be reported to the police.

Apprentice reporting radicalisation or extremism concerns about another apprentice

Should an apprentice report a concern regarding another apprentice Exelin Ltd. will always take the issue seriously. The person receiving the information should still follow the above process.

Allegations against employees or associates

Exelin Ltd recognises its duty to report concerns or allegations against its employees or associates (paid or unpaid) within the organisation or by a professional from another organisation.

Prevent Duty Monitoring and Effectiveness

By considering the implications of effective Prevent or anti-radicalisation procedures in our business and training activities, we aspire to embed British Values in all that we do as a provider of apprentice training.

To monitor and ensure the effectiveness of our Prevent Duty Policy and Procedure we undertake:

1. Annual review of this policy
2. Annual review/update of the Prevent Duty Risk Assessment with consideration of its links to this Safeguarding policy
3. Annual communication of this policy to promote the importance of Prevent and Anti Radicalisation and ensuring all trainers, employees and associates understand their responsibilities
4. Checking that related policies are up to date and relevant at least annually
5. Preparation of quarterly reports on Prevent or anti-radicalisation incidents and reported concerns for the senior management team to look at patterns or trends in order that we can learn from each incident or concern and mitigate the risk of similar issues being repeated.

Confidentiality

Information will be gathered, recorded and stored in accordance with the Data Protection Policy.

All employees and associates must be aware that they have a professional duty to share information with other agencies in order to protect apprentices and other learners.

Safeguarding apprentices and other learners may override confidentiality interests. However, information will be shared on a need to know basis only, as judged by the Prevent champion, who is also our Designated Safeguarding Officer.

Responsibility for this policy

Liz Allan, Apprenticeships Programme Lead for Exelin Ltd is responsible for this policy.

Policy review

Exelin will review the Safeguarding Policy and Procedure on an annual basis or in the event of the publication of new guidelines/official communications or following lessons learnt upon the conclusion of a Safeguarding incident, whichever is the sooner.

Review Date: March 2020

Links to other policies

This policy should be read in conjunction with the:

- Exelin Safeguarding Policy and Procedure: Apprenticeships
- Exelin Equality and Diversity Policy; Apprenticeships
- Exelin Apprentice Welfare Statement
- Exelin Bullying and Harassment Policy
- Exelin Apprentice Positive Behaviour Strategy and Procedure
- Exelin Apprentice Positive Behaviour Strategy and Disciplinary Procedure
- Exelin Apprentice Attendance Management Procedure
- Exelin Employee Recruitment and Selection Process
- Exelin Apprentice Fair Access and Reasonable Adjustments Policy
- Exelin Complaints Policy, Procedure and Process: Apprenticeships
- Whistleblowing policy
- Exelin Employee Grievance and Disciplinary Procedures
- Exelin Health and Safety policy
- Exelin Data Protection Policy (confidentiality).